

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Coonskin Creek Fish Passage Project

Project No.: 2009-026-00

Project Manager: Jennifer Lord, EWU-4

Location: Umatilla County, Oregon

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 Confederated Tribes of the Umatilla Indian Reservation (CTUIR) to remove four fish passage barriers along Coonskin Creek in Umatilla County, Oregon, install a box culvert, and improve habitat quality and complexity in the project reach. The project would support passage during all flow conditions for resident fish and Endangered Species Act (ESA)-listed steelhead (*Oncorhynchus mykiss*).

There is an undersized culvert (5.5-foot-diameter, 70-foot-long corrugated metal pipe) at the crossing of Cayuse (County 900) Road and Coonskin Creek that is perched at low flows and presents a passage barrier for fish. Immediately downstream of the culvert (about 115 feet), Coonskin Creek flows over a concrete apron that spans the creek and impedes fish passage during low flow. The apron provided protection for the now decommissioned water supply pipe running through Coonskin Creek that historically served the town of Pendleton. About 10 feet downstream of the concrete apron, there are two log drop structures about 20 feet apart that span the creek and further impede fish passage.

The project would install an open bottom, box culvert with a natural substrate bottom located approximately 30 feet to the east of the existing culvert. The channel would be realigned, as described further below, through the new crossing. Work would entail cutting and disposing of about 100 feet of the paved roadway and excavating about 15 feet deep to remove the existing roadway fill and native material. The existing culvert would be removed and disposed of. The new culvert, spanning approximately 21 feet and measuring 55 feet in length, would be installed with precast concrete footings buried a minimum of 3 feet below the elevation of the proposed new streambed. The excavated area and the top of the new culvert would be covered in structural backfill and sloped to meet the existing road prism and grade. The road would be repaved to match the existing roadway. Guardrails would be installed along both sides of the road along the length of the new culvert.

A new channel segment to realign the creek through the new culvert would be excavated approximately 32 feet upstream and 350 feet downstream of the new culvert (up to 10 feet below existing ground; approximately 1,400 cubic yards of material). A minimum of 2 feet of streambed material would be added to the new channel segment. Seven pools would be created on the outside of bends downstream of the culvert. Multiple logs with root wads (up to four each) placed

along the pool bends would be incorporated to maintain pool depth through scour. Seven riffles would be constructed between pools and designed with stable bed material to maintain the grade of the realigned channel. Two alcoves would be created using log jams (up to two at each location) to backfill segments of the former channel with water—one near the former culvert outlet and one where the realigned channel connects to the existing channel at the downstream end of the project area. Two steel H-beams would be partially buried on each side of the creek at the transition between the new channel segment and existing channel to allow fencing to be inserted between the beams during low flows to prevent cattle from crossing. The fencing would be removed at high flows to allow debris to pass downstream.

The two log drop structures and the concrete apron, along with the rip rap on each side of the drop structures, would be removed. If possible, the logs would be reused in habitat features. The concrete apron would be crushed and used, along with the rip rap, to improve a private drive that would be used for construction access off Cayuse Road. In addition, the section of the water supply pipe within the project area, about 170 feet, would be excavated, cut at each end, removed and disposed of. The ends of the remaining pipe would be filled with cement to prevent collapse, capped, and reburied. The abandoned portions of the existing channel would be filled with up to 10 feet of native material (approximately 750 cubic yards) to maintain the new channel alignment, except the two locations where alcoves are proposed. Coonskin Creek is ephemeral and expected to be dry during proposed implementation dates (July 1 to August 15). However, if streamflow is present, the creek would be diverted or work areas would be isolated with coffer dams and a fish salvage would occur before dewatering actions.

Cayuse Road and an existing private drive on the east side of the channel, downstream of the culvert, would be used to access the project area. In addition to the concrete and rock added to the entrance, about 2 feet to 4 feet of excavated material with gravel would be added and graded to an appropriate slope to avoid flooding during high flow events. A staging area, approximately 0.2 acres, would be established in a field north of the creek along the west side of the private drive. Project activities would require the use of heavy equipment such as an excavator and dump truck. Construction would require temporary closure of Cayuse Road (approximately 2 weeks) and would follow an approved Traffic Control Plan. Detour signs would be posted throughout the alternate route which would include turning off Cayuse Road at County Road 751 (eastbound traffic) or Thornhollow Road (westbound traffic) and using Duff Road as a connector between the two.

