

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Applegate Butte Radio Site Access Road Improvement Project

**PP&A No.:** 6271

**Project Manager:** Ariel Kramer – TELF-TPP-3

**Location:** Klamath County, Oregon

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

**Description of the Proposed Action:** BPA proposes to perform routine road maintenance, repair and improvements on the Applegate Butte Radio Site Access Road. BPA is proposing to maintain the gravel road within its existing access right-of-way (Road NF-220) along its entire 2.5-mile (13,300 ft) length from Road NF-4518 to the terminus atop Applegate Butte. This work is proposed within the existing roadway prism. In addition, the project would replace 18 rock water bars with rubber water bars within the existing road prism. The described road maintenance activities are proposed for construction in summer 2026 construction season. No in-water work would be conducted.

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 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/ Oden Jahn

Oden Jahn

Physical Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey C. Grange

Date: January 20, 2026

NEPA Compliance Officer

Attachment(s): Environmental Evaluation

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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.*

# **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:** Applegate Butte Radio Site Access Road Improvement Project

## **Project Site Description**

The proposed project is located in rural Klamath County, Oregon, approximately 11 miles northeast of the city of Chiloquin. Land ownership within the project area includes U.S. Forest Service (USFS) property on the Freemont-Winema National Forest and privately held lands. Land use within the project vicinity includes open space, forested areas, and cattle grazing. The approximate site elevation is between 4,140 and 7,270 feet above sea level. The project area includes the spur road from USFS 9718 to the radio site, which traverses lodgepole pine (*Pinus contorta*)-dominated coniferous forest habitat at the higher elevations.

## **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, BPA developed an Area of Potential Effects (APE) and initiated consultation on September 8, 2025, with the Klamath Tribes, the Burns-Paiute Tribe, the Fort Bidwell Indian Community of California, and the Oregon State Historic Preservation Office (SHPO) and determined the proposed undertaking would result in no adverse effects to historic properties. On September 9, 2025, the SHPO concurred with BPA's delineation of the APE and the determination of no adverse effect. On October 9, 2025, the 30-day response period expired. No other comments were received from consulting parties.

Notes:

- A cultural monitor would be present during road improvements and flagging be installed along the road where areas of concern are present.
- In the unlikely event that cultural material is encountered during the implementation of this project, BPA's Post-Review Discovery Protocol document should be followed, which would 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 project includes laying gravel on an existing road prism and installing 18 rubber water bars to improve drainage. The proposed roadway improvements would likely conserve soil resources by reducing soil erosion within the roadway. The water bars would not connect to other aquatic resources. No prime or unique farmlands would be affected. Therefore, the proposed action would have limited temporary impacts to geology and soils.

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

Potential for Significance: No

Explanation: There are no Federally-listed plants or state special-status plant species of habitats that have been documented in the project area. The project would be limited to the existing

road prism and turnouts and does not have the potential to disturb vegetation outside of this area.

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

Potential for Significance: No

Explanation: Local wildlife such as small mammals, birds and deer in the project area may be temporarily disturbed by proposed construction actions. Surrounding landscape would provide ample space and habitat if any species were to be temporarily displaced. All work would occur in the existing access road that is normally open to the public. To assess potential project effects to species protected under the ESA, BPA obtained an official species list from the U.S. Fish and Wildlife Service on December 18, 2025. BPA determined that the project would have “No Effect” to ESA-protected wildlife and insects. No state-listed or USFS sensitive plants are documented in the project area

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

Potential for Significance: No

Explanation: Project activities are located in upland areas away from waterbodies, floodplains, listed fish species, or their habitat, and are not expected to impact these types of resources.

#### **6. Wetlands**

Potential for Significance: No

Explanation: Project activities are located in upland areas and are not expected to impact wetlands.

#### **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Project activities are not expected to impact groundwater or aquifers.

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

Potential for Significance: No

Explanation: No specially designated areas were identified within the project limits. The project is not expected to result in changes or impacts to land use or specially designated areas.

#### **9. Visual Quality**

Potential for Significance: No with Conditions

Explanation: Construction activities may temporarily generate dust if conditions are dry at the time of construction. Generated dust may temporarily diminish the visual quality of the area, but conditions would resume soon after construction.

Notes:

- A fugitive dust control plan would be developed and implemented if construction activities are expected to produce dust.

#### **10. Air Quality**

Potential for Significance: No with Conditions

Explanation: The proposed project would utilize conventional equipment powered by petroleum fuels. Exhaust would temporarily impact air quality in the immediate vicinity while the equipment is in operation. Dust creation would be isolated to small areas and in short

duration. Water would be used for dust suppression if needed. Baseline air quality conditions are expected to return shortly after project activities cease.

Notes:

- A fugitive dust control plan would be developed and implemented if construction activities are expected to produce dust.

## 11. Noise

Potential for Significance: No

Explanation: Project would produce localized noise associated with the use of construction equipment. During project activities, work would take place during daylight hours, for approximately eight hours per day. The project would be relatively short in duration – approximately two weeks. The baseline operational noise of the transmission line would not change.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: The construction contractor would develop a site-specific health and safety plan to address any hazards during the proposed work. The proposed work is necessary to ensure ongoing operation of the BPA radio site. Project activities are not expected to impact human health or safety.

### **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 project traverses U.S. Forest Service property within the Freemont-Winema National Forest. The BPA Realty Specialist notified the USFS Fremont-Winema National Forest District Office in January 2024 and April 2024 regarding the proposed work. On January 14, 2026, BPA received authorization from the USFS to conduct the proposed project. BPA must follow USFS fire prevention and suppression requirements.

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

Signed: /s/ Oden Jahn                      Date: January 20, 2026  
Oden Jahn  
Physical Scientist (Environmental)