

## Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** FY26 The Dalles District Vegetation Management

**PP&A No.:** 6756

**Project Manager:** Jacob Marti – TFBV-THE DALLES

**Location:** Skamania and Klickitat Counties, Washington and Hood River, Wasco, Sherman, Gilliam and Wheeler 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...

**Description of the Proposed Action:** BPA proposes to maintain low growing vegetation communities in specific, localized areas in and adjacent to segments of the Big Eddy-McLoughlin No 1&2, Big Eddy-Ostrander No 1, Big Eddy-Troutdale No 1, John Day-Marion No 1, John Day-Big Eddy No 1, Big Eddy-Spring Creek No 1, Spearfish Tap to Chenoweth-Goldendale No 1, Harvalum-Big Eddy No 1, Bonneville PH 1-Hood River No 1, Cascade Locks Tap to Bonneville PH 1-Hood River No 1, Hood River-The Dalles No 1, De Moss-Fossil No 1, John Day-Grizzly No 1, McNary-Ross No 1, McNary-John Day No 2, Wautoma-Knight No 1, North Bonneville-Midway No 1, Wautoma-Rock Creek No 1, Rock Creek-John Day No 1, Horse Heaven-Harvalum No 1, Knight-Ostrander No 1, Carson Tap to Underwood Tap, Underwood Tap to Bonneville PH 1-Alcoa No 1&2 and Big Eddy-De Moss No 1 rights-of-way (ROW; see Treatment Area attachment) in Skamania and Klickitat Counties, Washington and Hood River, Wasco, Sherman, Gilliam and Wheeler Counties, Oregon. Many of these transmission line ROWs share the same corridor. 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. Portions of these ROWs analyzed in this Categorical Exclusion are identified in the table below.

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 consistently 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 approximately 280 miles in length. Localized areas within an approximate 2,850 acres, 8 miles of access roads, and 920 structure sites of

existing transmission line and access road rights-of-way would be initially treated in fall 2025 through fall 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. A follow-up treatment of re-sprouting target vegetation would be conducted by summer 2026. 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 250 danger trees (DT) in, or adjacent to, the ROW. Tree clearing would not be concentrated and occur in multiple, discrete locations within the 280 miles of rights-of-way. 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.<sup>1</sup>

/s/ Samantha Rinker

Samantha Rinker

Biological Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey C. Grange

NEPA Compliance Officer

Date: December 5, 2025

Attachment(s):

Sensitive Species and Cultural Resources Conservation Measures

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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.

