

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** FY 26 Kalispell District Periodic Vegetation Management: Hot Springs-Rattlesnake No. 1, Hungry Horse – Columbia Falls No. 1, and Hungry Horse - Conkelley No. 1

**PP&A No.:** 6759

**Project Manager:** Kyle Goeke Dee, TFBV-Kalispell

**Location:** Flathead, Lake, Missoula, and Sanders Counties, Montana

**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

**Description of the Proposed Action:** BPA proposes to maintain low growing vegetation communities in specific, localized areas in and adjacent to the Hot Springs – Rattlesnake No. 1, Hungry Horse – Columbia Falls No. 1, and Hungry Horse – Conkelley No. 1 rights-of-way (ROW) in Flathead, Lake, Missoula, and Sanders Counties, Montana. 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.

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 are approximately 125 to 200 feet in width and traverse approximately 70 line miles. Localized areas within the corridors; approximately 200 acres of ROW corridor, 3 miles of access roads, and 340 structure sites of existing transmission ROWs, would be initially treated in the fall of 2025 and 2026.

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. 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 approximately 170 danger trees and 60 corridor trees, in, and immediately adjacent to the ROW. Tree clearing would not be concentrated and would occur in multiple, discrete locations within the ROWs. Trees 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 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. <sup>1</sup>

/s/ Aaron Siemers

Aaron Siemers, EPR-4

Physical Scientist (Environmental)

Concur:

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<sup>1</sup> 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.

/s/ Katey Grange

Katey C. Grange

NEPA Compliance Officer

Date: November 18, 2025

Attachment(s): Environmental Checklist

## **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:** FY 26 Kalispell District Periodic Vegetation Management; Hot Springs-Rattlesnake No. 1, Hungry Horse – Columbia Falls No. 1, and Hungry Horse - Conkelley No. 1

### **Project Site Description**

The proposed action is located within Flathead, Lake, Missoula, and Sanders Counties, Montana. This region is characterized by diverse landscapes, located in the Northern Rockies, Middle Rockies, and Canadian Rockies ecosystem of western Montana. Vegetative communities include various coniferous and pine species typical of the Rocky Mountain ecosystem, as well as high elevation grasslands of the Camas Valley and Flathead Valley ecoregions. The Project Area includes privately-owned land, as well as federal lands including those managed by the U.S. Forest Service, Lolo National Forest and Flathead National Forest, and tribal lands of the Confederated Salish and Kootenai Tribes of the Flathead Nation. Land use in the project area varies from agricultural and rural residential, to private remote land tracts, private timber production and public and tribally held conservation areas.

The proposed action would occur within, and immediately adjacent to, BPA rights-of-way (ROWs) and access roads for the Hot Springs-Rattlesnake No. 1, Hungry Horse – Columbia Falls No. 1, and Hungry Horse - Conkelley No. 1 transmission lines. BPA possesses easement rights for the operation and maintenance of these transmission lines and their associated access roads. This transmission corridor is maintained to control tall-growing vegetation, promoting low-growing species. The topography the transmission line corridor crosses ranges from river valleys and plains to mountainous terrain. Elevations can vary substantially depending on the specific location within the project area. The project area contains numerous waterways, some of which are fish-bearing, and various wetland areas are also present. The project area contains habitat for species protected under the Endangered Species Act (ESA), such as grizzly bear, Canada lynx, and bull trout. Portions of the project area overlap with the Northern Continental Divide Ecosystem grizzly bear recovery zone.

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

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

Potential for Significance: No

Explanation: The proposed actions were found to have either no potential to cause effect (manual cut lop and scatter or herbicide application) or no adverse effect to historic properties based on the implementation of monitoring and/or pre-work surveys. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, on October 10, 2025, BPA initiated consultation with: the Coeur d'Alene Tribe, the Confederated Salish and Kootenai Tribes, the Montana State Historic Preservation Office (SHPO), the U.S. Forest Service (Flathead National Forest, Lolo National Forest), the Montana Department of Transportation, the Montana Department of Fish, Wildlife, and Parks. The Montana SHPO provided a written concurrence to the BPA No Adverse Effects

finding on November 6, 2025. No additional responses were received from the consulting parties 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.

