

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** 2021 Willamette Valley Wildlife Management Area Operations and Maintenance

**Project No.:** 2011-004-00

**Project Manager:** Hannah Dondy-Kaplan, EWM-4

**Location:** Clackamas, Polk, Lane, Benton, Multnomah, and Columbia counties, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.20 Protection of cultural resources, fish and wildlife habitat; B1.3 Routine maintenance

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to fund Oregon Department of Fish and Wildlife (ODFW) to carry out ongoing operations and maintenance (O&M) of lands purchased by BPA or with BPA funding via fee title or conservation easement. Funding for this work partially fulfills commitments made by BPA in the 2010 “Willamette River Basin Memorandum of Agreement Regarding Wildlife Habitat Protection and Enhancement between the State of Oregon and the Bonneville Power Administration”. This is part of ongoing efforts to mitigate for the impacts to fish and wildlife from the construction and operation of Federal flood control and hydroelectric facilities in the Willamette River Basin. This categorical exclusion is an update to the November 9, 2020 version to address added actions occurring in 2021 related to vegetation management, debris removal, and plant and animal surveys.

The Willamette Wildlife Mitigation Program (WWMP) is part of ODFW and oversees O&M and restoration activities on seven sites in the Willamette valley:

- Coyote Creek South (CCS);
- Coyote Creek Northeast (CCNE);
- Flight’s End (FE);
- Gail Achterman Wildlife Area (GAWA);
- Herbert Farm and Natural Area (HFNA);
- Palensky Wildlife Area (PWA); and
- Sorenson Meadows (SOR).

Activities would assist in informing future site restoration actions, developing management plans, measuring the success rate of ongoing projects, determining the presence and distribution of species, and providing safe and reliable site access. Additionally, small-scale restoration actions

or placement of structures that mimic natural features and provide support for wildlife foraging, breeding, and/or nesting/refuge may occur (for example, attaching duck boxes to trees or posts during the nesting season). Proposed actions are as follows:

### **Water Control Structure Maintenance and Evaluation (FE)**

A preexisting structure that controls the flow of water to a channel surrounding the entire FE site would be maintained and evaluated. The water control structure is approximately 10 feet wide by 80 feet long and consists of a vertical three-sided grate surrounding a sliding door controlled by a manual screw. Data collected would include water depth and plant species response to water management. The land manager and technicians would inspect the structure several times per year to make sure it is free of debris. Vegetation around the structure would be controlled by mowing or hand tools to prevent overgrowth. The structure remains open year-round, but the hardware (wheel) for closing the structure remains on site and would be tested periodically.

### **Plant and Animal Surveys (CCS, CCNE, GAWA, HFNA)**

Presence/absence surveys and point-intercept monitoring could be conducted opportunistically to determine the presence and location of plant and animal species, with specific emphasis on Oregon Conservation Strategy (OCS) species (details available at [www.oregonconservationstrategy.org](http://www.oregonconservationstrategy.org)).

### **Vegetation Management (all sites)**

Vegetation would be managed at the various sites, including:

CCS and CCNE – Treatment methods would include spot spraying broadleaf weeds and reed canary grass (*Phalaris arundinacea*); boom spraying non-native grass and reed canary grass; mowing grass sections (perimeter and berms), woody vegetation, and reed canary grass; mechanical removal and grinding brush with a skid steer attachment; cutting ash saplings; vegetation planting; and broadcasting seeding, with the goal of maintaining oak (*Quercus*) forest and riparian areas to keep them free of weed and ash (*Fraxinus*) incursion. Sites would be accessed using existing roads and trails.

FE – Up to 25 acres of riparian forest habitat would be treated using hand and mechanical removal, disking, mowing, and herbicide application via backpack spraying where appropriate. Target species would include reed canary grass, Himalayan blackberry (*Rubus armeniacus*), English hawthorne (*Crataegus laevigata*), and birdsfoot trefoil (*Lotus corniculatus*). Native seeds such as rushes (*Juncaceae*) and sedges (*Cyperaceae*) would be planted in over 20 acres of upland habitat.

GAWA – Herbicide and mechanical plant removal would target Himalayan blackberry and English ivy (*Hedera helix*), with the goal of allowing the native understory, such as snowberry (*Symphoricarpos*), to grow and out-compete the non-native vegetation. Native shrubs and plugs may be planted in the spring and fall. Vegetation management would generally occur on approximately 85 acres of the 290-acre property, though spot treatments could potentially occur elsewhere on the property if invasive species were noted outside of the planned treatment areas.