## Treatment Locations

Corridor	Transmission Line	Spans	
BEMA_BIGE-OSTD-1	Big Eddy-McLoughlin No 1&2	39/1	39/2
BEMA_BIGE-OSTD-1	Big Eddy-Ostrander No 1	15/2	15/3
BEMA_BIGE-OSTD-1	Big Eddy-Troutdale No 1	14/4	36/2
BEMA_JDAY-MARN-1_B	John Day-Marion No 1	55/3	55/4
BEMA_JDAY-BIGE-1	John Day-Big Eddy No 1	0/1	19/2
BEMA_BIGE-SPCK-1_A	Big Eddy-Spring Creek No 1	2/3	5/3
BEMA_BIGE-SPCK-1_A	Spearfish Tap to Chenoweth-Goldendale No 1	0/1	4/3
BEMA_HRVL-BIGE-1	Harvalum-Big Eddy No 1	15/2	24/2
BEMA_BOPH-HORV-1	Bonneville PH 1-Hood River No 1	0/1	24/4
BEMA_BOPH-HORV-1	Cascade Locks Tap to Bonneville PH 1-Hood River No 1	1/1	1/2
BEMA_HORV-TDAL-1	Hood River-The Dalles No 1	7/1	8/2
BEMA_DEMO-FOSS-1	De Moss-Fossil No 1	1/1	53/12
BEMA_BIGE-SPCK-1_B	Big Eddy-Spring Creek No 1	10/2	37/1
BEMA_JDAY-GRIZ-1_A	John Day-Grizzly No 1	35/5	38/1
BEMA_MCNY-ROSS-1_B	McNary-Ross No 1	48/4	68/6
BEMA_MCNY-ROSS-1_B	McNary-John Day No 2	65/2	68/1
BEMA_MCNY-ROSS-1_A	McNary-Ross No 1	75/3	141/3
BEMA_MCNY-ROSS-1_A	Big Eddy-Spring Creek No 1	5/3	5/4
BEMA_MCNY-ROSS-1_A	Spearfish Tap to Chenoweth Goldendale No 1	4/3	4/4
BEMA_WAUT-KNIT-1	Wautoma-Knight No 1	58/5	73/5
BEMA_WAUT-KNIT-1	North Bonneville-Midway No 1	74/5	75/1
BEMA_RKCR-JDAY-1	McNary-Ross No 1	68/6	69/1
BEMA_RKCR-JDAY-1	McNary-John Day No 2	75/2	76/3
BEMA_RKCR-JDAY-1	Harvalum-Big Eddy No 1	0/1	1/3
BEMA_RKCR-JDAY-1	Wautoma-Rock Creek No 1	63/4	65/5
BEMA_RKCR-JDAY-1	Rock Creek-John Day No 1	0/1	13/1
BEMA_RKCR-JDAY-1	Horse Heaven-Harvalum No 1	58/2	58/5
BEMA_KNIT-OSTD-1_A	McNary-Ross No 1	116/3	116/4
BEMA_KNIT-OSTD-1_A	Knight-Ostrander No 1	18/1	67/1
BEMA_NBON-MIDW-1	Carson Tap to Underwood Tap	1/1	1/1.1
BEMA_NBON-MIDW-1	North Bonneville-Midway No 1	1/3	24/2
BEMA_KNIT-OSTD-1_A	North Bonneville-Midway No 1	24/3	29/4
BEMA_KNIT-OSTD-1_B	North Bonneville-Midway No 1	29/4	74/5
BEMA_KNIT-OSTD-1_A	Underwood Tap to Bonneville PH 1-Alcoa No 1&2	12/1	26/27
BEMA_BIGE-DEMO-1	Big Eddy-De Moss No 1	1/7	24/17

## 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 The Dalles District Vegetation Management**

#### **Project Site Description**

The Dalles Vegetation Management District spans several ecoregions in northwestern Oregon and southwestern Washington. The area encompasses portions of the Western Cascades lowlands, valleys and mountains, the Eastern Cascades slopes and foothills, the Columbia Plateau, and the Columbia River Gorge.

The work areas are existing transmission line rights-of-ways that are primarily in urban, suburban, rural-residential, agricultural, timber lands, commercial, industrial, and undeveloped properties as well as land managed by local governments, the United States Forest Service (USFS), Bureau of Land Management (BLM), the Washington Department of Natural Resources (DNR), and Oregon State Parks.

Several transmission line corridors run through the Columbia River Gorge National Scenic Area (CRGNSA), managed by the USFS.

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

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 November 4, 2025, BPA initiated consultation with: the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of Grand Ronde, the Confederated Tribes of the Umatilla Indian Reservation, the Nez Perce Tribe, the Confederated Tribes of the Warm Springs Reservation of Oregon, the Bureau of Land Management, the U.S. Forest Service (Columbia River Gorge National Scenic Area), the Washington Department of Fish and Wildlife, the Washington Department of Natural Resources, the Washington State Parks and Recreation Commission, the Washington Department of Archaeology and Historic Preservation (DAHP), the Oregon Department of State Lands (ODSL), the Oregon Parks and Recreation Department, Oregon Department of Fish and Wildlife, and the Oregon State Historic Preservation Office (SHPO). The ODSL and SHPO confirmed receipt of the letters on November 5, 2025, The DAHP provided a written concurrence to the BPA No Adverse Effects finding on November 17, 2025. The ODFW responded with no comments on November 21, 2025. No additional responses were received from the consulting parties within 30 days.

Notes:

- Implement monitoring, pre-work surveys, and restrict off-road travel in certain locations specified in the cut sheets and associated minimization and conservation measures attachment.

