

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: FY26 Westside Substation Defensible Space Vegetation Management

PP&A No.: 7140

Project Managers:

Jake Grinolds, Natural Resource Specialist – TFBV-SNOHOMISH
Jason Hunt, Natural Resource Specialist – TFBV-COVINGTON
Brian Luis, Natural Resource Specialist – TFBV-ROSS-MHQA
Carlos Mora-Flores, Natural Resource Specialist – TFBV-ALVEY
Justin Olmsted, Natural Resource Specialist – TFBV-CHEMAWA

Location: see table within the Proposed Action Description

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B1.3 Routine Maintenance; USDA-35d-USFS Harvest of live trees not to exceed 70 acres...;

Description of the Proposed Action: The Bonneville Power Administration (BPA) proposes to selectively clear vegetation up to 200 feet around 27 substations to create a defensible space barrier and minimize wildfire risk on private property and Federal lands maintaining safety and reliability at the facilities. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the substations. See the table below for locations:

District	Substation	State	Counties
Covington	Maple Valley	WA	King
Eugene	Rogue, Hauser, Tahkenitch, Toledo, Martin Creek, Wendson, Lookout Point	OR	Curry, Coos, Douglas, Lane, Lincoln, Marion
Longview	Ostrander, Allston, Cardwell, St. Johns	WA & OR	Clackamas, Columbia, Cowlitz, Multnomah
Olympia	Kitsap, Chehalis	WA	Kitsap, Lewis
Salem	Timber, McMinnville, Marion, Adair, Tumble Creek, Oregon City, Pearl, Salem	OR	Benton, Clackamas, Polk, Washington, Yamhill
Snohomish	Fidalgo, Lopez, Murray, Bellingham, Sno-King	WA	Skagit, Snohomish

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 and danger trees that show immediate danger of falling onto substation infrastructure (defined and identified by LiDAR mapping). The action area is up to 200 feet and highly dependent on the surrounding site conditions and prescribed needs at each facility. Some vegetation would remain in buffer zones deemed by the District's Natural Resource Specialist if assessed as compatible species that do not pose future risk on case-by-case basis. The proposed action would increase

resilience and reliability of transmission assets while also providing safety to external landowners and the general public. 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.

BPA has developed treatment guidelines for defensible space buffer zones defined by exterior linear feet distances from the substation perimeter fence:

Immediate zone - From 0 to 10 feet: Maintenance of weed free graveled area. This graveled area is already actively managed by bareground spray contracts to maintain a weed-free environment devoid of combustible or flammable material.

Intermediate zone - From 10 to 50 feet: Removal of woody-stemmed vegetation (*i.e.*, trees and shrubs). Dispose of heavy accumulations of ground litter/debris. Removal of dead plants and tree material would be removed. Dead plant and tree material would be chipped and hauled to reduce ground fuel risk. Maintain for a short grasses or forbs-only condition.

Security zone - From 50 to 100 feet: Removal of ladder fuels (vegetation under trees) so a surface fire cannot reach the crowns. Prune trees up to six to ten feet from the ground. Dispose of heavy accumulations of ground litter/debris. Dead plants and tree material would be chipped and hauled. Space trees to have a minimum of eighteen feet between crowns with the distance increasing with the percentage of slope. Trees within the Security zone can be removed if it is determined leaving them would create unacceptable risk to the perimeter fence, equipment within the substation, or other BPA facilities.

Fall Into zone – Up to 200 feet (width varies with height of trees): Trees tall enough now, or in the near future, to fall onto and damage the perimeter fence, or fall into the substation and cause an outage or damage transformers and other critical energized equipment or facilities would be cut and removed.

The substations in the proposed project area reside within 6 operation and maintenance (O&M) Transmission districts in Oregon and Washington. Localized areas within 200 feet of the substation fenceline would be initially treated in the summer and fall of 2026. Additional vegetation management may be necessary in subsequent years in discrete areas of noxious weeds, where BPA personnel discover vegetation that poses a hazard to the substation, or as part of the regularly scheduled maintenance cycles.

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 Fall of 2026, any further herbicide treatment would be assessed and completed under regular scheduled maintenance cycles. 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.

