

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Jones Canyon – Santiam No. 1 Access Road Improvement Project; Phase 2 Line Miles 109 and 115 - 132

**PP&A No.:** 6931

**Project Manager:** Donna Martin, TELF-TPP-3

**Location:** Marion County, Oregon

**Categorical Exclusion Applied (from 10 C.F.R. Part 1021):** B1.3 Routine Maintenance

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to improve access roads along the Jones Canyon-Santiam No. 1 transmission line in Marion County, Oregon. BPA owns and operates the Jones Canyon-Santiam No. 1 high voltage transmission line which runs from Jones Canyon Substation in Gilliam County, Oregon, across the Oregon Cascades to Santiam Substation in Marion County, Oregon. The transmission line is a key component of the Northwest's high voltage electrical transmission system. It is supported by steel lattice structures. BPA transmission line maintenance crews access the transmission line right-of-way for periodic inspections, repairs, and emergency response through a series of compacted gravel access roads. The BPA access road system along the Jones Canyon – Santiam No. 1 line is in disrepair and in need of maintenance.

For Phase 2 of the access road work, BPA proposes to improve access roads in line miles 109 and between 115 and 132. The project area runs through the Mt. Hood and Willamette National Forests. The majority of the proposed work would be within existing access road footprints. Specifically, BPA proposes to improve approximately 9 miles of access roads, reconstruct approximately 2 miles, and install approximately 200 feet of new access road or trail. Road improvements consist of light blading of the road base, placement of rock, and compaction. Road reconstruction includes heavier blading, placement of base and surface rock, and compaction. A new road or a smaller width trail would be constructed that would include blading to establish the road prism or trail bed, placement of base and surface rock, and compaction. In addition to the road work, BPA proposes to improve approximately 30 landings at existing transmission steel lattice structures. Landings are comprised of compacted rock, and range in size up to 50 feet by 50 feet to allow for safe access to the transmission line for maintenance equipment. Surface water control features would also be installed to properly channel run-off and stormwater off the road surface into established natural drainages. BPA would install approximately 350 water bars and 100 drain dips to facilitate stormwater drainage. BPA also plans to install one 36-inch-diameter culvert in an unnamed, non-fish bearing ephemeral waterway in line mile 122, and two 24-inch-diameter culverts in line miles 128 and 130 of the project in un-named, non-fish bearing ephemeral waterways. A ford crossing of Deadhorse Creek, a non-fish bearing tributary to the Breitenbush River in line mile 120 of the project, would also be widened and reconstructed.

In addition to this proposed work, in line mile 109 of the project, the headwaters of Cub Creek run through the transmission ROW, and the BPA access road (U.S. Forest Service Road 4220022)

has eroded and intercepted the Cub Creek drainage as well as an unnamed tributary to Cub Creek. Cub Creek is an intermittent stream at this elevation and is typically dry in late summer and early fall. BPA proposes to reconstruct the access road along the historic USFS 4220022 road alignment and install stream crossing features to redirect the Cub Creek drainage and tributaries into historic drainage channels and wetlands. Approximately 3,200 linear feet (0.6 mile) of access road would be reconstructed in this area, as well as a ford crossing, 9 drain dips to channel water off the reconstructed road, and the installation of ditch relief and spot rock in strategic locations to assist with redirecting surface water. Gates would also be installed at the main access points to discourage access into the area.

Standard road construction equipment would be utilized for the project, such as dump trucks, graders, roller compactors, excavators, and light duty trucks. Work would be completed in the summer and fall of 2026. All disturbed, unrocked soils would be stabilized with native, climate appropriate seed and temporary stabilization best-management practices such as weed free straw and erosion control blankets and monitored periodically to ensure revegetation goals are met.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

**Findings:** In accordance with Section 1021.102 of the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, Jul. 9, 1996; 61 FR 64608, Dec. 6, 1996; 76 FR 63764, Nov. 14, 2011; 89 FR 34074, April 30, 2024; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and *DOE National Environmental Policy Act (NEPA), Implementing Procedures* (dated June 30, 2025), BPA has determined the following:

- 1) proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
- 2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
- 3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

*/s/ Aaron Siemers*

Aaron Siemers

Physical Scientist (Environmental)

Concur:

*/s/ Katey Grange*

Katey C. Grange

NEPA Compliance Officer

Date: February 26, 2026

Attachment(s): Environmental Evaluation

# **Categorical Exclusion Environmental Evaluation**

This evaluation documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

**Proposed Action:** Jones Canyon – Santiam No. 1 Access Road Improvement Project; Phase 2 Line Miles 109 and 115 - 132

## **Project Site Description**

The Jones Canyon – Santiam No. 1 Access Road Improvement Project spans over 20 linear miles in central Oregon, in the Cascade Crest Montane Forest and Western Cascades Montane Highlands ecoregions in the Cascade Mountain Range of the Pacific Northwest. The project area is characterized by rugged mountainous terrain, and forested with Douglas fir, grand fir, lodgepole pine, and other common coniferous species of the Northwest. Understory in this area includes ferns, vine maple, rhododendron, thimbleberry, Oregon grape, and native and introduced grasses. In 2020, the Lionshead Fire burned through a significant portion of the project area. The area was severely burned, with extensive tree mortality.

