

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: FY26 Eugene Bundle Vegetation Management Maintenance

PP&A No.: 6754

Project Manager: Carlos Mora Flores – TFBV-ALVEY

Location: Benton, Coos, Douglas, Lane, Lincoln and Linn Counties, Oregon

Categorical Exclusion Applied (from 10 C.F.R. Part 1021; USFS NEPA procedures 36 CFR 220.6[e] as adopted July 23, 2024): B1.3 Routine Maintenance; 2.(e)(12) Harvest of live trees not to exceed 70 acres; 3.(e)(13) Salvage of dead and/or dying trees not to exceed 250 acres

Description of the Proposed Action: BPA proposes to maintain low growing vegetation communities in specific, localized areas in and adjacent to the corridors of Cougar-Holden Creek No 1, Santiam-Alvey 1&2 No 2, Santiam-Toledo No 1, Toledo-Wendson No 1, Green Peter-Lebanon No 1 and Reston-Fairview No 2. rights-of-way (ROW) in Coos, Douglas, Lane, Lincoln and Linn Counties, OR. Specifically, Transmission Lines and spans denoted in the table below. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the right-of-way corridors and associated access roads along these transmission facilities.

Transmission Line	Spans
Cougar-Holden Creek No 1	0/1 to 27/10
Holden Creek-Thurston No 1	1/1 to 12/5
Thurston-McKenzie No 1	1/11 to 8/5
Blue River Tap to Cougar-Holden Creek	1/2 to 1/5
Santiam-Alvey 1&2 No 2	13/1 to 61/4
Santiam-Toledo No 1	29/1 to 66/2
Albany-Burnt Woods No 1	0/1 to 17/5
Reston-Fairview No 2	1/2 to 30/5
Alvey Fairview No 1	79/1 to 79/6; 84/4 to 85/8; 95/5 to 95/8
Toledo-Wendson No 1	0/1 to 51/4
Green Peter-Lebanon No 1	1/1 to 19/3
Foster Tap to Green Peter-Lebanon No 1	1/2 to 4/6

To comply with Western Electricity Coordinating Council standards, BPA proposes to use hand cutting, mowing, herbicidal treatment, or a combination of those methods to manage and maintain vegetation with the goal of removing tall-growing vegetation that is currently or will soon become a hazard to the transmission line (a hazard is defined as one or more branches, tops, and/or whole trees that could fall or grow into the minimum safety zone of the transmission line(s) causing an

electrical arc, relay, and/or outage). The overall goal of BPA is to establish and maintain low-growing plant communities along the right-of-way to control the development of potentially threatening vegetation. Work would be done consistent with BPA's long-established vegetation management program and all herbicide(s) and adjuvant(s) mixture selections would follow the minimization measures identified in the BPA List of Approved Herbicide Environmental Standards & Procedures (ESP)# E-VGM-004.

The corridors in the proposed project area measure between approximately 100 and 300 feet in width and approximately 257 miles in length. The proposed activities include treatment of up to 2,325 acres using localized hand cutting methods followed immediately by an herbicide spot treatment of hardwood stems as well as the treatment of up to about 3,400 acres localized herbicide applications. The proposed activities would also include about 1,240 acres mowed, 113 miles of access roads, and 30 structure sites of existing transmission line and access road rights-of-way would be initially treated in the fall of 2025 through spring of 2026. Additional vegetation management may be necessary in subsequent years in discrete areas of noxious weeds or where BPA personnel discover vegetation that poses a hazard to the transmission line.

Herbicides would be selectively applied in accordance with their label instructions and BPA-listed buffer distances using spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar) or localized treatments and cut stubble treatments) with chemicals approved by BPA to ensure that the roots are effectively controlled - preventing new sprouts - and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure. For worker safety and fire prevention, broad-spectrum (non-selective) residual herbicide would be applied in a localized area beneath and immediately adjacent to switch platforms and selected transmission structures (primarily wood poles). A follow-up treatment of re-sprouting target vegetation would be conducted by. Additional vegetation management may be necessary in subsequent years of the vegetation management cycle in discrete areas of noxious weeds, or where BPA personnel discover vegetation that poses a hazard to the transmission line.

In addition, BPA proposes to remove about 700 danger trees (DT) and 1,100 corridor trees (CT) would be removed in, or adjacent to, the ROW and to remove side limbs or tops from approximately 2,000 trees in, or adjacent to, the ROW. Tree clearing would not be concentrated and occur in multiple, discrete locations within the 257 miles of rights-of-way identified. Trees and limbs would be hand cut to maintain the root system and all tree debris would be disposed of onsite, along the ROW, using on-site cut, lop and scatter, or chipping/mulching techniques.

No new access roads, skid trails, decking or staging areas would be needed for the work.

