

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Invasive Plant Treatments and Hydroseeding on Restoration Sites in the Upper Salmon

**Project No.:** 2010-072-00

**Project Manager:** Eric Leitzinger, EWM-4

**Location:** Lemhi and Custer Counties, 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) proposes to fund the Lemhi Soil and Water Conservation District (Lemhi SWCD) to treat invasive plants and hydroseed annually at habitat restoration projects or fish screening facilities in the Upper Salmon basin in Idaho. Proposed actions would help eradicate invasive plant species in project areas and allow establishment of native plant communities along streams to reduce erosion, capture stormwater, and provide cover and shade, all of which would support Endangered Species Act (ESA)-listed Chinook salmon (*Oncorhynchus tshawytscha*), steelhead (*O. mykiss*), and bull trout (*Salvelinus confluentus*) present in the basin.

Hydroseeding would be applied by spraying a county-approved weed free seed mix from trailer-mounted hydroseeding equipment towed by a pickup truck. Hydroseeding would occur on up to 10 acres on each restored site.

Invasive plant treatments would involve chemical control by spot spraying herbicides by hand with a wand or backpack sprayer, using a boom sprayer mounted to an ATV (e.g., for roadsides or larger infestations in upland areas), and wiping on cut stems/stumps. No aerial application of herbicide would occur. Treatments would be done in late spring or early summer and applied in accordance to the label instructions and based on species ecology, proximity to resources (streams, wetlands, known presence of ESA-listed species), proximity to human activity, and feasibility.

Proposed treatment sites are listed in Table 1. Project sites would be accessed via established roads or routes previously established by the original construction project. In many project areas, infestations do not cover 100 percent of the ground and spot treatments covering a few square feet would occur. In upland areas where more ground is covered by invasive plants, larger areas would be treated but would be limited to treatment under 20 acres. Riparian areas would only receive spot treatments.

Initial treatments would not likely be 100 percent effective for invasive plant control since dormant seeds from existing populations would likely germinate in following years. Therefore, follow-up treatments would be needed for several years, with the expectation that the need for treatment would decline over time. The proposed action would apply the herbicides and methods prescribed

in BPA's Habitat Improvement Program programmatic ESA consultations (HIP BiOp). The actions would not require new ground disturbance and none of the plants to be treated are identified as being culturally important. Culturally important areas within the sites have been identified during the Section 106 consultations for the original restoration work or screen facility construction and would be avoided.

Table 1. Locations of proposed hydroseeding and invasive plant control on previous restoration sites in the Lemhi and Pahsimeroi River subbasins.

<b>Site</b>	<b>Latitude</b>	<b>Longitude</b>	<b>Subbasin</b>
Dingey Restoration Project	45.50246	-113.958251	Lemhi
Henry Reach (all phases)	44.89964	-113.627132	Lemhi
Kenney Creek	45.03151	-113.662606	Lemhi
Krenz Ditch Decommission	44.55151	-113.887196	Pahsimeroi
L20 fish screen and bypass	45.04659	-113.678944	Lemhi
L21 fish screen and bypass	45.04155	-113.676416	Lemhi
L26 fish screen and bypass	45.0093	-113.65683	Lemhi
L27 fish screen and bypass	44.99342	-113.653061	Lemhi
L28 fish screen and bypass	44.98806	-113.649467	Lemhi
L32 fish screen and bypass	44.92268	-113.633053	Lemhi
L33 fish screen and bypass	44.92075	-113.634567	Lemhi
L44 fish screen and bypass	44.83094	-113.610966	Lemhi
L45A fish screen and bypass	44.81523	-113.580471	Lemhi
L45B fish screen and bypass	44.80919	-113.573851	Lemhi
L51 fish screen and bypass	44.76693	-113.506807	Lemhi
L51A fish screen and bypass	44.76268	-113.501568	Lemhi
L58B fish screen and bypass	44.73633	-113.448465	Lemhi
L59 fish screen and bypass	44.72772	-113.421506	Lemhi
LBSC02 fish screen and bypass	44.7244	-113.425744	Lemhi
LWC03 fish screen and bypass	45.10205	-113.709599	Lemhi
LCR - Lower Pahsimeroi	44.63235	-113.999005	Pahsimeroi
LCR - Upper Pahsimeroi	44.62889	-113.99493	Pahsimeroi
Lower Duck Creek	44.5933	-113.9939893	Pahsimeroi
Lower Lemhi Reference Reach (all phases)	45.15895	-113.834146	Lemhi
LWC03 fish screen and bypass	45.10205	-113.709599	Lemhi
Middle Lemhi Hayden Reach (all phases)	44.8621	-113.622437	Lemhi
Muddy Springs Culvert	44.58331	-113.945834	Pahsimeroi
O'Neal (Idaho Department of Lands and private)	44.526461	-113.848457	Pahsimeroi
River Mile 32 (all phases)	44.87911	-113.628737	Lemhi
SNF03 fish screen and bypass	45.43299	-113.991912	North Fork Salmon
Ty Cole Restoration	45.46841	-113.992081	Lemhi