Up to remove 889 trees adjacent to substations would be cut. Trees and limbs would be hand cut to maintain the root system and all tree debris would be disposed of using manual 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 the current *DOE National Environmental Policy Act (NEPA) Implementing Procedures*, 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 and DOE NEPA Implementing Procedures;
- 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/ Eric McOmie

Eric McOmie

Natural Resource Specialist (Environmental Compliance)

Concur:

/s/ Katey C. Grange

Katey C. Grange

NEPA Compliance Officer

Date: August 3, 2026

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: FY26 Westside Facilities Substation Defensible Space Vegetation Management

Project Site Description

Each individual substation facility has a unique footprint, comprised of transmission assets, electrical equipment and size, and underlying land ownership has been identified as BPA fee-owned property. Vegetation would be selectively cleared up to 200 feet around 27 substations on BPA fee-owned lands, or in the case of Tumble Creek Substation, where we have a permit from the USFS Willamette National Forest. The surrounding areas of the facilities are public (Willamette National Forest and US Army Corps of Engineers' managed lands) and private lands with moderate to heavily forested landscapes within a mix of residential, urban, agricultural and rural environments.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA initiated consultation with the Lummi National, the Swinomish Indian Tribal Community, the Samish Indian Nation, the Sauk-Suiattle Indian Tribe, the Stillaguamish Tribe of Indians, the Tulalip Tribes, the Muckleshoot Indian Tribe, the Confederated Tribes of the Chehalis Reservation, the Cowlitz Indian Tribe, the Jamestown S'Klallam Tribe, the Muckleshoot Indian Tribe, the Nisqually Indian Tribe, the Port Gamble S'Klallam Tribe, the Puyallup Tribe of Indians, the Snoqualmie Indian Tribe, the Squaxin Island Tribe, the Suquamish Tribe, the Tulalip Tribes, the Confederated Tribes of Grand Ronde, the Washington State Department of Archaeology and Historic Preservation (DAHP), the Confederated Tribes of the Coos, Lower Umpqua & Siuslaw Indians, the Coquille Indian Tribe, the Confederated Tribes of Siletz Indians, the Cow Creek Band of Umpqua Tribe of Indians, the Confederated Tribes of the Warm Springs Reservation of Oregon, and the Oregon State Historic Preservation Office (SHPO) within separate letters dated May 19, May 26, and June 6, 2026, distributing cultural survey reports and determination letters. BPA received correspondence from the Washington DAHP, the Snoqualmie Tribe, Oregon SHPO, the Cow Creek Tribe, the Suquamish Indian Tribe, the Squaxin Island Tribe, the Confederated Tribes of the Grand Ronde Community of Oregon, and the Cowlitz Indian Tribe. Responding parties concurred with the determination of no adverse effect and did not identify any concerns. No other responses were received within 30 days, which ended on July 6, 2026.

In the unlikely event that cultural material is inadvertently encountered during the implementation of this project, BPA 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 proposed vegetation management actions do not result in ground disturbance as activities are above ground, including light maintenance actions removing vegetation, and no heavy equipment or tracked vehicles are required for tree removal. Mowing deck heights would be adaptively manipulated based on terrain to ensure adequate ground clearance.

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

Potential for Significance: No

Explanation: Western lily is known to occur broadly outside of the Rogue substation, but vegetation is selectively removed with no mowing or herbicide associated at that site. Crews and the Natural Resource Specialist have been educated to positively identify plant species and the immediate surrounding area does not provide suitable habitat for the lily due to the dense forested cover. Additionally, the Willamette Valley daisy and Kincaid's lupine also occurs in the nearby vicinity of Salem substation, but no mowing or herbicide is proposed at the facility. Further, this facility only has 2 trees being removed, and the likelihood of felling these trees and crushing individuals is unlikely as the surrounding area is not adequate prairie habitat within the known range of both species. No impacts to state or federally sensitive species are anticipated because localized treatment using manual cutting would be applied to specific areas and are not known to occur in the immediate work areas, and equipment would be cleaned when moving between required locations. Project activities would be limited to 200 feet within boundary exterior of perimeter fencing, and negligible effect to forested areas as the selected danger trees have a large range of varying clustered characteristics and diameter-breast-height age classes. The total affected acreage is being split across the 27 geographically distinct areas including 18.6 acres requiring manual cut, lop, and scatter, 11.6 acres of mowing, 2.9 acres of herbicide application, and 2.7 acres of chipping with most cases having less than a 0.5 acre of each prescribed work type at each facility. Existing naturalized grasses and woody shrubs are present in these areas and are expected to naturally seed into the areas that would have lightly-disturbed soil. There would be no effect to Endangered Species Act (ESA)-listed plant species.

