Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: ODFW Willamette Wildlife Areas Operations and Maintenance

Project No.: 2011-004-00

Project Manager: Virginia Preiss – EWM-4

Location: Clackamas, Polk, Lane, Benton, Multnomah, and Columbia Counties, Oregon

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.3 Routine maintenance, B1.20 Protection of cultural resources, fish and wildlife habitat

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to fund the Oregon Department of Fish and Wildlife (ODFW) to conduct routine operations and maintenance (O&M) actions on ten wildlife management areas (WMAs) in the Willamette Valley. Funding for this work partially fulfills commitments made by BPA in the 2010 "Willamette River Basin Memorandum of Agreement Regarding Wildlife Habitat Protection and Enhancement between the State of Oregon and the Bonneville Power Administration" and is part of ongoing efforts to mitigate for the impacts to fish and wildlife from the construction and operation of Federal flood control and hydroelectric facilities in the Willamette River Basin.

The Willamette Wildlife Mitigation Program (WWMP) oversees O&M and restoration activities on more than a dozen WMAs spread throughout the Willamette River basin. BPA funding would be used for ongoing activities on ten of these WMAs:

- Coyote Creek South (CCS)
- Coyote Creek Northeast (CCNE)
- South Coyote II (SCII)
- South Coyote III (SCIII)
- Flight's End (FE)
- Gail Achterman Wildlife Area (GAWA)
- Herbert Farms Natural Area (HFNA)
- Palensky Wildlife Area (PWA)
- Big Island (BI)
- Sorenson Meadows (SOR)

Project actions would be aimed at maintaining and improving wildlife habitat across the WMAs. Actions would include:

Vegetation Management

ODFW would conduct routine vegetation management programs across all WMAs. These actions would be focused on removing noxious, invasive, and undesirable vegetation to improve conditions for native plant species. Particular focus would be given to controlling reed canarygrass

(*Phaleris arundinacea*), which has aggressively colonized many riparian areas on a number of the WMAs. Vegetation would be removed with a combination of manual methods (hand pulling, clipping), mechanical methods (mowing, weed whacking), and chemical methods (herbicide application) as appropriate. Prescribed burns would also be conducted on upland prairie sections of CCS and HFNA. Following treatment, areas would be re-seeded or planted with desirable native species. Newly planted areas would be monitored and further weeded, mulched, and fertilized as needed.

Road, Fence, and Other Infrastructure Maintenance

Roads, fences, parking lots, and other existing infrastructure on the WMAs (access gates, culverts, water control gates, etc.) would be maintained. All road work would occur within existing road prisms and consist of routine maintenance activities, such as filling potholes with gravel, clearing ice and snow during winter months, collecting and disposing of trash and debris, and trimming encroaching vegetation. Parking lot maintenance would be similar in nature. Maintenance of culverts and water control gates would include routinely clearing debris and making repairs to maintain function of the infrastructure. No new construction would occur and all maintenance would be like-for-like replacements. Existing fencing segments on the WMAs would also be routinely inspected for damage. Any segments damaged by wildlife, vandalism, or the elements would be repaired or replaced with like-for-like fencing. No new fencing segments would be constructed. Information and access signs (hunting and trespass posting, parking notices, etc.) would also be maintained, replaced, and repaired as necessary.

Debris Removal

ODFW would remove garbage and debris from the WMAs as needed. Natural debris, such as wood and sediment deposited during high flow events of streams and rivers that neighbor WMAs, would not be moved unless it is negatively impacting the local habitat. Trash left from visitors to the WMAs would be collected by hand and disposed of appropriately. ODFW would contact waste disposal services and local authorities if any large items (abandoned vehicles, old appliances, etc.) are left on the WMAs to ensure proper removal.

