Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Adaptive Management of PALS on Couse and Tenmile Creeks

Project No.: 1994-018-05

Project Manager: Jenny Lord, EWU -4

Location: Asotin County, Washington

Categorical Exclusion Applied (10 C.F.R. Part 1021): B1.20 Protection of cultural resources, fish and wildlife habitat

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to fund the Asotin County Conservation District (ACCD) to modify Post-Assisted Log Structures (PALS) previously installed in Couse and Tenmile creeks[1] to fill gaps or extend effects observed from the previous year. Both creeks provide habitat for a variety of resident fish and Endangered Species Act (ESA)-listed steelhead (*Oncorhynchus mykiss*) and are designated critical habitat for steelhead.

Couse and Tenmile creeks have an oversupply of sediment, high stream temperatures, and limited geomorphic and hydraulic diversity due to a lack of structural elements. To address these limiting factors, ACCD installed 169 PALS in project area (PA) 79 of Couse Creek over four years, starting in 2020, and 147 PALS in PAs 65, 66, and 67 of Tenmile Creek over three years, starting in 2020. These structures were made of untreated wooden posts pounded into the stream bed and woven with small woody debris (slash material). Structures were designed to naturally accumulate debris, scour pools, redistribute sediment, and improve channel complexity during moderate to high flows. ACCD is proposing to modify the existing PALS to enhance features of some of the structures based on observed performance to support further reduction of stream velocities, lateral channel migration, ponding, aggradation of the incised stream bed, and growth of riparian and floodplain vegetation.

Modifications would include augmenting structures with additional posts or slash material. Not all structures would be modified each year. ACCD would target 10 to 20 structures to modify each year, over several years. Posts would be driven into the streambed with a hand-held hydraulic post driver. The number of posts added to a structure would not exceed 50 percent of the number of posts in the original structure. If necessary, posts may be removed from an existing structure if they are not functioning, to ensure continued fish passage, or if removal would encourage further action on one side of the stream.

Visual inspections of the structures and modifications would occur annually and after any major flood event. Ongoing operation and maintenance activities, including repairing damage,

[1] Initial installation of PALS was funded by BPA and analyzed in the *Couse Creek PALS Project* Categorical Exclusion and *Tenmile Creek RM 1.1 and 3.2 PALS Project* Categorical Exclusion, both dated July 13, 2021.

extending structure length by adding additional posts, or removing posts, may be needed in future years as streambank scour and flanking occurs and as the stream channel aggrades and widens, engaging with the floodplain. Additional structures, no more than 10 percent of the original number installed, may be added each year to the same stretch of the creek if needed to support system function to increase channel aggradation or increase local sediment supply. These would be installed in the same manner as described for augmentation.

Funding the proposed activities fulfills commitments under the 2020 National Marine Fisheries Service Columbia River System Biological Opinion (2020 NMFS CRS BiOp). These actions also support ongoing efforts to mitigate for effects of the FCRPS on fish and wildlife in the mainstem 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*.).

Findings: In accordance with Section 1021.102 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; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and *DOE National Environmental Policy Act (NEPA), Implementing Procedures* (dated June 30, 2025), BPA has determined the following:

1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.[2]

JACQUELYN SCHEI
Digitally signed by JACQUELYN SCHEI
Date: 2025.07.30 10:09:27 -07'00'

Jacquelyn Schei
Environmental Protection Specialist

Concur:

KATEY GRANGE
Digitally signed by KATEY GRANGE
Date: 2025.07.30 10:32:44 -07'00'

Katey C. Grange
NEPA Compliance Officer

Attachment(s): Environmental Checklist

---

[2] 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 the interim final rule to revise DOE NEPA regulations implementing NEPA at 10 C.F.R. Part 1021 and NEPA Implementing Procedures (dated June 30, 2025), 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.

Proposed Action: Adaptive Management of PALS on Couse and Tenmile Creeks

Project Site Description

The project site along Couse Creek is located between river miles (RM) 1.4 and 3.5, and approximately 4 miles south of the city of Asotin, Washington. The project site along Tenmile Creek is located between RMs 1.1 and 3.2, and approximately 10 miles south of Asotin. Both creeks are in the Lower Snake-Asotin subbasin, and terrain is similar in both project areas, consisting of steep valleys separated by flat-topped ridges. Land surrounding the project areas is privately owned and used for cattle operations. The project areas are surrounded by shrub-steppe grassland with a thin strip of riparian vegetation along the creeks. Riparian areas are either narrow or are dominated by upland plants due to lack of overbank flow and a low water table.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: Proposed modifications would not occur outside the area of potential effect analyzed in the prior consultation. For the Couse Creek project area, BPA determined that the implementation of the proposed project would result in no historic properties affected (WA 2020 055). The SHPO concurred with BPA's determination on June 17, 2020. The Nez Perce Tribe concurred with BPA's determination on July 7, 2020. No additional responses from consulting parties were received within 30 days. For the Tenmile Creek project area, BPA determined that the implementation of the proposed project would result in no historic properties affected (WA 2020 056). BPA notified consulting parties on July 5, 2020. The SHPO concurred with BPA's determination on July 7, 2020. No additional responses from consulting parties were received within 30 days.

