# Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

**Proposed Action:** Alvey District FY27 Vegetation Management

**PP&A No.:** 7020

**Project Manager:** Carlos Mora Flores- TFBV-ALVEY

**Location:** Coos, Douglas, Lane, and Linn counties, Oregon

**Categorical Exclusion Applied (from 10 C.F.R. Part 1021 Appendices B and C):** B1.3 Routine Maintenance; USDA-35d-USFS Harvest of live trees not to exceed 70 acres…; USDA-36d-USFS 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 Albany-Eugene No. 1, Eugene-Alderwood No. 1, Halsey Mill N Tap to Albany-Eugene No. 1, Halsey Mill S Tap to Albany-Eugene No. 1, Harrisburg Tap to Albany-Eugene No. 1, Junction City Tap to Albany-Eugene No. 1, Parker Tap to Eugene-Alderwood No. 1, Albany-Bureau of Mines No. 1, Albany-Lebanon No. 1, Albany Substation Tie No. 1, Froman Tap to Albany-Lebanon No. 1, Alvey Capacitor Tie No. 1, Eugene-Alvey No. 2, Hawkins-Alvey No. 1, Hideaway Tap to Hawkins-Alvey No. 1, Alvey-Lane No. 1, Lane-Wendson No. 1 & 2, Rainbow Valley Tap to Lane-Wendson No. 1, Santiam-Albany No. 1, Coos Tap to Reedsport-Fairview No. 1, Hauser Tap to Reedsport-Fairview No. 1, Reedsport-Fairview No. 1, Tahkenitch Capacitor Tie No. 1, Tahkenitch-Gardiner No. 1, Tahkenitch-Reedsport No. 1, Wendson Substation Tie No. 1, Wendson-Tahkenitch No. 1 & 2, Bertelsen-Willow Creek No. 1, Eugene-Bertelsen No. 1, Eugene-Lane No. 1, Eugene-West 11th Lec., Hawkins-Alvey No. 1, and Willow Creek-Hawkins No. 1 rights-of-way (ROW) in Coos, Douglas, Lane, and Linn counties, Oregon. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the ROW 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 would 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 30 feet and 260 feet wide and 235 line miles in length. The proposed activities would occur in localized areas within the

ROW including approximately 1,886 acres of herbicide treatment, 804 acres of mowing, 1,598 acres of localized selective hand cutting methods, 87 miles of access roads, and 510 structure sites of existing transmission line and access road ROWs would be initially treated in the fall 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. A follow-up treatment of re-sprouting target vegetation would be conducted by fall of 2027. 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 210 danger trees (DT) and 3,086 corridor trees (CT) in, or adjacent to, the ROW and to remove limbs or top from approximately 3,118 trees in, or adjacent to, the ROW. Tree clearing would not be concentrated and occur in multiple, discrete locations within the 235 miles of ROWs. 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.

/s/ *Julianna Martin*
Julianna Martin
Physical Scientist (Environmental)

Concur:

/s/ *Sarah T. Biegel*
Sarah T. Biegel
NEPA Compliance Officer Date: *October 23, 2026*

Attachment(s): Environmental Checklist

# 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:** Alvey District FY27 Vegetation Management

## Project Site Description

The Project Site is located in the Coastal Range and Willamette Valley ecoregions, defined by evergreen forests dominated by conifers, particularly Douglas-firs, oak savannah, grasslands, and river floodplains. The work areas are existing transmission line ROWs that are primarily in rural residential, agricultural, private residential and urban, USFS Siuslaw National Forest, BLM-managed land, and state lands. The existing transmission ROWs 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: BPA Cultural Resource Staff have determined that, pursuant to the *Nationwide Programmatic Agreement Among the Bonneville Power Administration, the Southwestern Power Administration, the Western Area Power Administration, the National Conference of State Historic Preservation Officers, and the Advisory Council on Historic Preservation Regarding Routine Transmission Operations and Maintenance Undertakings Associated with Existing Transmission Facilities and Access Roads Throughout the United States,* BPA's FY27 Vegetation Management Project: Eugene District would result in No historic properties affected as **Appendix G Conditions A.1, A.6, A.7 and A.8** are met.

Notes:

- Cultural requirements for vegetation management are noted in the cutsheets.

### 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 with Conditions

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 ROWs 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 are no listed state-sensitive species, or USFS- or BLM-sensitive species. A species list was obtained from the United States Fish and Wildlife Service (USFWS) for federally-listed, proposed, and candidate wildlife species potentially occurring within the project boundaries. Kincaid's lupine and Willamette daisy designated critical habitat occur within the project area and are noted in project cutsheets. 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.

Notes: Species Specific Mitigations

**Willamette daisy and Kincaid's lupine mitigations:**

- Schedule all planned maintenance activities to occur between August 15 and April 15 for spans that contain Willamette daisy or Kincaid's lupine.
- Herbicide use: Only spot and localized applications of herbicide would be used in spans that contain Willamette daisy or Kincaid's lupine.
- Herbicide applications would maintain a minimum distance of 1 m (3.3 feet) from listed plants, unless they are dormant (August 15 and December 15), in which case no buffer is required.
- For all herbicide applications, listed plants would be physically shielded (e.g., covered with buckets or some other barrier that would not harm the plants) as needed to protect them from spray or drift, unless they are dormant, in which case shielding is not necessary. Plants would be uncovered immediately after spraying has been completed. Conduct all herbicide spraying, including follow-up foliar treatments, between August 15 and December 15.
- Unless otherwise requested by landowners, debris (other than noxious weeds) would be disposed of onsite, using on-site chip, lop and scatter, or mulching techniques.
- Debris would not be piled or spread within 25 feet of Willamette daisy or Kincaid's lupine populations.
- Mower deck height would be at least 6 inches above the ground. If a skid-steer with mowing deck is used, sharp turns would be avoided.