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) The proposed action fits within a class of actions listed in Appendix B and Appendix C 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. ¹

/s/ Eric McOmie

Eric McOmie

Natural Resource Specialist (Environmental Compliance)

Concur:

/s/ Katey Grange

Katey C. Grange

NEPA Compliance Officer

Date: October 29, 2025

Attachment(s): Environmental Checklist

¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to the interim final rule to revise DOE NEPA regulations implementing NEPA at 10 C.F.R. Part 1021 and NEPA Implementing Procedures (dated June 30, 2025), to meet its obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

Categorical Exclusion Environmental Checklist

This checklist 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: FY26 Eugene Bundle Vegetation Management Maintenance

Project Site Description

The work areas are existing transmission line rights-of-ways that are primarily private lands, but some tracts are managed by the Army Corps of Engineers, United States Forest Service – Siuslaw and Willamette National Forests, Bureau of Land Management – Northwest Oregon and Coos Bay Districts, Oregon Department of State Lands, and smaller parcels of local government lands. Land use is varied, with suburban, agricultural, forestry, commercial, industrial, and park/recreational uses present along the ROW corridors. The existing transmission rights-of-way are managed for low-growing vegetation species.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA initiated consultation with the Oregon State Historic Preservation Office (SHPO) on 9/15/25. The Oregon SHPO concurred with the APE and the determination of no adverse effect on 10/13/25. No other responses were received within 30 days.

In the unlikely event that cultural material is inadvertently encountered during the implementation of this project, BPA will require that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA and in consultation with the appropriate consulting parties.

Notes: Conduct pre-work survey/monitoring and no mower use in the following spans:

Transmission Line	Spans
Cougar-Holden Creek No 1	1/3 to 1/4; 1/6 to 2/1; 3/1 to 3/2; 5/4 to 5/5; 12/4 to 12/5; 14/5 to 15/1
Holden Creek-Thurston No 1	5/4 to 6/1
Santiam-Alvey 1&2 No 2	47/3 to 47/5; 57/4 to 58/2; 60/4 to 60/5
Albany-Burnt Woods No 1	3/7 to 3/8; 4/2 to 4/3
Santiam-Toledo No 1	35/3 to 35/4; 37/6 to 37/7; 54/1 to 54/2; 57/2 to 58/4; 61/1 to 63/5
Reston-Fairview No 2	9/4 to 9/5; 10/2-10/3; 12/1 to 12/4; 13/3 to 14/3; 15/5 to 16/2; 20/6 to 22/2; 23/5 to 24/1; 24/5 to 26/5; 30/1 to 30/2

2. Geology and Soils

Potential for Significance: No

Explanation: The proposed vegetation management actions do not result in ground disturbance.

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

Potential for Significance: No

Explanation: Site-specific treatment would be applied to maintain existing low-growing plant communities. Project activities would be limited to the already impacted transmission line and access road rights-of-way and would not substantially alter existing plant communities. Existing naturalized grasses and woody shrubs are present on the entire ROW and are expected to naturally seed into the areas that would have lightly-disturbed soil predominantly located on the ROW roads. BPA obtained a species list and determined that while both Kincaid's Lupine and Willamette Daisy are known to occur within the project area, it is consistent with scope of activities identified within USFWS' Biological Opinion (BiOp) and letter of concurrence (LOC) regarding Bonneville Power Administration Routine Inspections and Right-of-Way Maintenance in Western Oregon, Ecosphere Project Code 2023-0041665-S7, dated January 14, 2025.

No impacts to state or federally sensitive species are anticipated because BPA would selectively target only tall-growing woody species and noxious weeds.

Notes:

- Follow the conservation measures and terms and conditions identified during the ESA consultation.

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

Potential for Significance: No

Explanation: In general, the project would have a small impact to wildlife and habitat related to temporary disturbance associated with elevated equipment noise (chain saws and mowers) and human presence. Typically, this temporary disturbance would last less than an hour in any particular treatment segment. With the use of cut, lop, and scatter tree debris disposal, some small animal habitat would be created. Wildlife is anticipated to use adjacent habitat and return to the treatment area soon after the completion of work.

A species list was obtained from the United States Fish and Wildlife Service (USFWS) for federally-listed, proposed, and candidate species potentially occurring within the project boundaries. Occurrences and critical habitat exist in the project area for marbled murrelet, Northern spotted owl, Fender's blue butterfly and Taylor's checkerspot. Based on the ESA review conducted, BPA made a determination that the project would be consistent with scope of activities and action area evaluated in the USFWS' Biological Opinion (BiOp) and letter of concurrence (LOC) regarding Bonneville Power Administration Routine Inspections and Right-of-Way Maintenance in Western Oregon, Ecosphere Project Code 2023-0041665-S7, dated January 14, 2025. All terms and conditions and conservation measures identified in these consultations would be incorporated into the vegetation control cut sheets and other contract documentation.

No additional special-status or sensitive state species were identified, and following the specific conservation measures outlined within USFWS Bi-Op consultation would incidentally minimize potential interactions with any non-ESA-listed sensitive species in the area.

Notes:

- Follow the conservation measures and terms and conditions identified during the ESA consultation.