Existing roads used to access the site would be restored to original or better conditions and revegetation activities would take place in all other areas disturbed by construction. The project would be seeded with a native seed mix and planted with native trees and shrubs (seedlings and cuttings) appropriate for the riparian or upland zone being planted. Inspection and maintenance of the project site would occur annually for several years and could include minor adjustments to banks, the channel bed, and wood structures to ensure functionality of the system and prevent erosion of the culvert footings, as well as additional vegetation plantings within the project area as needed until a native plant community is established. If needed, herbicide applications would be applied in subsequent years if monitoring shows encroachment by invasive species.

Funding the proposed activities would support conservation of ESA-listed species considered in the 2020 National Marine Fisheries Service Columbia River System Biological Opinion. These actions also support 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: Coonskin Creek Fish Passage Project

Project Site Description

The project is about 1,500 feet upstream from the confluence of Coonskin Creek and the Umatilla River, approximately 14 miles east of Pendleton in Umatilla County, Oregon. The site is within the boundaries of the Confederated Tribes of the Umatilla Indian Reservation and most of the site is on tribal trust land. Coonskin Creek crosses a county-maintained road and the small portion of the project on the upstream (south) side of the culvert is on private property. Coonskin Creek is an ephemeral stream that only flows in winter months during times of substantial precipitation and is completely dry in summer months. It is utilized by steelhead for spawning and juvenile rearing and has been designated critical habitat for steelhead. The site is bordered by croplands and grasslands used for cattle grazing and has a mixture of native and invasive plant species throughout the site.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: BPA sent a letter to consulting parties with a finding of no adverse effect to historic properties on February 25, 2026 (BPA CR Project No.: OR 2024 100). Consulting parties included CTUIR and the CTUIR Tribal Historic Preservation Office (THPO). THPO responded with a request for an archaeological monitor during ground disturbing activities in areas that could not be included in the cultural resource survey effort because of dense vegetation or if excavation into the cutbank is needed. No comments from CTUIR were received by the end of the 30-day comment period.

Notes:

- An archaeological monitor would be present during ground disturbing work in areas that could not be surveyed due to thick vegetation, or if excavation into the cutbank is needed.

2. Geology and Soils

Potential for Significance: No

Explanation: There would be temporary impacts to geology and soils and an increase in erosion potential due to displacement and compaction of soil from the operation of heavy equipment for the installation of the new culvert, excavation of a new channel segment, and addition of logs with rootwads into banks. There would also be temporary impacts to soils from planting activities. Best Management Practices (BMPs) for erosion and sediment control would be followed to minimize instream turbidity and excessive runoff during work. If the stream is not completely dry during the implementation period, work areas would be isolated and dewatered to minimize erosion and turbidity. Work areas would be contoured to match the surrounding grade following construction and seeded and planted with native riparian or upland plant species 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 BiOps).

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

Potential for Significance: No

Explanation: No ESA-listed 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. Herbicide use would result in plant mortalities, mainly invasive species, but there may be some overspray onto native vegetation. Future herbicide impacts would be minimized by the use of approved herbicides and application methods, having a licensed applicator, and minimizing drift and overspray. In the long term, the project would have a beneficial effect on vegetation through seeding and planting of disturbed areas to help reestablish native plant communities and the removal of invasive plant species during subsequent monitoring, as needed.

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

Potential for Significance: No

Explanation: No Federal or state special-status wildlife species or habitats are documented within the project site. The U.S. Fish and Wildlife Service Information for Planning and Conservation (IPaC) tool lists the yellow-billed cuckoo (*Coccyzus americanus*), 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 wildlife 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, nearby residences and public roads, and lack of food sources, it is unlikely these species would be present in the project area, and the project would have no effect on ESA-listed or proposed wildlife species.

IPaC information indicates that bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*) are likely present in Umatilla County for several months of the year. There are no mature trees in the immediate project area and 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, CTUIR 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.