## **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.

In order to comply with Section 7 of the Endangered Species Act (ESA), BPA obtained an official species list for the proposed action on October 7<sup>th</sup>, 2025. Whitebark pine, Spalding's catchfly, and Ute Ladies' tresses are listed under the ESA for the project area. BPA determined that the proposed action would have a "No effect" on Spalding's catchfly and Ute Ladies' tresses, as there is not suitable habitat or recorded observations of these plants in the project area. For whitebark pine, the proposed action and effects to endangered species is consistent with the Section 7 consultation documented by BPA's November 2020 Biological Assessment (BA) for Canada Lynx, Grizzly Bear, Bull Trout and White Sturgeon and the associated U.S. Fish and Wildlife Service (USFWS) Letter of Concurrence dated April 16, 2021 (06E11000-2021-I-0365), as well as the August 2022 BA for Yellow-billed Cuckoo, Canada Lynx, Grizzly Bear, Bull Trout, Monarch Butterfly, and Whitebark Pine, and Spalding's Catchfly, and the associated letter of concurrence dated October 19, 2022 (2022-0090873).

No special-status state or federally sensitive species would be significantly affected by the proposed action.

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

Potential for Significance: No with Conditions

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.

In order to comply with Section 7 of the ESA, BPA obtained an official species list for the proposed action on October 7th, 2025. Canada lynx, grizzly bear, North American wolverine, and yellow-billed cuckoo are listed under the ESA for the project area. No designated critical habitat for wildlife is present in the project area. The proposed action and effects to endangered species is consistent with the Section 7 consultation documented by BPA's November 2020 BA for Canada Lynx, Grizzly Bear, Bull Trout and White Sturgeon and the associated U.S. Fish and Wildlife Service (USFWS) Letter of Concurrence dated April 16, 2021 (06E11000-2021-I-0365), as well as the August 2022 BA for Yellow-billed Cuckoo, Canada Lynx, Grizzly Bear, Bull Trout, Monarch Butterfly, Whitebark Pine, and Spalding's Catchfly, and the associated letter of concurrence dated October 19, 2022 (2022-0090873).

No special-status state or federally sensitive species would be significantly affected by the proposed action.

Notes:

- BPA would implement timing restrictions and other conservation measures documented in the project's ESA consultation to minimize potential impacts to wildlife protected under the Endangered Species Act.

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

Potential for Significance: No with Conditions

Explanation: The project area intersects multiple waterways and floodplains as it traverses approximately 70 linear miles in western Montana. In some cases, these crossings occur as the transmission line spans canyons and valleys at high elevations, therefore potential impacts to the waterways are unlikely. However, the project does cross the Flathead River, which is listed as bull trout designated critical habitat, in a few locations along the Hungry Horse – Conkelley No. 1 and Hungry Horse – Columbia Falls No. 1 transmission lines. The Hot Springs-Rattlesnake No. 1 line crosses Grant Creek, listed as bull trout designated critical habitat, in line mile 56. Appropriate herbicides would be used within these locations according to label instructions and applicable ESA consultation minimization measures would be implemented, including herbicide buffers. Herbicide buffers would also be applied to all intermittent and perennial streams in the project area. No ground disturbance would occur and root systems would be left intact to prevent sedimentation.

For impacts to bull trout, the proposed action and effects to the species is consistent with the Section 7 consultation documented by BPA's November 2020 BA for Canada Lynx, Grizzly Bear, Bull Trout and White Sturgeon and the associated U.S. Fish and Wildlife Service (USFWS) Letter of Concurrence dated April 16, 2021 (06E11000-2021-I-0365), as well as the August 2022 Biological Assessment for Yellow-billed Cuckoo, Canada Lynx, Grizzly Bear, Bull Trout, Monarch Butterfly, Whitebark Pine, and Spalding's Catchfly, and the associated letter of concurrence dated October 19, 2022 (2022-0090873).

Notes:

- Herbicide buffers would be implemented near all bull trout resident streams and designated critical habitat.
- Trees felled near riparian areas, as applicable, would be felled toward the water to promote fish habitat.
- Root systems in riparian areas would not be disturbed.

## **6. Wetlands**

Potential for Significance: No

Explanation: Wetlands are present in some of the treatment areas. 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. Further, herbicides would not be applied within 50 feet of known groundwater wells and water sources.

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

Potential for Significance: No

Explanation: No change in land use would occur. No specially-designated areas are present in the work areas. No disruption to the use of U.S. Forest Service (USFS) or tribally-managed lands would occur.

## **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 USFS, Lolo National Forest and Flathead National Forest, and the Confederated Salish and Kootenai Tribes of the Flathead Nation. No special measures or requirements were identified for treatments on federally-managed or tribally-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/ Aaron Siemers

Aaron Siemers

Physical Scientist (Environmental)

Date: November 18, 2025