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

Potential for Significance: No

Explanation: Water bodies (streams, rivers, lakes) occurring in the project area are noted in the vegetation control cut sheets. Herbicide buffers, up to 100 feet, would be established depending on treatment type, potential toxicity, or label advisory for ground or surface water. No aquatic treatments would be conducted. As conservation and avoidance measures where sensitive aquatic species or habitats are present, only spot and localized treatment with Garlon 3A (Triclopyr TEA) would be used within a 100-foot buffer up to the water's edge of any stream containing threatened or endangered fish species or critical habitat. Trees in riparian zones would be selectively cut to include only those that would grow into the minimum approach distances of the conductor at maximum sag; other trees would be left in place or topped to preserved shade. Shrubs that are less than 10 feet high would not be cut where ground to conductor clearance allows. No ground disturbance would occur and root systems would be left intact to prevent sedimentation.

Any effects to ESA-listed anadromous fish are covered by BPA's programmatic biological agreement with the National Oceanic and Atmospheric Administration Endangered Species Act Section 7 Programmatic Conference and Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Rebuild Projects for Transmission Line and Road Access Actions Authorized or Carried Out by the Bonneville Power Administration in Oregon, Washington, and Idaho (WCR-2014-1600, September 22, 2016).

BPA also conducted a review of ESA-listed bull trout populations, under the jurisdiction of the USFWS, that may be present in the project area. BPA determined that the project would be consistent with scope of activities and action area evaluated in the USFWS' Biological Opinion (BiOp) and letter of concurrence (LOC) regarding Bonneville Power Administration Routine Inspections and Right-of-Way Maintenance in Western Oregon, Ecosphere Project Code 2023-0041665-S7, dated January 14, 2025. Streams in the project area with documented presence of bull trout and designated bull trout critical habitat have been noted in the vegetation control cut sheets. All conservation measures identified in this consultation would be incorporated into the vegetation control cut sheets and other contract documentation.

6. Wetlands

Potential for Significance: No

Explanation: Wetlands are denoted in the vegetation control cut sheets. Herbicides would not be applied within wetlands and a buffer up to 100 feet would be established depending on treatment type, potential toxicity, or label advisory for ground or surface water. In those locations with wetlands, appropriate herbicides (mainly Garlon 3A) would be used up to the water's edge, but not over water. No ground disturbance, filling, or excavating of wetlands would occur.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No use of groundwater is proposed. Herbicide applications would be applied by licensed applicators and would follow label instructions to minimize the potential for groundwater contamination. All water used for the proposed project would be obtained from permitted sources. Air gaps or backflow prevention devices would be utilized to prevent potential water source contamination. Herbicide applications would be applied by licensed applicators and would follow label instructions to minimize the potential for groundwater contamination. Where private water wells/springs or agricultural irrigation sources have been identified along the ROW and noted in the vegetation control cut sheets, no herbicide application would occur within a 50-foot radius of the wellhead, spring, or irrigation source (164 feet when using herbicides with ground/surface water advisory).

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: No change in land use would occur. There are no specially-designated areas in the project area; however, project activities have the potential to be visible to the public recreating during vegetation management activities but are not expected to displace or substantially disrupt public land users. Vegetation management activities are localized and short in duration and signage would be used as needed for spray and cutting activities. USFS Offices, BLM and Oregon Department of State Land staff were notified of planned work and acknowledged during the spring and summer of 2025 and did not identify any additional specific measures.

9. Visual Quality

Potential for Significance: No

Explanation: All work would be performed within existing transmission line right-of-way. Vegetation management activities and techniques would be similar to what has occurred during prior prescribed management cycles; therefore, there would be a negligible change to the visual quality of the area.

10. Air Quality

Potential for Significance: No

Explanation: The project would have a limited, temporary impact on air quality from a small amount of vehicle and hand tool emissions and dust generated during vehicle movement.

11. Noise

Potential for Significance: No

Explanation: There would be temporary noise from vehicles and hand equipment that would occur intermittently and last a few hours in each area.

12. Human Health and Safety

Potential for Significance: No

Explanation: The project would remove potential vegetation hazards to the transmission lines, thus reducing outages and wildfire risk. Herbicides would be applied by licensed applicators in accordance with the label instructions and BPA-approved herbicides to limit the potential for public or worker exposure. Trees would be cleared by contractors who are qualified to work around electrical facilities to minimize the risk of trees falling into the lines and causing injury or wildfire.

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 with private landowners, USFS Willamette and Siuslaw National Forest Offices in March 2025, Bureau of Land Management July 2025 and Oregon Department of State Lands in July 2025, via email. No special measures or requirements were identified for treatments on Federally-managed or State-managed lands. Letters, on-site meetings, emails, and phone calls would be used to notify landowners approximately three weeks prior to commencing vegetation management activities. Door hangers would also be used at properties where special treatments are anticipated. Any additional measures

proposed by landowners or land managers through ongoing communication would be incorporated into the vegetation management plan during project implementation.

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

Signed: /s/ Eric McOmie Date: October 29, 2025
Eric McOmie
Natural Resource Specialist (Environmental Compliance)