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

Potential for Significance: No

Explanation: An official species list was generated by the USFWS on July 1, 2026, for the project area and due to a lack of proximity, unsuitable and previously developed suburban project areas, habitat for gray wolf, Columbia white-tailed deer, wolverine, Pacific marten, marbled murrelet, northern spotted owl, streaked horned lark, western snowy plover, yellow-billed cuckoo, Fenders' blue butterfly, Franklin's bumble bee, and island marble butterfly, BPA made the determination of No Effect to ESA Species. No known, surveyed instance, or suitable habitat is within a mile of any substation within the project area.

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 a couple

hours at any substation cumulatively considering all work types. With the use of cut, lop, and scattered tree debris disposal in some locations, some small animal habitat would be created. Wildlife are anticipated to use adjacent habitat and return to the treatment area soon after the completion of work, as described in Section 3 above, it is anticipated that less than an acre of wildlife habitat would be effected by vegetation management activities at each site. There would be no effect to Endangered Species Act (ESA)-listed wildlife species and no state or federally-sensitive species are observed within the project boundaries or immediate surrounding areas. The project has no designated critical habitat within it.

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

Potential for Significance: No

Explanation: No water bodies or floodplains are located within the proposed project area activities. Herbicide spray activities are limited to 6 facilities (Ostrander, Allston, Cardwell, St. Johns, Kitsap, and Chehalis). Each of the prescribed herbicide areas are greater than 500 feet away from any waterway, so there would not be a direct pathway for overspray, drift or discharge. No cutting activities would take place within riparian areas.

6. Wetlands

Potential for Significance: No with conditions

Explanation: Wetlands may be present in the treatment areas. In those locations with wetlands, appropriate herbicides (mainly Garlon 3A) would be used up to the water's edge, but not over water. Herbicide use is proposed at Ostrander, Allston, Cardwell, St. Johns, Kitsap, and Chehalis substations. Trees may be cut within wetland areas but would be done in a manner to avoid ground disturbance. Tree cutting would be selective and would not result in full conversion of forested wetlands to herbaceous or shrub wetland communities. No ground disturbance, filling, or excavation of wetlands would occur.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: All activities would be above ground and no ground disturbance is anticipated. 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. All project areas are within BPA fee-owned property and no special designations occur within. Any disruption to adjacent land use would be temporary in nature, with hand crews' presence being limited to a couple hours at each facility to complete the maintenance activities.

9. Visual Quality

Potential for Significance: No

Explanation: Some stands of trees in the adjacent area around substations would be thinned or removed by design, changing the visual aesthetic for some property owners near the proposed work sites. After reviewing the proposed trees to be cut, the impact would be minimal as the removals are very selective in nature and does not encompass clear-cutting of large swathes. The visual aesthetic for adjacent property owners of the facilities would not be heavily modified. Vegetation management activities and techniques would be similar to what occurred during prior prescribed management cycles in the immediate corridor areas entering and leaving the substations; therefore, changes to the area would still be minimal with not enough danger trees being selectively removed to substantially alter the surrounding landscape.

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 and fuel loading to the surroundings of facilities, thus reducing possible outages and wildfire risk. The proposed work is necessary to ensure safe and reliable operation of BPA transmission facilities and increase fire resiliency for surrounding property owners, increasing their own defensible space. Herbicides would be applied by licensed applicators in accordance with the label instructions and only BPA-approved herbicides would be used 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 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 notified the U.S. Army Corps of Engineers and United States Forest Service as their property is adjacent to BPA-fee-owned property where vegetation management is to occur. No special measures or requirements were identified for treatments near federally-managed lands. Letters, on-site meetings, emails, and phone calls would be used to notify adjacent landowners, including private 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: August 3, 2026
Eric McOmie
Natural Resource Specialist (Environmental Compliance)