There would be temporary disturbances to wildlife due to human presence and equipment noise. Conservation measures would be used to minimize impacts. Equipment use would occur after nesting and breeding seasons of migratory birds. No habitats would be modified to any degree that might permanently displace resident wildlife, though some may be temporarily displaced by disturbance from equipment noise 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 BiOps, such as not applying herbicides during migratory bird nesting season and minimizing overspray and drifting. Wildlife would likely reoccupy the site following completion of the proposed activities. The proposed project is expected to improve aquatic and riparian habitat, which would have a beneficial effect for wildlife species in the long term.

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

Potential for Significance: No with Conditions

Explanation: Proposed actions would alter portions of the waterway and would temporarily disrupt aquatic life. Bull trout (*Salvelinus confluentus*), ESA-listed Threatened, and their critical habitat are present in the Umatilla River, but there is no documented presence of bull trout in Coonskin Creek. Therefore, the project would not affect bull trout. Steelhead, ESA-listed Threatened, and their critical habitat are present in Coonskin Creek and would be impacted

by the project. Construction activities, including excavation for the new alignment of the creek and culvert, would have temporary effects such as soil erosion and excessive runoff of sediment into the creek creating increased turbidity, whether the creek is flowing during construction or not until a later precipitation event. Herbicide application may also affect ESA-listed species in the project area. Adherence to conservation measures in BPA's HIP BiOps would minimize short- and long-term impacts. No herbicide would be applied in water and guidelines for buffer zones would be followed. 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 the CTUIR Department of Natural Resources Water Resources Program. The project would adhere to all requirements and prescriptions set forth in the permit and certification. In the long term, this project would improve passage for all life stages of steelhead and habitat for aquatic species.

Notes:

- Prior to in-water construction, CTUIR 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: CTUIR conducted a wetland delineation at the site, and no wetlands were identified. Therefore, the proposed project would have no impact to wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No new wells or use of groundwater are proposed. The proposed project would have no impact on groundwater or aquifers. Herbicide impacts to groundwater and aquifers would be minimized by application according to the manufacturer's label.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The underlying land use would not change. The tribal trust portion of the project area has been slated for restoration, and the private property would continue to be used for agricultural purposes. Cattle on the private parcel would be restricted from the immediate project area with temporary fencing during construction and would be able to return after construction is complete. The county road would be temporarily closed but would be closed in coordination with the county, have a detour in place, and would be reopened after construction of the culvert is complete. There would be no impact to specially-designated areas.

9. Visual Quality

Potential for Significance: No

Explanation: Temporary and permanent changes to visual quality would occur during and after the construction. Short-term changes to the landscape would occur during construction, such as work zone conditions, vehicles, equipment, and exposed soils. Approximately 385 feet of Coonskin Creek would be permanently realigned to flow through the new culvert. Proposed stream habitat improvements and native plantings would help return the project area to a more natural condition, which would improve visual quality overall in the long term.

10. Air Quality

Potential for Significance: No

Explanation: There would be minor and temporary effects on the air quality from dust and exhaust due to equipment and vehicle use for site access. Pre-project conditions would return upon project completion. Herbicide effects would be minimized by application according to the manufacturer's label.

11. Noise

Potential for Significance: No

Explanation: The proposed work would result in a temporary increase in ambient noise. The project area is mainly surrounded by agricultural fields; however, there are three residences less than 1,500 feet from the project area and residents would be able to hear construction noise. Any noise emitted from crews, equipment 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. All personnel would use best management practices to protect worker health and safety during implementation of proposed actions. A traffic detour would be implemented according to an approved traffic management plan, including adequate signage for road users. Herbicide application poses a slight risk of skin and eye irritations. Effects would be minimized by 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 activities would occur on private and tribal trust land and within a county-managed roadway. CTUIR has an agreement with private landowners for work to be conducted and has outlined plans and timing for the work. CTUIR is coordinating with the Bureau of Indian Affairs to obtain the appropriate approvals and permits to conduct work on the tribal trust property. CTUIR is coordinating with the Umatilla County Road Department on the culvert replacement designs and timing of the traffic detour.

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

Signed:

Jacquelyn Schei
Environmental Protection Specialist