

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Isqúultpe Watershed Area Operations and Management

**Project No.:** 1995-060-01

**Project Manager:** Andre L'Heureux, EWU-4

**Location:** Umatilla County, 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; B1.11 Fencing; B1.15 Support Buildings

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to fund the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) to conduct ongoing operations and management throughout 24,200 acres on the western slopes of the Blue Mountains in Oregon.

The CTUIR developed the Isqúultpe Watershed Project under the Columbia Basin Fish and Wildlife Program in 1995. The purpose of the project is to offset habitat losses from, and provide in-kind mitigation for, the impacts of construction and operation of the John Day and McNary hydroelectric projects.

The following major tasks are annual in nature and are necessary for ongoing operations and maintenance.

- **Vegetation Management:** Vegetation management actions would include the following control techniques: biological (introducing bio-agents that control weeds), chemical (approved herbicide by backpack sprayer or ATV mounted sprayer), cultural (burning and grazing) and mechanical (removal by hand, shovel, weed eater, tractor, tiler, hedge trimmer). The specific combination used would be tailored to the weed species, site, topography, and management goals.

Himalayan blackberry removal would occur throughout Isqúultpe Creek in Township 2N, R35E, Sections 11 and 14 and would be removed via mechanical means. Blackberry would be hand-pulled, cut with clippers, cut with a rotating blade attached to a tracked vehicle, or pulled and piled with an excavator.

Re-vegetation actions would occur by hand, shovel, or planting bar, and would consist of planting of seeds, seedlings, and/or cuttings of native grasses, forbs, and herbaceous and woody plants and trees

- **Road Maintenance and Parking Area Maintenance:** Road maintenance and improvement actions would occur annually to improve and repair road surfaces, and parking areas. Streamside shoulders and road surfaces would be regraded to facilitate

drainage, and new aggregate would be imported, placed, and compacted. Road and parking improvements would occur within depth and width of the original prism.

- **Fence Maintenance:** Annual maintenance, repairs and replacement of perimeter exclusionary fencing would occur from snow load, fallen trees, wild ungulate movement, and domestic livestock trespass. All elements of barbed wire and wood fence systems would be maintained and/or replaced in kind, including barbed wire strands, steel t-posts, wooden stays, rock jacks, crossbars, wood posts, cattle guards and gates, using hand tools and non-ground disturbing actions.
- **Forest Management:** Up to 100 acres of dry forest habitat would be thinned by hand (chainsaws) to reduce probability of catastrophic wildfire, disease and insect infestations. Tree thinning would involve trees approximately less than 9 inches in diameter to encourage mature forest overstory growth and to reduce density from the current 300+ trees /acre to about 50-70 trees /acre (approximately one tree left at 30 foot spacing interval). Understory debris pile burning would occur on the winter months or chipped and dispersed on-site.
- **General Maintenance:** Actions include the repair and maintenance of all buildings, equipment, and infrastructure. Actions also include the repair and maintenance of existing gates, parking areas, and public information sign boards. All proposed actions are those that are non-ground disturbing and retain the existing structure, with no modifications, additions, or removals of structures or structural elements that might affect its potential eligibility for inclusion in the National Register of Historic Places.

Any ground disturbance areas would be reseeded after disturbance with a native seed mix and native shrubs would occur with an ATV and/or broadcast by hand. Work would largely be conducted by workers traveling on foot or via existing access roads on the wildlife area. Work would be accomplished with hand tools and equipment with the exception of the road and trail maintenance, which may require excavators and dump trucks, depending on the level of repair.

**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/ Dan Gambetta

Dan Gambetta

Environmental Protection Specialist

Reviewed by:

Concur:

/s/ Katey C. Grange June 8, 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:** Isqúulktpe Creek Watershed Operation and Maintenance

## **Project Site Description**

The Isqúulktpe Creek watershed project area is a fifth-order subbasin located in the Umatilla River Basin, encompassing approximately 24,200 acres; containing approximately 958 acres of floodplain riparian habitat, 8,042 acres of grasslands, 4,898 acres of forest environments and 1,409 acres of upland shrub habitat in addition to 2 Bureau of Indian Affairs administered grazing allotments, containing approximately 11,500 acres.