The Jones Canyon – Santiam No. 1 transmission line is the primary constructed feature of the project area, as well as the existing access road system and stream crossing features. The steel lattice line runs through a cleared transmission corridor of approximately 350 feet in width. The corridor is shared by BPA lines and a non-BPA transmission line. Vegetation within the corridor is periodically managed to promote low-growing species. Large mature trees are only found within spanned canyons of the corridor. Vegetation within the corridor is comprised of common native grasses and shrubs. The BPA access road system runs through and adjacent to the corridor. Access roads are generally 12 to 14 feet in width and are compacted gravel or dirt two-track roads. Ditching, gates, and water crossing features such as fords and culverts are present. BPA access roads branch off from the main roads managed by the U.S. Forest Service (USFS), including Breitenbush Road and other National Forest roads.

Land use includes federal lands managed by the US Army Corps of Engineers and USFS, Mt. Hood National Forest and Willamette National Forest. Waterways in the project area include the headwaters of Cub Creek, a tributary to the Clackamas River, and Deadhorse Creek as well as several other unnamed streams which are tributaries to the Breitenbush River and Detroit Lake. The project area also contains designated critical habitat for northern spotted owl.

## **Evaluation of Potential Impacts to Environmental Resources**

### **1. Historic and Cultural Resources**

Potential for Significance: No with Conditions

Explanation: Under Section 106 of the National Historic Preservation Act, on January 11<sup>th</sup>, 2022, BPA initiated consultation with the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Warm Springs Reservation of Oregon, The Confederated Tribes of Grand Ronde, the USFS – Mt. Hood and Willamette National Forests (USFS), the United States Army Corps of Engineers – Portland District (USACE), the Oregon State Department of Forestry, and the Oregon State Historic Preservation Office (OR SHPO). An Area of Potential Effects (APE) was defined and three previously recorded sites were relocated during an archaeological field survey, and one new isolated find and two historic built environment resources (Jones Canyon-Santiam No. 1 and McNary-Santiam No. 1

transmission lines) were recorded in the APE. The site effects would be minimized through the use of monitors and geotextile fabric as described in the notes below.

On October 20, 2023, BPA determined that the implementation of the proposed undertaking would result in no adverse effect to historic properties and received concurrence from the OR SHPO on November 21<sup>st</sup>, 2023.

On January 21, 2026, BPA reinitiated consultation with an updated APE map to include changes to the design in line mile 109. BPA made a determination that the updated proposed action would have no adverse effect to historic properties. BPA received concurrence from the OR SHPO on February 17<sup>th</sup>, 2026. None of the other consulted parties responded during the comment period.

Notes:

- In those locations where road work is planned near recorded cultural resources, BPA would employ cultural monitoring to mitigate potential impacts to cultural resources, as well as use geotextile fabric during road improvements to protect the underlying soils and substrate.
- In the event of an inadvertent discovery of historic or cultural resources, BPA would implement an inadvertent discovery plan, stop work, and contact consulted parties.

## 2. Geology and Soils

Potential for Significance: No

Explanation: The majority of the work would occur in the existing dirt and gravel access road prism, where a road-base of rock already exists. Only 200 linear feet of new road or trail construction is proposed. Standard construction erosion control measures would be utilized as necessary to prevent erosion, and disturbed areas would be stabilized with mulch and a native seed.

With current conditions, due to degraded road surfaces and stormwater control features, seasonal run-off and stormwater are being captured by the access road system, which is resulting in erosion and sedimentation. The proposed access road maintenance would remedy the current erosional conditions in the project area.

Notes:

- BPA and BPA's contractor would develop and implement an erosion and sediment control plan during construction, to minimize the risk of erosion and sedimentation. Disturbed soils would be seeded and stabilized with mulch or hydroseed upon project completion.

## 3. Plants (including Federal/state special-status species and habitats)

Potential for Significance: No with Conditions

Explanation: The majority of the project would occur on existing BPA access road footprint. However, some new landings would be installed, and temporary impacts to plants would occur due to construction activity, during access road blading and especially at locations such as turn-arounds and staging areas.

