Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Tower Creek Culvert Replacement at East Tower Creek Road

Project No.: 2010-072-00

Project Manager: Eric Leitzinger, EWM-4

Location: Lemhi County, Idaho

Categorical Exclusion Applied (from 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), along with the Federal Highway Administration Culvert Aquatic Organism Passage Program, proposes to fund the Idaho Department of Fish and Game (IDFG) to replace an undersized culvert on Tower Creek at its junction with East Tower Creek Road. The culvert is perched and has become a barrier to aquatic organism passage, including for Endangered Species Act (ESA)-listed Chinook salmon (*Oncorhynchus tshawytscha),* steelhead (*O. mykiss*), and bull trout (*Salvelinus confluentus*) trying to migrate upstream.

The current culvert is an elliptical corrugated metal pipe (CMP) with a span of 5.5 feet, a rise of 4 feet, and a length of 122 feet. IDFG would remove the CMP and replace it with a metal arch pipe with a span of 20 feet, a rise of 16 feet, and a length of 113 feet. Work would occur in the existing road prism of East Tower Creek Road. The new pipe would be set on pre-cast concrete footings buried in the stream banks. Once the new culvert is installed, the roadbed would be reconstructed to match the material and grade of the existing road. The stream bed under the new structure (approximate length of 125 feet) would be filled with native streambed materials and boulders and graded to match the existing stream bed on the upstream and downstream ends.

In-water work would occur during the approved work window (July through mid-August). Erosion controls and a stream bypass would be installed per approved plans. Stranded aquatic organisms would be captured and moved out of the construction zone prior to dewatering the channel. Culvert removal and construction would entail the use of heavy equipment such as an excavator and dump truck. Willows in proposed excavation areas would be salvaged and replanted after construction. The project would use two staging areas – one on the west side of the creek on an existing gravel pull-out along the adjacent Tower Creek Road and the other in a pasture on private land to the east of the creek. Two temporary access routes through private land (less than 200 feet total) would be used for equipment access on each side of the creek. The project would reroute local traffic using a temporary gravel bypass road (approximately 400 feet long) connecting Tower Creek Road to East Tower Creek Road, per an approved traffic control plan. After construction, all temporary access routes and compacted areas outside the existing roadway would be roughened and seeded or hydroseeded with a native plant seed mix. IDFG would monitor success of establishment of native plant communities in the project area for several years and do additional seeding or planting if needed. If monitoring finds that invasive plants are encroaching on the site, the project area would be treated with herbicides.

Funding the proposed activities fulfills commitments under the 2020 National Marine Fisheries Service (NMFS) Columbia River System Biological Opinion and the 2020 U.S. Fish and Wildlife Service (USFWS) Columbia River System Biological Opinion. These actions also support Bonneville's ongoing efforts to mitigate for effects of the Federal Columbia River Power System 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 the current *DOE National Environmental Policy Act (NEPA), Implementing Procedures*, 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.

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Jacquelyn Schei
Environmental Protection Specialist

Concur:

SARAH BIEGEL
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Sarah T. Biegel
NEPA Compliance Officer

Attachment(s): Environmental Evaluation

Categorical Exclusion Environmental Evaluation

This evaluation 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: Tower Creek Culvert Replacement at East Tower Creek Road

Project Site Description

The culvert is located on East Tower Creek Road, approximately 11 miles north of Salmon, in Lemhi County, Idaho. The juncture of Tower Creek Road and East Tower Creek Road, both gravel roads managed by Lemhi County, is less than 2 miles from State Highway 93. Tower Creek provides important spawning, rearing, and migration habitat for ESA-listed salmonids and native fish. The road surface is approximately 30 feet higher than Tower Creek, resulting in disconnection of the floodplain. Floodplain areas have been converted to pasture (U.S. Bureau of Land Management-managed and privately-owned) and rural residential land uses. There is also limited native riparian vegetation along the creek in the project area.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: On September 5, 2025, BPA initiated consultation with the Shoshone-Bannock Tribes and Idaho State Historic Preservation Office (SHPO) (BPA Cultural Resources No. ID 2024 035). On September 11, 2025, SHPO concurred with the area of potential effects and approach for geotechnical monitoring. On January 20, 2026, BPA made a determination of No Historic Properties Affected. On January 29, 2026, SHPO concurred with BPA's determination. No additional comments were received by the end of the 30-day review period.

2. Geology and Soils

Potential for Significance: No

Explanation: There would be temporary impacts on geology and soils due to displacement and compaction of soil from the operation of heavy equipment to remove the existing culvert, install a new culvert, and create temporary access and bypass roads. Erosion and sediment control best management practices would be implemented prior to work to minimize potential for instream turbidity or excessive runoff during construction. The road prism and surface would be constructed and graded to match the existing roadway. Work areas would be decompacted and seeded with native plant species after construction to facilitate soil recovery. Impacts to biological components of soils from herbicide application would be minimized by application according to manufacturer's labels and compliance with the conservation measures in BPA's Habitat Improvement Program ESA Section 7 programmatic consultations (HIP BiOp). Herbicide treatment would be intended to improve long-term habitat conditions by preventing further establishment of invasives.

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

Potential for Significance: No

Explanation: No ESA-listed species or state special-status plants are known to be present in the project area. There would be temporary impacts to existing vegetation including crushing and removal by heavy equipment, excavation, and trampling from work crews. Impacts would be minimized by using existing access routes where possible and decompacting

soils in work areas, including temporary access and bypass routes, and seeding those areas after construction with a native plant seed mix. Minor and temporary vegetation disturbances would occur as part of herbicide application but would have short-term effects. Impacts of herbicide applications would be minimized by implementation of proposed actions according to BPA's HIP BiOp, including use of approved herbicides and application methods, having a licensed applicator, and minimizing drift and overspray. In the long term, there would be beneficial effects from removal of competitive invasive plants, allowing native plant communities to establish themselves after construction.