HFNA – The 221-acre property is divided into Phase I (84 acres, west of Mat Creek) and Phase II (137 acres, east of Mat Creek). Phase I activities would include spot spraying, mowing, and seeding with native seed mixes. Phase II activities would involve more active restoration with broadcast herbicide treatments, spot spraying, mowing, hand weeding, seeding, and planting trees, shrubs, herbs, bulbs and bare root plants. Existing native vegetation would be maintained and encouraged by treating non-native and invasive plant species using hand and mechanical

removal, disking, mowing, and herbicide application. Sites would be accessed using existing roads and trails.

PWA – Approximately 35 acres would be treated using mechanical methods (hand tools, chainsaw, mowing), physical removal (pulling) and chemical removal (spot spraying). Target species include English ivy, Japanese knotweed (*Reynoutria japonica*), and reed canary grass.

SOR –Vegetation management would occur on up to about 46 acres (inclusive of the entire property). Target species include blackberry and ivy. The following activities would occur: planting bulbs, seeds, and plugs in the meadow and understory; broad-scale planting within the canopy; spot planting of select species to improve species diversity; grubbing or digging the roots of persistent invasive vegetation; pruning or limbing trees; removing trees to suppress infestations of pine bark beetle (*Hylastes ater*); prescribed burning of plant debris (“slash piles”); and spot flaming to suppress patches of invasive vegetation. Slash pile burning would take place between mid-fall and winter on approximately 0.1 acre of forest habitat (defined as greater than 100 trees per acre) and 0.1 acre of woodland habitat (defined as 7 to 20 trees per acre). Spot flaming would be carried out via handheld torch burning invasive weeds to the taproot, and would take place between mid-fall and early spring. Approximately 5 to 10 acres of forest, one acre of woodland, and one acre of meadow-savanna would be treated. Patrol routes and fire breaks would be mowed.

### **Fence Wire Removal (CCNE)**

An existing 2.5-mile fence at the CCNE property currently presents a hazard to wildlife due to the height of the wire lines running between fence posts. These lines would be cut and removed in order to prevent wildlife injury. This would not involve ground disturbance or removal of the posts.

### **Road Maintenance (FE, PWA)**

Roads and signs would be maintained as follows: twice annually, a compact tractor with a rotary mower attachment would pass over the access roads in order to keep them free from tall grass and prevent woody vegetation from becoming established on the road. The roads would not be graded or extended beyond the road prism, which is defined as the road bed and the side/cut slopes. Potholes would be driven around rather than filled. Downed trees that had fallen on the road would be removed using chainsaws and a small compact tractor. Both roads have locked, metal gates with signage that would be replaced as needed. This would not require ground disturbance, as the signs are posted on the gates. No public access is allowed on these sites.

### **Debris Removal (GAWA, PWA)**

Garbage and/or debris deposited by annual flooding and visitors would be removed by hand, usually during routine maintenance work or during site visits, then hauled away by hand and placed in a dumpster.

### **Field Data Collection and Habitat Condition Monitoring (all sites)**

Vegetation, habitat, and species presence and absence surveys would be conducted at all sites to document baseline conditions, monitor treatment response, and identify invasive plant locations. Visual observations and photopoints would be used to map conditions and inform future management of these areas.

## Chub and Native Fish Surveys (all sites)

Project sites would be surveyed to establish and maintain Oregon chub (*Oregonichthys crameri*) and other native fish populations as agreed upon in the MOA. Sampling locations would be off channel habitats in the Middle Fork, McKenzie, and Santiam subbasins and tributaries to the mainstem Willamette River. Sampling would primarily be carried out using baited cylindrical minnow traps (46 centimeters (cm) long by 23 cm in diameter) composed of wire mesh deployed for 3 to 18 hours. In addition, seines (1meter (m) by 5m; 6.4 millimeter (mm) mesh), dip nets (6.4 mm mesh), hoop nets (four 61-cm-diameter, 1.3 cm mesh), and boat electrofishing could occur.

Sampling methods would consist of identifying and counting all fish captured at each site. The total length of a subsample (n=50) of Oregon chub would be recorded and the presence and life stages of amphibian and reptile species encountered would be recorded, as well as habitat components. All listed salmonids encountered would be enumerated and released unharmed near the location of capture.

**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/ Thomas DeLorenzo

Thomas DeLorenzo

Environmental Protection Specialist

Concur:

/s/ Katey C. Grange

July 13, 2021

Katey C. Grange

Date

NEPA Compliance Officer

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:** Willamette Valley Wildlife Management Area Operations and Maintenance (2021 Update)

### Project Site Description

The Willamette Valley is a 150-mile-long valley in central Oregon. It is surrounded by mountains on three sides – the Cascade Range to the east, the Oregon Coast Range to the west, and the Calapooya Mountains to the south. The Willamette River flows through the entire length of the valley.