In accordance with the Endangered Species Act, BPA reviewed the project and potential effects to ESA-listed species in the project area. BPA obtained an official species list for the project area from U.S. Fish and Wildlife Service on December 23, 2025. No ESA-protected plant species are listed in the project area.

From reviewing available natural heritage data and in correspondence with USFS, no known special status plants are present in the project area.

Notes:

- Any disturbed areas would be reseeded with a native climate appropriate seed mix

- All construction equipment and vehicles would be cleaned prior to entering the project site in order to prevent the spread of invasive weeds.

#### **4. Wildlife (including Federal/state special-status species and habitats)**

Potential for Significance: No with Conditions

Explanation: Wildlife in the area may be disturbed by construction activities; however, the disturbance would be temporary, and the surrounding landscape provides ample habitat and cover.

In accordance with the ESA, BPA reviewed the project and potential effects to ESA-listed species in the project area. BPA obtained an official species list for the project area from U.S. Fish and Wildlife Service on December 23, 2025. The project area is within northern spotted owl designated critical habitat and near historical northern spotted owl nest locations.

The northern spotted owl nesting period is generally March 1st – September 30th, but the late nesting period is defined as July 16th – September 30th, when juvenile northern spotted owl have greater mobility and are able to avoid disturbances and disruptions.

BPA has consulted with USFS biologists regarding effects to northern spotted owl. BPA was provided suitable nesting habitat GIS data by Willamette National Forest to minimize potential impacts to nesting northern spotted owls during the critical nesting period. Planned construction activities and effects to listed species fall under the USFS' programmatic Biological Assessment for Routine Land Management Activity. BPA has determined that the project "May effect but is not likely to adversely" northern spotted owl.

BPA has determined that the project would have "No effect" on other ESA-listed terrestrial species in the project area. For more information, consult the project's ESA Effects Determination Memo.

No additional special-status, State-listed, or USFS-protected species are present in the project area or would be significantly impacted by proposed road maintenance activities.

Notes:

- In those locations within 65 yards of suitable northern spotted owl nesting habitat, BPA would complete work on the project during the late nesting period between July 15<sup>th</sup> and February 28<sup>th</sup>. Those road maintenance locations subject to the northern spotted owl timing restrictions include: 115 through 117 mile, 123 through 124 mile, 126 through 127 mile, and 130 mile.

#### **5. Water Bodies, Floodplains, and Fish (including Federal/state special-status species, ESUs, and habitats)**

Potential for Significance: No with Conditions

Explanation: Numerous ephemerals to intermittent drainages are present in the project area, as the area drains toward the Breitenbush River and Detroit Lake. However, no work in fish-bearing waterways is proposed.

In regard to in-water work, BPA is proposing to improve the existing ford crossing at Deadhorse Creek, a perennial tributary to the Breitenbush River, and install three new culverts in unnamed, ephemeral tributaries to the Breitenbush River and Detroit Lake. These waterways where culvert installations are proposed are seasonal and no in-water work is anticipated, as the work would be conducted in the dry season, during the in-water work windows for the watershed.

In line mile 109 in the Cub Creek drainage area, the BPA access road has eroded and captured the Cub Creek channel. Cub Creek is not fish-bearing at this location. BPA is proposing to reconstruct the historic road footprint and re-direct the Cub Creek drainage into adjacent wetlands and historic drainage areas.

BPA assessed the proposed impacts to waterways associated with the Deadhorse Creek ford improvements, culvert installation, and Cub Creek road reconstruction, for compliance with the Oregon Removal-Fill Law (OR RF Law) and the Clean Water Act (CWA). The proposed culvert installation locations are located in ephemeral, seasonal waterways and therefore the proposed work is not regulated by the CWA or OR RF Law. However, the Deadhorse Creek ford improvement and the Cub Creek road reconstruction are actions regulated under these laws. BPA has conducted a wetland and waterway delineation of these work locations and developed a Joint Permit Application to permit the work under the OR Removal Fill Law and Section 401 and 404 of the Clean Water Act. The Joint Permit Application would be submitted in winter of 2026. No regulated work would proceed until BPA has obtained the required permits to construct in these waterways.

While no work in fish-bearing waterways is proposed, due to the presence of ESA-listed chinook salmon and steelhead in the Breitenbush River, BPA consulted with the National Marine Fisheries Service (NMFS) on the proposed action. BPA and NMFS have a standing programmatic biological opinion for impacts to ESA-listed species under NMFS' jurisdiction for routine access road maintenance activities (WCR-2014-1600). Under the terms of the biological opinion, on January 2, 2026, BPA submitted a notification of planned action to NMFS and would implement the project design criteria described in the consultation to minimize potential impacts to endangered salmonids.