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 BPA'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.

Jacquelyn Schei  
Environmental Protection Specialist

Concur:

Katey C. Grange  
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:** Invasive Plant Treatments and Hydroseeding on Restoration Sites in the Upper Salmon

## **Project Site Description**

Project sites are located in Lemhi and Custer counties in Idaho, mainly near the Lemhi and Pahsimeroi rivers. Each site is on public or privately-owned land within previously implemented habitat restoration projects or existing fish screening facilities funded by BPA. Sites are typically in broad riparian floodplains within a sagebrush steppe ecosystem, and at locations where much of the floodplain and surrounding productive sagebrush steppe lands have been converted to agricultural and grazing uses supported by irrigation diversions from the rivers. Sites would be accessed via existing roads, including farm roads, and are on land that has been previously disturbed.

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

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

Potential for Significance: No

Explanation: Section 106 consultations have been completed for restoration actions at all sites prior to implementation of those projects. Herbicide application and hydroseeding would occur in restoration areas, would not affect any buildings or infrastructure, and would not involve ground disturbance. Therefore, there is no potential to cause effects to historic or cultural resources.

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

Potential for Significance: No

Explanation: Sites would be accessed using existing routes. 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 programmatic ESA consultations (HIP BiOps). Herbicide treatment would be intended to improve long-term habitat conditions by preventing further establishment of invasives. Hydroseeding would support establishment of native plant communities that would help reduce erosion and benefit fish and wildlife species.

### **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 project areas. The USFWS Information for Planning and Conservation (IPaC) tool lists the whitebark pine (*Pinus albicaulis*), ESA-listed as Threatened, as having the potential to be in project areas. However, decades of agricultural practices along streams and surrounding areas in the Upper Salmon basin have limited habitat for the whitebark pine. None of the proposed activities would have soil disturbance that would impact whitebark pine. Therefore, proposed activities would not impact any ESA-listed plant species.

There may be minor and temporary impacts to existing native vegetation including crushing as a result of crew access to weed treatment areas and potential removal as a result of overspray. Impacts would be minimized by implementation of proposed actions according

to BPA's HIP BiOps, 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.

#### **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 known to exist within the project areas. IPaC lists the Canada lynx (*Lynx canadensis*), grizzly bear (*Ursus arctos horribilis*), North American wolverine (*Gulo gulo luscus*), and the yellow-billed cuckoo (*Coccyzus americanus*), all ESA-listed Threatened, as having the potential to be in one or more of the project areas. 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 project areas. There are no critical habitats for ESA-listed or proposed species in any of the project areas and no confirmed presence of any of the species in the project areas. Due to current agricultural/grazing land use practices surrounding most project sites, nearby residences and access roads, routine worker presence at fish screen sites, and recent construction at habitat restoration sites it is unlikely these species would be present in project areas. Therefore, there would be no impact to ESA-listed or proposed wildlife species from the project.

Bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*) are present in Custer and Lemhi counties year-round. There is no confirmed presence of nests or previously used nest sites for either species in the project areas. Sites are typically in areas without much tree coverage because they are near agricultural fields and some are in newly restored areas where vegetation is not mature. Noise and human presence would have minor, temporary impacts that may cause eagles to avoid the area while work is conducted. There would be no long-term effect on eagles or their habitat. If a nest is observed in any project area, Lemhi SWCD would employ protection measures (e.g., timing, distance) as necessary to ensure eagles would not be taken or otherwise harmed as a result of the proposed actions.

Impacts to non-listed wildlife would be minor and temporary in nature due to noise, human presence, and herbicide application. Human presence would cause sound and movement that temporarily disturbs or displaces local wildlife. Activities would likely temporarily displace medium-sized or larger animals from their preferred habitats, but they would likely re-occupy the site once human activity has moved or ceased. Effects to wildlife from herbicide application in the project area would be moderate. Invasive weed treatments could result in direct contact with herbicides for small animals still in the project area when work is performed. Medium and large-sized animals would likely leave the area before any treatments. Indirect contact with herbicides (e.g., dermal contact with sprayed vegetation, ingestion of contaminated vegetation) is possible but it is unlikely exposures would be lethal. The time of year when actions would be implemented may coincide with migratory bird nesting; however, plants to be removed do not support migratory bird nesting. Impacts would be minimized by following the conservation measures in BPA's HIP BiOp, such as using an approved list of products and application methods, application by a licensed applicator, and minimizing drift and overspray.

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

Potential for Significance: No

Explanation: ESA-listed Chinook salmon, steelhead, and bull trout are found in project areas. Presence of humans and herbicide application may have minor effects for ESA-listed species in the project areas. However, the project would follow BPA's HIP BiOp conservation measures to minimize impacts, such as following riparian buffer requirements, minimizing drift and overspray, and using a licensed applicator. No herbicide would be applied in water, nor would hydroseeding occur in water. Disturbance from human

presence and noise during implementation and reduction in weeds, which could lead to loss of shade for streams, may impact water bodies, floodplains, and fish. These impacts would be minor and short-term and with the adherence to HIP BiOp conservation measures would have minimal impacts. In the long term, project actions would help restore native riparian vegetation that would reduce soil erosion around streams, benefitting aquatic species, including ESA-listed fish, streams, and floodplains.

## **6. Wetlands**

Potential for Significance: No

Explanation: Proposed activities would not involve ground disturbance or filling in of any areas in or near streams or nearby wetlands. Herbicide application approved for use near water and wetlands may result in loss of vegetation in wetland areas; however, removing invasive species and hydroseeding with a native seed mix would provide the opportunity for native plant communities to become established. This would have a beneficial effect by contributing to the overall quality of wetlands.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: No new wells or uses of groundwater are proposed. Herbicide impacts to groundwater and aquifers would be minimized by application according to the manufacturer's label and following BPA's HIP BiOp requirements. The proposed actions would have no long-term impact to groundwater or aquifers.

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

Potential for Significance: No

Explanation: Access to sites is on existing road networks and all activities are compatible with local land use. Project sites are not located in any specially-designated areas or Wild and Scenic Rivers. The underlying land uses of the project sites would not change.

## **9. Visual Quality**

Potential for Significance: No

Explanation: Short-term changes to the landscape would occur as a result of proposed activities. Vehicles and work crews may be seen in project areas, hydroseed mix may be seen on the ground, and dead vegetation may be observed in areas treated with herbicides. The proposed work would have little effect on long-term visual quality and actions would help restore native vegetation in project areas.

## **10. Air Quality**

Potential for Significance: No

Explanation: There would be minor, temporary effects to air quality from exhaust and dust from vehicles and from herbicide applications. Herbicide application 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 vehicles and work crews. Noise emitted from vehicles and 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: Herbicide application poses a slight risk of skin and eye irritations to workers. All personnel would use best management practices to protect worker health and safety. 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: Proposed actions would occur in coordination and with written approval from private owners and public land managers and would typically be discussed during development of the original habitat restoration project or screen facility development.

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

Signed:

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