The project area is located on the western slopes of the Blue Mountains in Oregon, contains Isqúulktpe (formerly known as Squaw) Creek which drains into the Umatilla River upstream of Pendleton, Oregon. Topography of the Isqúulktpe Watershed is typical of the Blue Mountain foothills, with broad flat ridges dissected by steep canyons.

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

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

Potential for Significance: No with conditions

**Explanation:** As the Isqúulktpe Creek wildlife area is located on trust lands owned and managed by the CTUIR, BPA initiated Section 106 consultation with the Tribal Historic Preservation Officer (THPO) of the CTUIR multiple times since 2006. In letters dated from September 2006, September 2013, August 2014 and September 2018 BPA determined the actions described herein would have no effect to historic properties. CTUIR THPO concurred with determination in letters dating September 2006, September 2013, August 2014, and September 2018.

Vegetative Management actions such as reseeding and hand-pulling, mowing, or applying herbicides for the control of invasive plants would have no potential to affect cultural resources.

The actions that require ground disturbance (tree thinning and blackberry removal) would take place within the previously surveyed APEs for which BPA conducted cultural resource surveys, consultations and determinations of no effect to historic properties.

All building and fence maintenance activities are non-ground disturbing and retain the existing structure, with no modifications, additions, or removals of structures or structural elements that might affect its potential eligibility for inclusion in the National Register of Historic Places.

#### **Notes:**

- In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and the concerned tribe's cultural staff and cultural committee and DAHP notified.

## 2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: Vegetative Management actions such as hand-pulling, mowing, or applying herbicides for the control of invasive plants would cause no or minimal disturbance to soils.

Forest management would involve minimal soil disturbance as tree removal would involve selective thinning, cut at the base rather than pushed over. Ground disturbance associated with slash and pile buildup are expected to be of limited in duration and short term.

Ground disturbance associated with fence management actions would be minimal to nonexistent as all work would be done by hand using materials on-site.

Ground disturbance associated with Blackberry removal sites would be short term as the ground would be revegetated with a native seed mix and planting native shrubs.

### Notes:

- Implement sediment and erosion control best management practices (BMPs) immediately after clearing and prior to initiating ground-disturbing activities to prevent erosion and runoff.
- Native seed mix, vegetation plugs, shrubs, and/or slash shall be placed on the disturbed soil to assist in the reestablishment of native vegetation.

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

Potential for Significance: No

Explanation: The only potential Federally Endangered Species Act (ESA)-listed special-status plant species in the Blue Mountains of SE Washington is the Ute ladies'-tresses. None of the activities are proposed in areas where they typically reside and they have never been documented or seen in the wildlife area, possibly as a result of historic over grazing. Therefore, operation and maintenance of the wildlife area would have no effect on Ute ladies'-tresses.

Vegetative management that utilizes herbicide applications shall utilize the Conservation Measures identified in BPA's Habitat Improvement Program (HIP) ESA consultation, which would result in minimal potential for drift or runoff to non-target vegetation.

Temporary, short-term impacts to vegetation from construction activities associated with road maintenance would be minimized by post-construction native revegetation efforts.

Plant disturbance associated with fence management actions would be minimal to nonexistent as all work would be done by hand using materials on-site.

Overall, vegetative management activities would result in minor beneficial impacts due to the reduction of invasive species and an increase in native vegetation.

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

Potential for Significance: No

Explanation: All human presence and activity associated with these actions would temporarily disturb and displace nearby wildlife, but long-term displacement resulting in competition for nearby habitats is unlikely. Vegetative management herbicide treatments would be small spot treatments of individuals or clusters of target plants that would be highly localized and thus not substantially impact any one animal's home range.

Road maintenance and forest management could cause temporary, short-term disturbance to and displacement of nearby wildlife, but long-term displacement resulting in competition for nearby habitats is unlikely. The operation of vehicles and equipment associated with these project actions are planned to take place after migratory birds have completed nesting and fledging.

