

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Surface Elevation Table Installation at East Baker Bay/Chinook, Youngs Bay, and Blind Slough Marsh

Project No.: 2002-077-00

Project Manager: Allan Whiting, EWL-4

Location: Clatsop County, Oregon; Pacific County, Washington

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B 3.3 Research related to conservation of fish, wildlife, and cultural resources.

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to provide funding to the Pacific Northwest National Laboratory (PNNL) to install Surface Elevation Tables (SETs) at three tidal wetland research sites. Of the three sites, two SETs would be installed at East Baker Bay/Chinook, three at Youngs Bay, and three at Blind Slough Marsh. SETs are permanent instruments that measure millimeter-scale changes in wetland surface elevation over time. The goal of this study would be to investigate uncertainties regarding the physical and ecological impacts of the federal Columbia River System on the lower Columbia River estuary.

These actions would support conservation of ESA-listed species considered in the 2020 ESA consultations with both NMFS and USFWS on the O&M of the Columbia River System. 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.).

Access to the sites would be via boat and the foot to the SET sites. Each SET is a small-diameter pointed steel rod driven by hand in sections with a fence-post pounder, requiring no digging. The rod would be driven to refusal leaving a few inches exposed, and a temporary concrete cap/receiver head would be placed on top to stabilize the instrument and later removed.

All installation and monitoring would occur at low tide, when sites are accessible and free of standing water. The maximum disturbance footprint is about a 30-foot buffer around each SET location and would be limited to foot traffic and hand tools. Routine monitoring attaches a measurement arm to the rod end and would cause no ground disturbance.

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.

RYAN BART
Digitally signed by RYAN
BART
Date: 2026.10.20 12:19:31
-07'00'

Ryan Bart
Environmental Protection Specialist

Concur:

**KATEY
GRANGE**
Digitally signed by KATEY
GRANGE
Date: 2026.10.20 12:25:12
-07'00'

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: Surface Elevation Table Installation at East Baker Bay/Chinook, Youngs Bay, and Blind Slough Marsh

Project Site Description

All of the selected sites are periodically inundated by high tides. East Baker Bay is a 198-acre high-quality upland, wetland, riparian, open water, and floodplain habitat for fish and wildlife. The East Baker Bay site in Pacific County, Washington is owned by the Columbia Land Trust. The majority of the property is forested/shrub wetland, with mixed hardwood areas dominated by Sitka spruce and western red cedar, as well as wet shrubland and freshwater wet meadows and marshes. Salt/brackish marsh herbaceous wetlands run along the western edge immediately adjacent to the bay. The site is zoned as rural lands, with some portions in a special flood hazard area inundated by a 100-year flood.

The other two sites are in Clatsop County, Oregon. Daggett Point is an approximately 40-acre state-owned (Oregon Department of Forestry) parcel situated along Youngs Bay with PacifiCorp transmission infrastructure on site. Dominated by wetland species with sparse, short Sitka spruce, and zoned as Special-Aquatic & Riparian, the site consists of isolated, undiked tidelands and intertidal wetlands featuring small sloughs that drain into the bay. Blind Slough Marsh (also known as Blind Slough Swamp Preserve) is a 902-acre tidally-influenced wetland preserve owned and managed by the North Coast Land Conservancy (NCLC) that is accessible to the public via boat. Bordered on three sides by tidal sloughs and adjacent to the Lewis and Clark National Wildlife Refuge, the preserve represents the high-quality old-growth Sitka spruce swamp habitat that provides for wildlife and fish, including coho salmon, bald eagles, osprey, river otters, beavers, and migratory songbirds.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: BPA completed National Historic Preservation Act Section 106 consultation for the eight SET installations in the lower Columbia River estuary with a finding of no historic properties affected (§36 CFR 800.4(d)(1)). On June 2, 2026, BPA initiated consultation with the Confederated Tribes of Grand Ronde, Cowlitz Indian Tribe, Shoalwater Bay Tribe, Confederated Tribes of the Chehalis Reservation, Washington State Department of Archaeology and Historic Preservation (DAHP), and Oregon State Historic Preservation Office (OR SHPO). DAHP concurred with the finding on the same day, and OR SHPO acknowledged the request and assigned Case No. 26-0425. The 30-day comment period closed on July 2, 2026, with no additional comments received.

Notes:

- In the unlikely event that cultural material would be inadvertently encountered during the implementation of this project, BPA would require that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA in consultation with the appropriate consulting parties.

2. Geology and Soils

Potential for Significance: No

Explanation: The project involves no excavation, grading, or fill. Steel rods would be driven by hand using a fence-post pounder, causing minor soil displacement only at the point of entry. Subsurface geology, soil horizons, and soil profiles would not be affected, and there would be no impact to geology and soils.

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

Potential for Significance: No

Explanation: In accordance with the Endangered Species Act (ESA), BPA obtained an official species list from U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPAC) on August 5, 2026, across all three wetland sites. No federal or state listed plant species were identified with the potential to occur; therefore, there would be no effect to listed plants. Installation would be limited to manual tools and foot traffic, keeping vegetation disturbance minimal. Hand-carried equipment avoids soil compaction and root damage, while foot traffic disperses load across the marsh surface. No clearing or digging is needed, and any incidental plant disturbance is temporary, with regrowth expected within the same growing season. Therefore, the likelihood of effects to non-listed plants would be low, and any potential impacts would be minimal.