Historically, the Willamette Valley forests were mostly comprised of an oak savanna, tall grasslands with scattered Garry oaks (*Quercus garryana*), and groves of coast Douglas-fir (*Pseudotsuga menziesii*). The river floodplains contained extensive wetlands, stands of willow (*Salix*), alder (*Alnus*), and cottonwood (*Populus*), and gallery forests.

Since the 19th century, much of the valley has been converted to support agriculture, which has caused much of the former grassland and savanna to revert to closed-canopy forest. Less than one-tenth of one percent of the original savanna vegetation remains. The Willamette Valley ecoregion contains fluvial terraces and floodplains of the Willamette River system, scattered hills, buttes, and adjacent foothills. It is distinguished from the neighboring Coast Range, Cascades, and Klamath Mountains ecoregions by lower precipitation, lower elevation, less relief, and a different mosaic of vegetation. Mean annual rainfall is 37 to 60 inches, and summers are generally dry.

Table 1: Land ownership and easement holder for each site.

Site	Owner	Easement Holder
Coyote Creek South (CCS)	ODFW	ODFW
Coyote Creek Northeast (CCNE)	ODFW	ODFW
Flight's End (FE)	ODFW	ODFW
Gail Achterman Wildlife Area (GAWA)	ODFW	ODFW
Herbert Farm and Natural Area (HFNA)	City of Corvallis	ODFW
Palensky Wildlife Area (PWA)	BPA	BPA
Sorenson Meadows (SOR)	BPA	BPA

## **Evaluation of Potential Impacts to Environmental Resources**

### **1. Historic and Cultural Resources**

Potential for Significance: No with Conditions

Explanation: National Historic Preservation Act Section 106 consultation was completed under BPA CR Project numbers OR 2015 032, OR 2015 050, OR 2017 082, OR 2018 109, and OR 2020 072 for vegetation management, fence wire removal, water control structure maintenance, and debris removal. Consulting parties included the Oregon State Historic Preservation Office, the Confederated Tribes of Grand Ronde, and the Confederated Tribes of the Siletz. BPA determined that the implementation of the proposed undertakings would result in no historic properties affected (§36 CFR 800.4[d][1]). Consulting parties concurred with the effects determinations. The remaining actions have no potential to affect historic properties.

Notes:

- The following avoidance measures would be followed:
  1. Vegetation removal at CCNE: Mowing would only occur when the ground is dry.
  2. Vegetation removal at SOR: Site 35LA1186, which was identified during a property survey in 1998 and delineated in 2018, would be avoided using a 30-foot buffer.

### **2. Geology and Soils**

Potential for Significance: No

Explanation: Ground-disturbing activities would be limited to vegetation removal, hand seeding, and planting. Soil impacts would be minimal.

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

Potential for Significance: No with Conditions

Explanation: Endangered Species Act (ESA)-listed Bradshaw's lomatium (*Lomatium bradshawii*) is present at CCS, and CCNE. ESA-listed Kincaid's lupine and Nelson's checkermallow (*Sidalcea nelsoniana*) are present at HFNA. There would be long-term positive impacts by way of removing invasive species and encouraging native plant species growth. There could be short-term negative impacts to native plant species (both listed and non-listed) during proposed invasive species control and fence wire removal (which may have potential for plant species to be trampled). These impacts have been considered in BPA's ESA Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) for BPA's Habitat Improvement Program (HIP).

In accordance with the terms of the USFWS biological opinion, within the Willamette Valley, if a known site containing any of five ESA-listed plant species unique to the Willamette Valley (Bradshaw's lomatium, golden paintbrush, Kincaid's lupine, Nelson's checkermallow, and Willamette daisy) is within 0.25 miles of the project action area, or suitable or potential habitat may be affected by project activities, then a site visit/vegetation survey would be performed to determine whether ESA-listed plants are within the project area and whether individual listed plants or potential habitat may be adversely affected by project activities. Surveys have been completed at CCS, CCNE, and HFNA, and the locations of listed plant species have been documented.

Notes:

- ODFW would adhere to all activity-specific conservation measures identified in BPA's ESA Section 7 consultation with the USFWS and NMFS for BPA's HIP (HIP Project Notification No. 2021001-2021006). Clearly marked buffers would be established to avoid or minimize effects to listed plants.

