

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Tualatin SWCD Invasive Plant Management

Project No.: LURR-2019021

Project Manager: James Clark – TERR-Chemawa

Location: Washington County, Oregon

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.3 Routine Maintenance

Description of the Proposed Action: Bonneville Power Administration (BPA) is proposing to allow Tualatin Soil and Water Conservation District (Tualatin SWCD) to survey for and treat – if found – invasive plants on BPA fee-owned right-of-way (ROW) in Washington County, Oregon. The proposed project would encompass two sites along the Keeler-Oregon City No. 2 transmission line: one site around Summer Creek between structures 14/4 and 14/10 and the other site around Bronson Creek between structures 6/8 and 6/10. The effort would target five species of invasive plant: garlic mustard (*Alliaria petiolata*), woody knotweed (*Polygonum spp.*), giant hogweed (*Heracleum mantegazzianum*), spurge laurel (*Daphne laureola*), and purple loosestrife (*Lythrum salicaria*). Depending on the species, targeted plants would be treated with herbicides, either aquatic glyphosate, aquatic triclopyr-TEA, or aquatic imazapyr. In all cases, herbicide would be applied along with a surfactant to maximize absorption through the leaf surface. At most, herbicide would be applied four times per year: twice in the spring (late March to early June), once in mid-summer (August or September), and once in late summer or early fall (September or October). In some cases, plants could be hand-pulled or dug up in sensitive areas to avoid harming nearby native plant species, fish and wildlife, aquatic resources, and/or human health and safety.

Findings: In accordance with Section 1021.410(b) 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), BPA has determined that the proposed action:

- (1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
- (2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
- (3) has not been segmented to meet the definition of a categorical exclusion.

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ W. Walker Stinnette

W. Walker Stinnette

Contract Environmental Protection Specialist

Portland State University – Hatfield Resident Fellow

Reviewed by:

/s/ Douglas F. Corkran

Douglas F. Corkran

Supervisory Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel

NEPA Compliance Officer

Date: May 7, 2019

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.

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Project Site Description

The project would encompass two individual sites on 100-foot wide BPA fee-owned transmission line ROW in Washington County, Oregon. The Summer Creek site is located on the Keeler-Oregon City No. 2 line between towers 14/4 and 14/10, and the Bronson Creek site is located on the same transmission line between towers 6/8 and 6/10. At both sites, the ROW is maintained clear from tall vegetation and currently hosts a mix of native and non-native herbaceous and shrub species. The headwaters of Summer Creek as well as a separate unnamed tributary run through the Summer Creek site. Although there are no mapped wetlands in or near the Summer Creek site, the site does contain hydric soils, and its proximity to streams suggests there could be wetlands present on-site. Nearly the entire Bronson Creek site contains mapped wetlands and ponded water associated with Bronson Creek, which also runs through the site. A paved recreational path is located within the ROW for the entire length of the Summer Creek site. Similarly, at the Bronson Creek site, there is a dirt recreational path leading to a raised boardwalk within the wetlands. Outside of the ROW, the surrounding land use is primarily urban residential and commercial development.

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. Historic and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> The BPA archaeologist completed a desktop review of the proposed project and determined that the actions would have No Potential to Affect historic properties. The project sites would be accessed on foot, and minor ground disturbance would be limited to hand-pulling and manually shoveling up small invasive weeds only in areas where herbicide use is not appropriate. Contact the EC environmental lead should machinery be required to remove larger invasive shrubs, as this might change the determination. Should any cultural resources be discovered during project activities, then all project work must stop, and the EC environmental lead should be notified immediately. No additional review under Section 106 of the National Historic Preservation Act (36 CFR 800.3 (a)(1)) is required for this proposed action at this time.</p>		
2. Geology and Soils	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> Geology and soils within and around the project sites were previously disturbed during the installation of the transmission towers and recreational paths. The sites would be accessed on foot, and minor ground disturbance would be limited to areas where herbicide use is inappropriate and invasive species must be hand-pulled or dug up. These soil-disturbing activities are not expected to result in substantial erosion and/or sedimentation.</p>		

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



Explanation: Removal of invasive plants would result in temporary loss of vegetative cover. Although the project would target invasive species, there may be incidental take of native plants. To limit the amount of incidental herbicide drift to native plants, herbicide would be applied directly onto small patches or individual plants by spot spraying with a low volume and low pressure backpack sprayer. Spraying would only be carried out when wind speeds are less than 10 miles per hour, while being mindful of wind directions. Hand-pulling or digging up an invasive plant should be considered in instances where native species are in close proximity, and there is significant risk of exposure to herbicide. To prevent the spread of invasive species, manually removed plants should not be allowed to enter waterways; rather, plants should be bagged and disposed of off-site. Boots, clothing, and equipment would be required to be cleaned before entering a new project site.