## **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. There would be No Effect to Endangered Species Act (ESA)-listed plant species. No impacts to state or federally sensitive species are anticipated because they are either not likely to be present in the project area, or if they may be present, the disturbance caused by crushing or mowing would be limited and brief enough in duration to not have any lasting impacts. Herbicide applications are highly localized and focused on the treatment of noxious and non-compatible, non-sensitive plant species.

## **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 on 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.

Pursuant to its obligations under the ESA, BPA made a determination of whether its proposed project would have any effects on any listed species. A species list was obtained for federally-listed, proposed, and candidate species potentially occurring within the project boundaries from the United States Fish and Wildlife Service (USFWS). Based on the ESA review conducted, BPA made a determination that the project would have “No Effect” for yellow-billed cuckoo. BPA made a determination of “May effect, not likely to adversely affect” for gray wolf, North American wolverine, and northern spotted owl and its critical habitat. BPA made a determination of “May adversely affect individuals and habitat, not likely to result in jeopardy of the species” for monarch butterfly, Suckley’s cuckoo bumble bee and northwestern pond turtle.

The proposed vegetation management activities in Washington are within the scope of activities and action area evaluated in the U.S. Fish and Wildlife Service’s (USFWS) letter

of concurrence (LOC) regarding: BPA Southern Washington Periodic Vegetation Management, consultation number 2023-0081437, sent to BPA in August of 2023, and conservation measures would be implemented and included on the cut sheet. The proposed vegetation management activities in Oregon are within the scope of activities and action area evaluated in the U.S. Fish and Wildlife Service's (USFWS) Biological Opinion (BiOp) 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 this consultation would be implemented and included on the cut sheet.

No impacts to state or federally sensitive species are anticipated because they are either not likely to be present in the project area, or if they may be present, the proposed work would be limited and brief enough in duration to not have any lasting, population-level impacts.

Notes:

- Implement all conservation measures listed in the attached Sensitive Species Conservation Measures document.

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

Potential for Significance: No

Explanation: Streams in the project area with documented presence of ESA-listed fish, designated critical habitat for one or more species, and/or identified as EFH have been noted in the Vegetation Control Cut Sheet. Appropriate herbicides would be used within these locations according to label instructions and applicable ESA consultation minimization measures, including buffer distances. No ground disturbance would occur and root systems would be left intact to prevent sedimentation. Any effects to ESA-listed anadromous salmonids are covered by BPA's programmatic biological opinion 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). It was determined that, by complying with the project design criteria listed within the SLOPES PBO, potential effects to ESA-listed anadromous salmonids and EFH would be consistent with those evaluated and addressed in the SLOPES PBO.

Bull trout and bull trout critical habitat are on the USFWS's species list for Washington. Based on the ESA review conducted, bull trout and bull trout critical habitat are only documented in one stream in the action area. Therefore, BPA made a determination of "May effect, not likely to adversely affect" for bull trout and bull trout critical habitat. The proposed vegetation management activities are within the scope of activities and action area evaluated in the U.S. Fish and Wildlife Service's (USFWS) letter of concurrence (LOC) regarding: BPA Southern Washington Periodic Vegetation Management, consultation number 2023-0081437, sent to BPA in August of 2023. All conservation measures would be implemented and included on the cut sheet.

Notes:

- Implement all conservation measures listed in the attached Sensitive Species Conservation Measures document.

## **6. Wetlands**

Potential for Significance: No

Explanation: Wetlands may be present in 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 lands managed by USFS, BLM, DNR, Oregon State Parks or the CRGNSA 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: The USFS was notified of the planned work within National Forest System lands and lands within the Columbia River Gorge National Scenic Area. No proposed work will proceed on USFS land until coordination between USFS and BPA is completed (anticipated early December 2025). No special measures or requirements were identified for treatments on USFS-managed lands. BLM, DNR and State Parks were notified of the planned work on their lands and have no comments or concerns. 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/ Samantha Rinker

Samantha Rinker  
Biological Scientist (Environmental)

Date: December 5, 2025