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

Potential for Significance: No with Conditions

Explanation: ESA-listed streaked-horned lark (*Eremophila alpestris strigata*) is present at CCS, CCNE, and HFNA. ESA-listed Columbian white-tailed deer (*Odocoileus virginianus leucurus*) is present at PWA and FE. There would be long-term positive impacts to wildlife (both listed and non-listed) due to removal of hazardous fence wires. Any negative impacts to wildlife species as a result of the proposed action would be limited to the immediate area where there would be a temporary, small decrease in available habitat, temporary decrease in air quality, and temporary elevation in noise disturbance. These impacts have been considered in BPA's HIP consultation (please see Notes).

Notes:

- A qualified biologist with experience in pertinent species would determine whether streaked-horned lark, critical habitat, or suitable habitat were present in the project area and may be adversely affected by project activities. For projects that would occur during the nesting season (April 1 to August 31) within the range of the streaked-horned lark, pre-project surveys would be conducted using survey methods approved by the USFWS to determine presence/absence of larks in suitable habitat. Information acquired through these surveys would be used to direct restoration activities away from likely nesting areas and/or stagger treatments to allow for nests to be incubated, hatched, and fledged on known occupied sites, and limit herbicide treatments.
- To avoid and minimize impacts to Columbian white-tailed deer during the fawning period, ground-disturbing mechanical activity such as mowing, tilling, disking, grading, scalping or plowing, in addition to vegetation removal such as herbicide application or controlled burning would not occur from June 1 to July 15.
- ODFW would adhere to all activity-specific conservation measures identified in BPA's HIP consultation in areas where listed wildlife are present (HIP Project Notification No. 2021001-2021006).
- ODFW would follow BMPs established by the OCS to protect turtles during all activities where western painted turtles and western pond turtles (which ODFW has determined to be species of conservation concern) are known to be present. ODFW would adhere to the guidelines of the Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act during O&M activities.

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

Potential for Significance: No with Conditions

Explanation: ESA-listed steelhead (*Oncorhynchus mykiss*), Chinook salmon (*O. tshawytscha*), and coho salmon (*O. kisutch*) are present in the Willamette River, which flows adjacent to the FE, GAWA, HFNA, PWA and SOR properties. All O&M activities aside from fish surveys would occur on land and would not have the potential to affect fish species, with the exception of herbicide application. Impacts to aquatic species from herbicide use in riparian areas would be short-term and have been considered in BPA's HIP consultation (please see Notes).

Incidental take of salmonid species during chub and native fish surveys is covered under a NMFS Section 10 Scientific Research Permit (16290-3R, valid 6/1/16 - 12/31/20). BPA is listed as a funding agency on the permit application and is included in the intra-agency Section 7 consultation in the NMFS Biological Opinion, satisfying BPA's Section 7 requirements as a federal agency.

Incidental take of bull trout during chub and native fish surveys is permitted under an ODFW/USFWS Section 6 cooperative agreement that was established in 1986 and is

renewed annually. No bull trout have been caught over the life of the Section 6 agreement covering this work.

Sampling with boat electrofishing would occur during the Oregon in-water work window (July 1 – October 31).

Notes:

- ODFW would adhere to all activity-specific conservation measures identified in BPA's HIP consultation (HIP Project Notification No. 2021001-2021006) for vegetation management in river systems. This would include using only approved herbicides at application rates not to exceed the parameters specified in the HIP consultation and following herbicide mixing specifications and application methods.

## **6. Wetlands**

Potential for Significance: No

Explanation: The FE, GAWA, HFNA and PWA properties intersect wetlands. Removal, fill, or disturbance of native vegetation within wetland areas is not anticipated through ongoing O&M activities. Activities within or near wetlands would be limited to vegetation management and would have positive long-term effects.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: No new wells or use of groundwater is proposed.

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

Potential for Significance: No

Explanation: The underlying land use would not change as a result of this project.

## **9. Visual Quality**

Potential for Significance: No

Explanation: There would be no adverse effects to the visual quality of the environment as a result of this project.

## **10. Air Quality**

Potential for Significance: No

Explanation: Minor, temporary generation of emissions associated with increased vehicular traffic and smoke associated with spot flaming and slash burning would occur during project activities. There would be no substantial changes to air quality as a result of the proposed action.

## **11. Noise**

Potential for Significance: No

Explanation: The noise generated by project implementation would not substantially impact the surrounding environment.



## 12. Human Health and Safety

Potential for Significance: No

Explanation: All personnel would use best management practices to protect worker health and safety. Controlled burning would be carried out in accordance with the local regulations and safety measures.

### 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: All of the sites are either owned or managed by ODFW. No external coordination is needed to perform O&M at these sites.

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

Signed: /s/ Thomas DeLorenzo July 13, 2021  
Thomas DeLorenzo, ECF-4 Date  
Environmental Protection Specialist