The ESA-listed Canada lynx (*Lynx canadensis*) are known to occur in the Blue Mountains of SE Washington, Canada lynx (*Lynx canadensis*). While suitable habitat may exist in the Wildlife Area, no records show the presence of lynx with a negligible likelihood for presence in the future and the actions would have no effect on this species.

Overall the project would result in beneficial impacts to terrestrial wildlife due to the reduction of invasive species and the expansion and enhancement of native plant assemblages in floodplain riparian habitat, grasslands, forest and upland shrub.

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

Potential for Significance: No with Conditions

Explanation: Middle Columbia River steelhead and their designated critical habitat are within Iskuulpa Creek.

The fencing, road, trail and parking area maintenance actions would not disturb water bodies or floodplains.

Road and parking lot maintenance would not result in an overall increase in impervious surfaces that would result in additional discharge to water bodies and floodplains.

Herbicide applications would be conducted in accordance with conservation measures and methodologies to minimize potential for drift or runoff to water bodies and floodplains.

Fuel or fluid drips or spills from equipment and vehicles have the potential to occur during project activities, but are unlikely to do so in the volume necessary to contaminate water bodies.

Overall, habitat conditions for aquatic species are expected to improve in the long term from project actions as riparian areas are revegetated with native species.

#### Notes:

- Petroleum products, sediment, or other deleterious materials shall not be allowed to enter any stream, wetland, water body, or drainage conveyance.

- Spill containment and cleanup materials shall be readily available at project sites, staging areas, and in construction vehicles and equipment.

## **6. Wetlands**

Potential for Significance: No

Explanation: Removal, fill, or disturbance of wetlands and native vegetation within wetland areas is not anticipated from road and parking area maintenance, fence maintenance, general maintenance and forest management activities within project areas.

Vegetation Maintenance would involve removal of invasive weeds and non-natives using methods with little to no ground disturbance. Herbicide treatments are not planned to occur in or in the vicinity of wetlands.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: No new wells or withdrawal of groundwater is planned for the project areas.

Potential impacts to groundwater and aquifers from herbicide treatments would be minimized by application in accordance with HIP4 conservation measures.

Fuel or fluid drips or spills from equipment and vehicles have the potential to occur during project activities, but are unlikely to do so in the volume necessary to contaminate groundwater.

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

Potential for Significance: No

Explanation: There would be no changes to land use, and no impact to specially designated areas.

## **9. Visual Quality**

Potential for Significance: No

Explanation: No visually prominent vegetative, landform, or structural changes would be made.

The appearance of post-treatment vegetation removal sites may produce unsightly dead plants visible in the foreground in some areas for a season, but would not substantially alter the visual quality in the long term.

## **10. Air Quality**

Potential for Significance: No

Explanation: Temporary, short-term impacts from small amounts of dust and vehicle emissions would occur during project actions. Debris pile burning would introduce a short term source of particulates, but are expected to be temporary and not exceed air quality standards.

## **11. Noise**

Potential for Significance: No

Explanation: There would be some noise impacts for a few hours at each project site while the work is being done, but this type of noise is not inconsistent with that of common ranching, mining, or farming operations throughout the area.

Other noise sources would be from humans working on the site, and the use of vehicles to transport workers, supplies, and equipment to the project sites.

All noise sources are of low intensity and short-term.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: Vehicle operation and working with hand and power tools have their attendant risk to users, but there would be no condition created from these actions that would introduce new human health or safety hazards or risk into the environment.

No condition created by these actions would increase the burden on the local health, safety, and emergency-response infrastructure.

Neither project actions nor operation of project-associated vehicles on public roads would hinder traffic or access by emergency vehicles.

Project actions are not anticipated to create conditions, which would increase the burden on the local health, safety, and emergency-response infrastructure.

### **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: Project actions proposed by the CTUIR within the Isqúulktpe Watershed Area would be implemented by employees or contractors on lands owned and managed by the CTUIR.

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

Signed: /s/ Dan Gambetta June 8, 2021  
Dan Gambetta, ECF-4 Date  
Environmental Protection Specialist