

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Imagery for Pacific Lamprey Restoration Efforts

Project No.: 2017-005-00

Project Manager: Elizabeth Santana, EWM-4

Location: Multiple locations in Idaho, Oregon, and Washington

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B3.2 Aviation activities; B3.3 Research related to conservation of fish and wildlife

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to fund the Wild Fish Conservancy (WFC) project to prepare media materials for the Pacific Lamprey Conservation Initiative (PLCI) and partners related to the conservation of Pacific lamprey within the Columbia River Basin. Collected media would provide visual data to inform and enhance restoration and conservation strategies, and would be integrated into scientific publications, conservation planning documentation, and educational materials.

Funding supports BPA's commitments to the Columbia River Inter-Tribal Fish Commission, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs and Confederated Tribes and Bands of the Yakama Nation, in the Columbia River Fish Accord, as amended, while also supporting ongoing efforts to mitigate for effects of the Federal Columbia River Power System on fish and wildlife in the main stem Columbia River and its tributaries pursuant to the Pacific Northwest Electric Power Planning and Conservation Act of 1980 (Northwest Power Act) (16 U.S.C. (USC) 839 et seq.).

Media collection methods would be non-invasive, and would not require ground disturbance, vegetation removal, or handling wildlife. Each filming site would be visited for approximately one to two days. To access filming areas, passenger vehicles would remain on authorized roadways. Collection methods would include:

- **Ground Photography:** Ground photography would be conducted using handheld or tripod-mounted digital cameras, operated by personnel on foot.
- **Aerial Collection:** Aerial filming would be completed using the operation of small unmanned aerial systems (sUAS, also known as "drones"), which are electric-powered, typically under 55 pounds, and capable of vertical takeoff and landing without the need for dedicated runways or airport infrastructure. Drones would only be operated by licensed professionals and in compliance with Federal Aviation Administration (FAA) regulations under 14 CFR Part 107. Prior to each flight, pilots and operators would document pre-flight risk assessments to identify and set forth operational parameters, hazards, and controls. Drones would be hand-launched or launched from existing graveled or paved surfaces or

temporary pads. Drones would only be operated with authorization and following all requirements from the underlying landowner. Operation would only occur during daylight hours and for less than four hours each day.

- **Underwater Photography:** Underwater photography would be conducted by trained personnel equipped with snorkeling gear utilizing handheld waterproof camera equipment. Artificial lighting systems, such as strobe or continuous lighting, would only be used when natural light would not be sufficient. All preparation for in-water field work would be done on the stream bank, away from the shoreline.

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; 89 FR 34074, April 30, 2024), 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.¹

Daphne Day
Environmental Protection Specialist

Concur:

Katey C. Grange
NEPA Compliance Officer

Attachment(s): Environmental Checklist

¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*

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

Field sites may be in multiple counties in Idaho, Oregon, and Washington. Activities would occur in waterbodies and surrounding airspace and uplands.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: Activities would not result in ground disturbance that could potentially impact archaeological resources. No modifications to existing built historic resources are proposed. Therefore, the proposed actions would have no potential to cause effects to historic properties.

2. Geology and Soils

Potential for Significance: No

Explanation: No ground disturbance would occur as a result of the proposed actions. Therefore, the proposed actions would not impact geology and soils.

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

Potential for Significance: No

Explanation: The proposed actions would not require any tree or vegetation removal or management. Limited disturbance could occur from trampling of plants or habitats, if present. However, the proposed actions would be temporary and the net effect of these actions would be similar to those associated with routine events and processes that commonly occur in streams (e.g., large wildlife walking up to a stream). Therefore, the proposed actions would have no effect on special-status or other plant species or habitats that may be in project areas.

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

Potential for Significance: No with conditions

Explanation: Limited disturbance of normal wildlife behavior could occur from elevated noise and human presence from streamside presence and snorkeling at the various field sites. However, the proposed actions would be temporary (one to two days at each site) and the net effect of these actions would be similar to those associated with routine events and processes that commonly occur in streams (e.g., large wildlife walking up to a stream, human recreation). Wildlife species that could be present in the area would likely be habituated to this level of activity. Minor and temporary disruption of normal wildlife behavior could occur from drone operation, mainly during takeoff and landing. The majority

of each flight path would occur within airspace well above the tree line and away from wildlife habitat. There would be little to no risk of direct mortality from collision with a drone. Drone operations would be infrequent in a given area and short in duration and would not lead to permanent adverse modification of suitable wildlife habitat. The proposed actions would not result in adverse modification to suitable protected species habitat. Therefore, the proposed actions would have no effect on special-status or other wildlife species or habitats that may be in project areas when utilizing the minimization measures outlined below.