There are no documented occurrences of any state special-status plant species or plant species protected under the Federal Endangered Species Act (ESA). Therefore, the project would have no effect on protected plant species.

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



Explanation: Minor disruption of normal wildlife behavior in and around the project sites could occur from temporary human presence. To minimize impacts to wildlife, herbicide should not be applied in areas where there is evidence of wildlife activity (e.g. game trails, burrows, and nesting sites). Herbicide application should be carried out early in the morning before pollinators are actively searching for flowering plants. Flowering bodies should be removed from invasive plants to avoid attracting pollinators to plants treated with herbicide.

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



Explanation: The Oregon Department of Fish and Wildlife has identified both Summer Creek and Bronson Creek as suitable habitat for Pacific lamprey (*Entosphenus tridentatus*), which is listed as a Species of Concern under the ESA and is recognized as a sensitive species by the State of Oregon. Pacific lamprey have been documented downstream of both sites in the Tualatin River.

Only herbicides and surfactants that have been approved for use around water would be used. Aquatic imazapyr and aquatic triclopyr-TEA should not be applied using the spot spraying method within 15 feet of standing or flowing water; although both herbicides may be applied up to the waterline using hand selective techniques (e.g. wicking and wiping, basal bark, "hack and squirt", stem injection, or cut-stump). Herbicide should not be applied to individual plants that are in standing or flowing water (e.g. purple loosestrife); rather, these plants should be removed manually. To minimize the amount of herbicide that could migrate into streams or wetlands, herbicide would not be applied within 48 hours before or after a precipitation event.

6. **Wetlands**



Explanation: To minimize contact with water, herbicides and surfactants would be applied only when water levels are low. Scattered patches of aquatic invasive species (e.g. purple loosestrife) should be hand-pulled or dug up to further minimize impacts to wetlands. The project would involve limited soil disturbance, and the sites would be accessed on foot. Therefore, the project would have no significant impact on nearby wetlands.

7. **Groundwater and Aquifers**



Explanation: Herbicides and surfactants approved for use in and near water would be used, and soil disturbance would not reach depths that could affect groundwater or aquifers. Therefore, the project would have no significant impact to groundwater or aquifers.

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



Explanation: Both project sites contain recreational trails, and the Bronson Creek site is immediately adjacent to Hansen Ridge Park. However, there would be no change to land use at the project sites and no impact to specially-designated areas in the project vicinities.

9. **Visual Quality**



Explanation: Removing invasive species would not significantly change the visual quality of the project sites.

10. **Air Quality**



Explanation: There would be no significant change in air quality in and around the project site during or after completion of the project.

11. **Noise**



Explanation: There would be no significant change in noise in and around the project site during or after completion of the project.

12. **Human Health and Safety**



Explanation: Signage indicating that herbicide is in use would be posted to each of the project sites' access points. A non-hazardous indicator dye would be mixed in with the herbicide to visually indicate which areas have been treated. Herbicide would not be used in areas adjacent to recreational paths and other areas of known human use; rather, invasive species would be manually removed from these areas. No impacts to human health or safety are expected as a result of project activities.

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, if necessary:

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- 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, if necessary:

- 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, if necessary:

Landowner Notification, Involvement, or Coordination

Description: The ROW is BPA fee-owned. Adjacent landowners and ROW easement lessees would be notified of the upcoming project by BPA. Additionally, the Land Use Agreement would direct Tualatin SWCD to coordinate with landowners.

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

Signed: /s/ W. Walker Stinnette
W. Walker Stinnette – EC-4
Contract Environmental Protection Specialist
Portland State University – Hatfield Resident Fellow

Date: May 7, 2019