Notes:

- Culvert installation and ford improvements would be planned during the dry season, in the approve in-water work window for the Breitenbush River and Detroit Lake; June 1<sup>st</sup> – August 31<sup>st</sup>.
- If seasonal flow is present during culvert installation and ford improvements, in-water work isolation measures would be completed prior to ground disturbance in the channel.
- Proposed road reconstruction in line mile 109 in the Cub Creek drainage area would proceed late in the summer and early fall when no water is present in the channel and adjacent wetlands.
- All CWA and OR RF permit minimization measures and terms and conditions would be followed during construction.

## 6. Wetlands

Potential for Significance: No with Conditions

Explanation: In general, the project area is located in areas of relatively substantial grade and elevation where wetlands are uncommon. Additionally, the proposed road maintenance project would occur primarily on existing road footprint. However, in line mile 109, in the Cub Creek headwaters and drainage area, a large wetland complex is present in the transmission right-of-way, adjacent to the current Cub Creek channel and small unnamed tributaries. BPA conducted a wetland and waterway delineation to map the wetland boundaries in this location. Wetland vegetation includes spirea, ninebark and green alder with Oregon checker-mallow and common sedges.

As mentioned previously, the Cub Creek drainage appears to have been captured by the eroded BPA access road (USFS 4220022) in this location. In order to reconstruct the historic BPA access road, improvements would impact the wetlands adjacent to the current Cub Creek channel.

BPA assessed the proposed impacts to wetlands for compliance with the Oregon Removal-Fill Law (OR RF Law) and the Clean Water Act (CWA). The Cub Creek road reconstruction would be regulated under these laws. BPA has conducted a wetland and waterway delineation of these work locations and developed a Joint Permit Application to permit the work under the OR Removal Fill Law and Section 401 and 404 of the Clean Water Act. BPA is proposing a total of 0.25 acres of wetland impacts to re-construct the historic road. The Joint Permit Application would be submitted in winter of 2026. No regulated work would proceed until BPA has obtained the required permits to construct in these wetlands.

Notes:

- Proceed with proposed road reconstruction in the Cub Creek wetlands upon obtaining permits under the CWA Section 401 and 404 and the OR RF Law.
- All CWA and OR RF permit minimization measures and terms and conditions would be followed during construction.
- Perform road reconstruction actions late in the dry season, late summer and early fall, when the Cub Creek wetlands and waterways have been observed to be dry

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: The excavation planned for the project area would not be at a depth that would potentially disrupt groundwater or impact local aquifers.

## **8. Land Use and Specially-Designated Areas**

Potential for Significance: No

Explanation: The project is located within an existing high-voltage transmission line corridor and access road system. Adjacent land use includes federally managed forests lands for timber harvest, wildlife habitat, and recreation. There are no specially-designated areas present. Road users would have minimal disruption and alternate routes exist. Existing land use would not be impacted by project activities.

## **9. Visual Quality**

Potential for Significance: No

Explanation: The project would have temporary impacts to visual quality associated with soil disturbance and construction activity. Visual impacts associated with ground disturbance would be localized and temporary until revegetation occurs.

## **10. Air Quality**

Potential for Significance: No

Explanation: Some dust may be generated due to construction activity. However, dust generation should be minimal due to the scope of the ground disturbance. The area is remote with limited human receptors.

## **11. Noise**

Potential for Significance: No

Explanation: Some temporary noise may be generated due to construction activity. However, the project is located in a remote area and construction noise would not be significant.

## **12. Human Health and Safety**

Potential for Significance: No

Explanation: A site-specific safety plan would be developed by the access road construction contractor and implemented during construction. Overall, the project would improve the safety and reliability of the transmission system, and provide safer access to transmission structures during inspection, maintenance, and emergency response.

### **Evaluation of Other Integral Elements**

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

**Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.**

Explanation: N/A

**Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.**

Explanation: N/A

**Disturb hazardous substances, pollutants, contaminants, or CERCLA excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases.**

Explanation: N/A

**Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.**

Explanation: N/A

### **Landowner Notification, Involvement, or Coordination**

Description: BPA has coordinated proposed activities with the USFS Willamette National Forest and Mt. Hood National Forest and would receive authorization to proceed from the respective National Forests prior to construction start. BPA would continue to coordinate activities with all land managers into the construction phase of the project.

Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ Aaron Siemers    Date: February 26, 2026  
Aaron Siemers  
Physical Scientist (Environmental)