Notes:

- Drones would be launched and operated no closer than 100 meters from known or suspected wildlife populations.
- Drones would not be operated over or near wildlife and approaching wildlife from above would not be permitted, particularly during breeding, nesting, rearing, or other critical life history functions.
- Drones would not be operated within the disturbance limits of known or suspected populations of special-status wildlife species (e.g., ESA-listed, state-listed or state sensitive, migratory birds, bald and golden eagles) without implementing avoidance and minimization measures (e.g., daily and seasonal timing restrictions, disturbance buffers, and additional species-specific measures, as required). These avoidance and minimization measures would be included in pre-flight risk assessments, as necessary.
- In the unlikely event that the operation of drones inadvertently has an effect on wildlife species, BPA would require that the flight be immediately grounded until a BPA environmental lead can assess the effects in consultation with appropriate wildlife management agencies.

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

Potential for Significance: No with conditions

Explanation: Underwater media collection could disturb streambed sediment, which would temporarily increase turbidity in a limited area. Following completion of the proposed actions, suspended sediments would resettle on the streambed; turbidity would quickly return to pre-existing conditions. Fish in the area could also be temporarily disturbed, but similarly, following completion of the limited-duration proposed actions, they would return to normal activity. The net effect of these actions would be similar to those associated with routine events and processes that commonly occur in streams (e.g., large wildlife walking in a streambed, human recreation). No ground disturbance within floodplains would occur as a result of the proposed actions.

Therefore, the proposed actions would result in no long-term impact to water bodies and no impact to floodplains. The proposed actions would have no effect on special status fish species or habitats with the minimization measures outlined below.

Notes:

- Entry into the water would occur downstream of the area of interest whenever feasible, traveling as slowly as possible upstream and avoiding sudden movements.
- If any ESA-listed species are encountered, personnel would endeavor to increase their distance and minimize the duration of time in the vicinity to avoid disturbing the fish.
- All equipment would be hosed clean, decontaminated and dried before use and when moving between sites. Decontamination would be accomplished through approved hot water, freezing, or chemical methods.

6. Wetlands

Potential for Significance: No

Explanation: Some proposed activities (e.g., accessing streams on foot) could take place within or near wetlands. However, no ground disturbance would occur as a result of the proposed actions. Therefore, the proposed actions would not impact wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No ground disturbance would occur as a result of the proposed actions. Therefore, the proposed actions would not impact groundwater and aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The operation of drones could temporarily generate localized noise above typical ambient conditions, which could impact certain land uses (e.g., recreation, residential, etc.). However, the operation of drones would not restrict access to any area open to the public. Prior to operating a drone, specially-designated areas within the flightpath would be identified, and drone operators would comply with all associated guidelines and regulations for drone use, if required. There would be no permanent change in land use following completion of a flight.

9. Visual Quality

Potential for Significance: No

Explanation: Drones and drone operators could be temporarily visible to individuals near a flight path. However, drones are small relative to the skyline and landscape and would not be present in a given area for extended periods (less than four hours per day and approximately two days at each filming area). The proposed action would not result in long-term or permanent visual quality impacts.

10. Air Quality

Potential for Significance: No

Explanation: Minor and temporary dust and emissions could increase in the local area from vehicle and equipment use. Drones are battery-powered and do not directly generate emissions; although minor emissions could be indirectly associated with battery charging via the bulk electrical system. Depending on the launch surface, drone takeoff and landing could create a minor amount of dust. The proposed action would not result in permanent impacts to air quality.

11. Noise

Potential for Significance: No

Explanation: Minor and temporary noise could increase at field sites from vehicle and human presence, as well as equipment use, including the operation of drones, which could exceed ambient conditions at some locations for a short period (up to 4 hours per day for one to two days). The proposed activities would not result in long-term or permanent noise impacts. There would be no permanent change in ambient noise.

12. Human Health and Safety

Potential for Significance: No

Explanation: Personnel carrying out the proposed actions would be trained in proper techniques and equipment use, particularly associated with working in and around waterbodies. The project would not generate or use hazardous materials and would not create conditions that would increase risk to human health and safety. No impacts to human health and safety are expected as a result of the proposed actions.

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: The individual project sponsors would coordinate site access with public and private landowners and managers, which would include identification of any local airspace/flight restrictions and flight permissions from all applicable authorities prior to drone operation.

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

Signed:

Daphne Day
Environmental Protection Specialist