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

Potential for Significance: No

Explanation: No state-listed wildlife occurrences were identified within the vicinity. Through the IPaC species list, the following ESA-listed species were identified as potentially occurring in the area: Columbian white-tailed deer, marbled murrelet, streaked horned lark, western snowy plover, yellow-billed cuckoo, and northern spotted owl. The minimal ground disturbance and associated noise from pounding small-diameter steel rods into sediment and placing concrete caps on each rod is not expected to impact habitat or individuals of any common wildlife species or sensitive species. Therefore, the proposed project would have no effect on any federally listed or sensitive species.

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

Potential for Significance: No

Explanation: Project areas are considered critical habitat for bull trout, Chinook salmon (Lower Columbia River evolutionarily significant unit (ESU)), Chinook salmon (Snake River fall-run ESU), Chinook salmon (Upper Columbia River spring-run ESU), Chinook salmon (Upper Willamette River ESU), chum salmon (Columbia River ESU), coho salmon (Lower Columbia River ESU), sockeye salmon (Snake River ESU), steelhead (Lower Columbia River DPS), steelhead (Middle Columbia River DPS), steelhead (Snake River Basin distinct population segment (DPS)), steelhead (Upper Columbia River DPS), steelhead (Upper Willamette River DPS), and green sturgeon (Southern DPS). Coastal cutthroat trout and Pacific lamprey are also species of interest in the project area. A separate search for state-listed fish species was also conducted, and no additional species were found. The project would have no effect on any of these listed fish species, species of interest, or their designated critical habitat, because SET installations would occur at low tide in the marsh, when the site is naturally exposed and fish are not present. Work would be limited to hand placement on the marsh surface with no in-water work, dewatering, or turbidity; therefore, the project would have no effect on water bodies or floodplains. SET installations would assist with a better understanding of long-term changes to estuary elevations and habitat for ESA-listed salmonids in the Columbia Basin.

6. Wetlands

Potential for Significance: No

Explanation: Minimal disturbance to wetlands would occur during the installation of the proposed SET devices. Researchers would install SETs during low tide periods to minimize impacts

of traveling by foot into the sites. No substantial modification of wetlands would occur as a result of the proposed project.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The project sites are located in tidally-influenced marsh. No deep excavation or drilling that could intersect with groundwater or aquifers is proposed. The project would not impact groundwater resources or the nearby community water system wells.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The proposed activities would not change existing land use. Public access to the SET sites is limited and difficult to reach by road. Recreational boaters use the waterways surrounding these marshes, but the sites themselves are not developed for public use and would not be affected by the proposed work. Activities are limited to localized ground disturbance and installation of small-diameter monitoring equipment; therefore, the existing land use would remain unchanged. The East Baker Bay/Chinook protected property is encumbered by a conservation easement (COLSR-WL-26). The purpose of the conservation easement is to allow for the restoration or enhancement of the conservation values, including native self-sustaining habitat and designated critical habitat for ESA-listed salmonids. The installation of SETs at East Baker Bay/Chinook falls within the permitted activities of the conservation easement. There are no specially designated areas at these sites.

9. Visual Quality

Potential for Significance: No

Explanation: The steel rods would be driven flush with the marsh surface, making them visible only at close range. Once installation is complete, the work area would appear undisturbed with no above-ground structures or equipment remaining, preserving the natural viewshed.

10. Air Quality

Potential for Significance: No

Explanation: No substantial air quality effects would occur. A small number of boat trips to reach the general area would produce minor temporary exhaust emissions, but these emissions would be negligible given the infrequent access schedule. All on-site installation and monitoring would be done with a manual fence-post pounder and there would be no vehicles, grading, or mechanical disturbance that would cause changes to air quality.

11. Noise

Potential for Significance: No

Explanation: Boat motors used to access the site would generate noise during transit, but those trips would be infrequent, short in duration, and comparable to the ambient noise from recreational boat use already in the area. Setting the steel rods in the marsh with a post driver would produce percussive impact noise each time the driver strikes a rod. This noise would be intermittent and short-lived, occurring only during the brief period when each rod is being set. The work area is far from common areas that people frequent, therefore the sound would be barely audible at those locations and would not persist. Once all rods are in place, the noise source would be removed entirely.

12. Human Health and Safety

Potential for Significance: No

Explanation: The proposed activities are not considered hazardous, nor would they result in any health or safety risks to the general public. During manual installation of the SETs, researchers are at risk to slip, trip, and fall hazards while navigating the muddy, periodically inundated tidal wetlands as well as safety risks related to rapid tidal changes and environmental exposure; these risks would be reduced by monitoring local tide tables and adhering to established field safety protocols.

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: Researchers would coordinate with the landowners for each site and obtain all necessary permissions prior to fieldwork: the Columbia Land Trust (East Baker Bay/Chinook), the Oregon Department of Forestry (Youngs Bay), and the North Coast Land Conservancy (Blind Slough Marsh).

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

Signed: **RYAN BART**
Ryan Bart
Environmental Protection Specialist

Digitally signed by RYAN BART
Date: 2026.10.20 12:19:55
-07'00'