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

Potential for Significance: No with Conditions

Explanation:

State Sensitive and/or Sensitive-Critical wildlife species have been observed in the vicinity of the project area and include: Oregon spotted frog. There are no listed USFS-sensitive species or BLM-sensitive species. 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 wildlife species potentially occurring within the project boundaries. 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.

Notes: Species Specific Mitigations

**Marbled murrelet:**

- Utilize dawn/dusk timing restrictions during the entire breeding period (April 1-Sept. 15)
- Individual tree removal (ITR) or side-limbing/pruning on trees with nesting structure, or immediately adjacent to
  a tree(s) with nesting structure would not occur during the entire breeding period.
  When side-limbing, avoid disturbing moss on non-target branches.

**Streak horned lark:**

- Between April 16 and August 15, inspection activities conducted in potentially suitable SHL habitat, where no access roads and routes of travel are available (e.g., off road), be done on foot, where practicable.
- For scheduled maintenance activities, no mowing or mechanized equipment would be used in the ROW, on existing access roads, and around structure sites; and any travel off established access roads and routes of travel would be done on foot between April 16 and August 15 in potentially suitable SHL habitat, unless pre-project surveys are conducted by a qualified Wildlife Biologist using survey methods approved by the Service to determine presence/absence of larks. If a nesting area is discovered, no activities would take place within 100 feet of the nest until chicks have fledged.
- If maintenance activities within 100 feet of an occupied SHL nest area must occur between April 16 and August 15 due to emergency reasons or outage constraints, the BPA Environmental Lead would contact a USFWS representative immediately to determine if the activity fits within the parameters of this opinion, including the manner and extent of effects already analyzed, or must instead be covered separately under emergency consultation.

**Fender's blue butterfly:**

- Schedule planned maintenance activities to occur prior to April 15 or after August 15 to avoid physical harm to the species during the sensitive larval and adult development stage.
- Minimize disturbance of FBB larval host plants: Kincaid's lupine, longspur lupine, or sickle-keeled lupine. These lupines grow across much of the ROW in FBB habitat locations.
- Minimize disturbance to nectar-producing food plants such as tapertip onion, narrowleaf onion, Tolmie's mariposa lily, common camas, Clearwater cryptantha, 31 Oregon sunshine, Oregon geranium, Oregon iris, pale flax, blue flax, meadow checker-mallow, rose checker-mallow, bird vetch, common vetch, and tiny vetch and others.
- If mowing is prescribed, a skid-steer with mowing deck would be used to perform the work in late summer/early fall (when soils are not saturated). Sharp turns would be avoided.
- Herbicide application would occur when target species are actively growing in the fall or spring (prior to April 15).
- Debris would be disposed of onsite, along the ROW (outside of occupied FBB habitat areas), using on-site chip, lop and scatter, or mulching techniques.
- Vehicle speeds on ROW access roads would be limited to 5 miles per hour.

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

Potential for Significance: No with Conditions

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 designated 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.

BPA conducted a review of ESA-listed anadromous fish species and Essential Fish Habitat (EFH) (as defined by the Magnuson-Stevens Act), under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS). BPA determined the proposed vegetation management activities are within the scope of activities and action area evaluated in the 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 (SLOPES PBO) (WCR-2014-1600, September 22, 2016). Streams in the project area with documented presence of ESA-listed fish, designated as critical habitat for one or more species, and/or identified as EFH have been noted in the vegetation control cut sheets. 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.

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. Bull trout and their designated critical habitat are not present in the project area and thus, the project would have no effect on bull trout or its designated critical habitat. There are no listed state-sensitive species, or USFS- or BLM-sensitive species.

Notes:

Waterway and Anadromous Fish Mitigations

- Within riparian or water resource buffer zones, only hand cutting and spot and localized herbicide applications with herbicides that have acute toxicities (to aquatic organisms) in the range of "practically non-toxic" to "slightly toxic" (e.g., triclopyr triethylamine (TEA) salt (Garlon 3A/Tahoe 3A) or triclopyr choline (Vastlan)) would be used in between the water resource's edge and 100 feet on either side of the resource (35 feet for water resources without ESA-listed species). Other BPA-approved herbicides may be used beyond the 100- or 35-foot buffer unless otherwise indicated by species-specific conservation measures.
- Trees in riparian zones will be selectively cut to include only those that are within 50 feet of the conductor at maximum sag or are identified as corridor trees or danger trees. Other riparian vegetation, (e.g., willows) would be left in place, where possible, to preserve shade conditions and wildlife habitat.
- Potentially-ground-disturbing mechanical activity would be restricted in water resource buffer zones adjacent to streams, lakes, ponds, wetlands, and other identified sensitive habitats based on percent slope. For slopes over 20%, no ground-disturbing mechanical equipment would be used within 35 feet of the water resource.

## 6. Wetlands

Potential for Significance: No with Conditions

Explanation: Wetlands may be present in the treatment areas and are noted in project cutsheets. 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.

Notes:

- See mitigations above for Water Bodies, Floodplains, and Fish.

## 7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No use of groundwater is proposed. 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. No disruption to the use of state, Federal, or privately-managed lands would occur.

Notes:

- Delete if not needed

## 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 the BLM and USFS – Siuslaw National Forest. No special measures or requirements were identified for treatments on BLM- or USFS-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/ *Julianna Martin*
Julianna Martin Date: *October 23, 2026*
Physical Scientist (Environmental)