2. Geology and Soils

Potential for Significance: No

Explanation: Minor and temporary ground disturbances would occur as part of the project. Posts may be driven into the streambed using a hand-held hydraulic post driver. No excavation would be required but posts driven into the streambed may result in small areas of sediment displacement and compaction. There may be localized flooding of soils in the riparian area because of the PALS, but this would align with the intended goals of the project to redirect flow laterally and redistribute sediment to increase channel and floodplain complexity.

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

Potential for Significance: No

Explanation: There are no federal or state special-status plant species known to exist in the project area. The USFWS Information for Planning and Conservation (IPaC) tool lists Spalding's catchfly (*Silene spaldingii*), ESA-listed as Threatened, as having the potential to be in project areas. However, there is no designated critical habitat in the project areas and

current land use practices have resulted in limited vegetation in general. There are no known occurrences of Spalding's catchfly in the project area and work would occur in streambeds, which is not habitat for the Spalding's catchfly. Therefore, there would be no impact to ESA-listed or state special-status plant species. Minor and temporary vegetation impacts would occur due to crews accessing the stream. In the long term, there would be beneficial effects from improving the channel complexity in the project area, which would lead to an increase in riparian plant communities.

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

Potential for Significance: No

Explanation: There are no federal or state special-status wildlife species or their habitats known to exist in the project area. IPaC tool lists the yellow-billed cuckoo (*Coccyzus americanus*), ESA-listed as Threatened, as having the potential to be in project areas; however, there is no critical habitat and no known occurrences of the species in the project area. Therefore, no ESA-listed or state special-status wildlife species would be affected by the project.

IPaC also shows the monarch butterfly (*Danaus plexippus*), ESA-proposed Threatened, and Suckley's cuckoo bumble bee (*Bombus suckleyi*), ESA-proposed Endangered, as having the potential to be present in project areas. Proposed critical habitat for the monarch butterfly does not overlap with the project area and there is no designated critical habitat for the bumble bee. Due to current grazing land use practices surrounding the project areas, nearby residences, and nearby county roads, it is unlikely these species would be present in project areas. Therefore, the proposed actions would have no impact to ESA-proposed wildlife species.

Proposed actions may deter non-listed wildlife from the area when work is occurring due to noise and human presence. These impacts would be minor and temporary in nature and conditions would return to normal when crews leave. The proposed actions would improve habitat conditions over the long term by increasing riparian plant density, diversity, and habitat structure.

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

Potential for Significance: No

Explanation: There are ESA-listed steelhead present in both creeks. No state special-status species occupy the project area. The project was reviewed and consulted on under BPA's Habitat Improvement Program (HIP) programmatic biological opinions and would adhere to all applicable site-specific conservation measures, including turbidity monitoring requirements.

Project work would occur in low to no flow conditions along the creeks. If there are high enough flows to support fish presence, project activities would temporarily disturb nearby fish due to crew presence in the stream. It is expected that fish would avoid the area when crews are present but would reoccupy the area immediately after crews leave. Water quality may decrease temporarily due to sediments disturbed during the installation of posts, but turbidity would be monitored during implementation. Impacts would be minimized by following BPA's HIP requirements and conservation measures. In the long term, this project would increase fish habitat complexity and floodplain connection. Activities would not impact or change waterbodies or floodplains.

6. Wetlands

Potential for Significance: No

Explanation: Project activities would take place instream. There are no wetlands located in the project areas; therefore, there would be no impact to wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No new wells or use of groundwater are proposed. No herbicide use is proposed. The proposed actions would have no impacts to groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The underlying land use would not change and there would be no impact to specially-designated areas. The property is under private ownership and would remain so after the project.

9. Visual Quality

Potential for Significance: No

Explanation: The proposed work would have little to no effect on visual quality. Posts added to existing structures would not look much different than the rest of the structure. Over time and as material accumulates in the structures, they would begin to look like a natural part of the stream.

10. Air Quality

Potential for Significance: No

Explanation: There would be minor, temporary effects to the air quality of the environment from exhaust due to vehicle use for site access. Normal conditions would return upon project completion.

11. Noise

Potential for Significance: No

Explanation: The proposed work would result in a temporary increase in ambient noise. Any noise emitted from crews or vehicles would be short-term and minor, would occur during daylight hours, and would cease following project completion.

12. Human Health and Safety

Potential for Significance: No

Explanation: The proposed work is not considered hazardous, nor does it result in any health or safety risks to the general public. There would be no soil contamination or hazardous conditions. Use of equipment, such as a hand-held hydraulic post hole driver, would have some known risks that could be mitigated with best management practices by crews implementing the project.

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: ACCD has signed agreements with the private landowners and has coordinated the work and schedule with them.

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

Signed: JACQUELYN SCHEI

Digitally signed by JACQUELYN SCHEI
Date: 2025.07.30 10:08:56 -07'00'

Jacquelyn Schei
Environmental Protection Specialist