U.S. Department of Energy
Categorical Exclusion Determination Form

Proposed Action Title: Sitewide Vegetation Management for Safety and Wildfire Prevention
Lawrence Berkeley National Laboratory (**LB-CX-24-05**)

Program or Field Office: DOE Berkeley Site Office

Location(s) (City/County/State): Berkeley, California

Proposed Action Description: The U.S. Department of Energy (DOE) proposes to continue on-going and future vegetation management activities aimed at reducing risk of, and potential damage from, wildland fire on the Lawrence Berkeley National Laboratory (LBNL, or Berkeley Lab) campus. Vegetation management would also continue to address other potential life safety and property damage risks.

The LBNL campus is a ~202-acre site at the urban-wildland interface of the lower East Bay Hills in Alameda County, California. (See Figure 1) Approximately two-thirds of the site is undeveloped grassland, woodland, and other naturally vegetated areas along its steep slopes and challenging terrain. The campus is subject to long, dry summers, periodic severe drought, and occasional warm winds from inland California that can create severe fire conditions. In fact, the Forest Resource Assessment Program of the California Department of Forestry and Fire Protection (CAL FIRE) has designated the LBNL site as part of a Very High Fire Hazard Severity Zone.

DOE invests in comprehensive fire protection and prevention at Berkeley Lab. A fully-equipped on-site fire station is staffed around the clock and is overseen by the Lab's Security and Emergency Services (SES) division. Three 200,000-gallon water tanks provide the campus with pressurized water for fire suppression. Pertinent to this proposed action, LBNL undertakes continuous monitoring and management of vegetation around the site as part of its on-going vegetation management program. This includes seasonal removal of potentially hazardous leaf litter, understory, ladder fuels, and hazardous trees, as well as use of mechanical methods and grazing (i.e., contracting with goat herders) to remove dried grasses and invasive brush.

Vegetation management at the Lab is conducted by qualified Facilities Division groundskeeping professionals and outside contractors, including certified arborists. Vegetation management work is planned and coordinated under the oversight of the Lab's Facilities, Environmental Health & Safety, and SES Divisions, along with environmental planning staff, wildlife biologists, and other experts and stakeholders. Care is taken to consider worker and public safety, sensitive biological resources, and environmental restoration in the Lab's practice of vegetation management.

Under the proposed action, LBNL would continue on-going vegetation management activities, including: 1) continue to maintain equipment and personnel that provide vegetation management services; 2) continue year-round assessments for potentially hazardous foliage and trees; 3) continue to seasonally manage grasses and invasive brush, primarily by use of mechanical methods (hand-held tools) and grazers; 4) continue to address hazardous fuel conditions by removing leaf litter, understory, and ladder fuels; 5) continue to prune, limb-up, thin, and/or remove potentially hazardous trees, including dead, dying, and diseased trees, or trees that may cause substantial fire hazard. This would include removing trees positioned to fall across the Lab's main entry roads during a fire and trap evacuees while preventing access to emergency vehicles. This would also include trees that are too close to buildings to meet fire codes or that overhang building rooftops; 6) continue to prune or remove potentially hazardous trees that are precariously positioned to fall, that may be damaging subsurface infrastructure, or that may be dropping flammable leaf litter onto roofs or into sensitive equipment; 7) continue to address resprouting of invasive trees and plants by revisiting and maintaining tree stumps and managed areas; 8) continue to undertake minor restoration of managed areas, such as through reseeding, application of temporary erosion control measures, and transplanting of desirable plant and tree species where vegetation was removed.

Under the proposed action, Berkeley Lab would continue to follow all applicable environmental laws; LBNL safety and operating rules, regulations, policies, and best management practices; and DOE orders and procedures that are protective of the general public, the environment, and vegetation management personnel. This include Berkeley Lab's Standard Project Features (identified through LBNL's NEPA Compliance Program) that articulate mandatory practices undertaken during vegetation management that are protective of surface waters and biological resources, such as Alameda whipsnake, breeding birds and bats, and riparian areas. Work would continue to be overseen by LBNL's Facilities, EH&S, SES, and Campus Planning experts and would adhere to recommendations provided in Berkeley Lab's Vegetation Management Guide (updated 2024).

Work would continue to take place year-round, with special emphasis on treating grasses and brush during early-to-mid summer and hazardous trees during early fall, after the end of the bird and bat breeding seasons. As with current practice, vegetation management would also be expected to step up in the aftermath of winter rainstorms when trees and branches fall or are put in a precarious position to topple. Work may continue to occur in cooperation with LBNL campus neighbors, including UC Berkeley, such as when trees have fallen across property lines. The activities encompassed under this proposed action would be re-reviewed pertinent to NEPA in approximately five years and thereafter on a five-year basis.

Categorical Exclusion(s) Applied:

B1.3 Routine maintenance

B1.20 Protection of cultural resources, fish and wildlife habitat

B1.33 Stormwater runoff control

B3.1 Site characterization and environmental monitoring

For the complete DOE National Environmental Policy Act regulations regarding categorical exclusions, including the full text of each categorical exclusion, see Subpart D of 10 CFR Part 1021.

Regulatory Requirements in 10 CFR 1021.410(b): (See full text in regulation)

☒ The proposal fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D.

To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) 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; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) 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 listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.

☒ There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.

☒ The proposal has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR1021.211 concerning limitations on actions during preparation of an environmental impact statement.

I concur that the above description accurately describes the proposed action.

LBNL Site & Environmental Planner: _____ Jeff Philliber — Date Determined: 09-12-24

BASO NEPA Program Manager: Jose Roldan Digitally signed by Jose Roldan Date: 2024.09.18 06:02:46 -07'00' — Jose Roldan — Date Determined:

BASO MIP Division Director: MARY GROSS Digitally signed by MARY GROSS Date: 2024.09.18 07:22:37 -07'00' — Mary Gross — Date Determined:

Based on my review of the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1 B), I have determined that the proposed action fits within the specified class(es) of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

NEPA Compliance Officer: PETER SIEBACH Digitally signed by PETER SIEBACH Date: 2024.09.27 14:51:10 -05'00' **Date Determined:** Click here to enter a date.

Figure 1: LBNL Campus