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

Potential for Significance: No

Explanation: No ESA-listed or state special-status wildlife species or habitats are within the project site. The USFWS Information for Planning and Conservation (IPaC) tool lists the Canada lynx (*Lynx canadensis*) and the North American wolverine (*Gulo gulo luscus*), both ESA-listed Threatened, as having the potential to be in the project area. In addition, IPaC lists 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 the project area. There are no critical habitats for ESA-listed or proposed species in the project area and no confirmed presence of any of the species in the project area. Due to current agricultural land use practices, lack of native vegetation, and proximity to Highway 93, East Tower Creek Road, and residences, it is highly unlikely these species would be present. Therefore, there would be no impact to ESA-listed or proposed wildlife species from the project.

IPaC information indicates that it would be unlikely for bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*) to be present in or near the project area during the time of year when proposed activities would occur. There is no confirmed presence of nests or previously used nest sites for either species in the project area. If a nest is observed in the project area, IDFG would employ protection measures (*e.g.,* timing, distance) as necessary to ensure eagles would not be harmed as a result of the project. Therefore, the project would have no adverse impacts to bald and golden eagles.

No wildlife habitat would be modified to a degree that would permanently displace resident wildlife, though some may be temporarily displaced by disturbance from construction activities and human presence. Herbicide application would have short-term impacts to wildlife that would be minimized by following the conservation measures in BPA's HIP BiOp, such as not applying herbicides during migratory bird nesting season and minimizing overspray and drifting.

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

Potential for Significance: No with Conditions

Explanation: ESA-listed Chinook salmon, steelhead, and bull trout are found in the project area. The project was reviewed and consulted on under BPA's HIP BiOp and would adhere to all applicable conservation measures, including turbidity monitoring requirements, approved work timing, work area isolation, and following buffer requirements for herbicide application. Excavation for culvert removal and replacement would have temporary negative impacts to fish and fish habitat, specifically sediment transport and delivery and displacement of individuals. The work area would be isolated prior to construction and an aquatic organism salvage would occur prior to dewatering the area. Some aquatic invertebrates and amphibians may not be salvaged and would be displaced or killed by mechanical activities. Re-occupation of the area by the same or other members of the same classes of animals immediately following construction is anticipated. Ground-disturbing activities would increase the risk of erosion and sedimentation during and immediately after excavation activities. This increase would be limited to the time of construction, primarily during excavation, would not be expected to last more than several hours, and would be mitigated by the use of erosion control measures throughout project construction. Herbicide application may have effects for ESA-listed species in the project area. However, the

project would follow BPA's HIP BiOp conservation measures to minimize impacts. No herbicide would be applied in water. Overall, the proposed actions would improve long-term conditions for fish by removing a passage barrier and providing access to upstream habitat. The project would obtain a required permit issued by the U.S. Army Corps of Engineers under Section 404 of the Clean Water Act and a Section 401 water quality certification from Idaho Department of Environmental Quality. The project would adhere to all requirements and prescriptions set forth in the permit and certification.

Notes:

- Prior to in-water construction, IDFG would obtain a Clean Water Act Section 404 permit and Section 401 certification and adhere to all terms and conditions.

6. Wetlands

Potential for Significance: No

Explanation: The USFWS National Wetlands Inventory information shows that no wetlands are present in the project area. Therefore, the project would not have an impact on wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No new wells or uses of groundwater are proposed. There would be potential for contamination of groundwater from fuel or fluid drips or spills from the heavy equipment used, but spills and drips with the volume necessary to contaminate groundwater are unlikely. Onsite spill kits would also minimize the potential for spills and drips to be of sufficient quantity to contaminate groundwater. Herbicide impacts to groundwater and aquifers would be minimized by application according to the manufacturer's label and following BPA's HIP BiOp requirements.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The underlying land use (agriculture, cattle grazing) would not change. The project is not located in a specially-designated area or Wild and Scenic River. There are no public recreational opportunities in the project area.

9. Visual Quality

Potential for Significance: No

Explanation: Short-term changes to the landscape would occur during construction, such as work zone conditions, vehicles, equipment, and a temporary bypass route for traffic. The proposed work would have little effect on long-term visual quality. The structural changes for the culvert replacement would be made within the footprint of the existing roadway and would not change the overall visual character of the landscape as seen from the roadway.

10. Air Quality

Potential for Significance: No

Explanation: There would be minor, temporary effects to air quality from exhaust and dust from vehicles and equipment and from herbicide applications. Herbicide effects would be minimized by application according to the manufacturer's label and following BPA's HIP BiOp requirements. Normal conditions would return upon project completion.

11. Noise

Potential for Significance: No

Explanation: There would be some short-term noise impacts from the heavy equipment used for the project. Noise emitted from equipment would be temporary and 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. Operating construction vehicles and equipment inherently carries potential safety risks to operators; however, staff training and implementing best management practices, such as daily on-site safety precautions, would minimize that risk during construction activities. The temporary bypass route for local traffic would be implemented according to an approved traffic control plan and have adequate signage to warn drivers. Herbicide application poses a slight risk of skin and eye irritations. Work would follow BPA's HIP BiOp requirements, including having a licensed applicator that would develop an herbicide transportation and safety plan before transporting or applying any herbicides, thus making the risk from herbicides insignificant.

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 project actions would occur in coordination and with written approval from private owners. IDFG would obtain required permits from the Lemhi County road department prior to any construction.

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

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