Fish, Plant, Animal, and Habitat Surveys

ODFW staff would conduct surveys of fish, plants, and wildlife on all WMAs. Routine surveys of animals, plants, and habitats would be conducted on foot by ODFW staff. Opportunistic observations during other project activities would also be recorded. Particular focus would be given to conducting population counts of Endangered Species Act (ESA)-listed species and Oregon Conservation Strategy species present on the WMAs. Additionally, ODFW staff would conduct population counts of fish and other aquatic species and monitor water conditions in waterbodies on all WMAs using waders, small watercraft (canoes, rowboats), or on foot from the banks. All surveys would be visual only and would not involve any direct interaction with the fish, plants, or animals.

Findings: In accordance with Section 1021.410(b) 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), BPA has determined that the proposed action:

1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and

3) has not been segmented to meet the definition of a categorical exclusion.

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

/s/ Thomas DeLorenzo
Thomas DeLorenzo
Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel *July 27, 2023*
Sarah T. Biegel Date
NEPA Compliance Officer

Attachment(s): Environmental Checklist

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: ODFW Willamette Wildlife Areas Operations and Maintenance

Project Site Description

The Willamette Valley is a 150-mile long valley in central Oregon. It is surrounded by mountains on three sides – the Cascade Range to the east, the Oregon Coast Range to the west, and the Calapooya Mountains to the south. The Willamette River flows through the entire length of the valley. Historically, the Willamette Valley hosted a mosaic of oak forests, prairie savanna, tall grasslands, and groves of Douglas-fir (*Pseudotsuga menziesii*) trees. Floodplains of the river and its numerous tributaries contained extensive wetlands dominated by stands of willow (*Salix*), alder (*Alnus*), and cottonwood (*Populus*). Since the 19th century, much of the valley has been converted to agricultural use, which has severely impacted the historical conditions. Less than one percent of the historical Willamette prairie remains.

The Willamette Valley ecoregion contains the fluvial terraces and floodplains of the Willamette River system, scattered hills, buttes, and adjacent foothills. It is distinguished from the neighboring Coast Range, Cascades, and Klamath Mountains ecoregions by lower precipitation, lower elevation, and a unique mosaic of flora and fauna. Mean annual rainfall is 37 to 60 inches, and summers are generally dry. The Willamette River and its many tributaries throughout the basin provide important spawning and rearing habitat for a number of fish species, including numerous species of ESA-listed anadromous salmonids.

Project actions would take place in ten of the WMAs operated by ODFW in the Willamette Basin. The WMAs and their midpoint coordinates are listed below:

WMA Name	Location (Lat, Long)
Coyote Creek South	44.046667 N 123.255556 W
Coyote Creek Northeast	44.042201 N 123.250734 W
Flight's End	45.78103 N 122.80703 W
Gail Achterman Wildlife Area	44.91956 N 123.11477 W
Herbert Farm and Natural Area	44.520319 N 123.299914 W
Palensky Wildlife Area	45.652300 N 122.843900 W
Big Island	44.059246 N 122.904152 W
Sorenson Meadows	43.98409 N 122.96148 W
South Coyote II	44.03405 N 123.26187 W

WMA Name	Location (Lat, Long)
South Coyote III	44.02471 N 123.25568 W

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: BPA cultural resources staff reviewed routine vegetation management, infrastructure maintenance, and debris removal actions for the various WMAs under a number of National Historic Preservation Act Section 106 consultations (BPA CR Project Nos. OR 2015 032, OR 2015 050, OR 2017 082, OR 2018 109, OR 2020 072, and OR 2021 111). BPA made determinations of no historic properties affected by these actions, subject to conditions detailed below on two of the WMAs. Consulting parties for these consultations included the Oregon State Historic Preservation Office, the Confederated Tribes of Grand Ronde, and the Confederated Tribe of the Siletz Indians. All determinations received concurrences from consulting parties or no responses. A BPA archaeologist reviewed the proposed actions to ensure consistency with these previous consultations (BPA CR Project No. OR 2022 088).

Notes:

- CCNE: Vegetation maintenance would only occur during dry periods when the ground is not saturated to reduce potential soil disturbance.
- SOR: An identified site on the property was surveyed and delineated in 2018 and would be avoided by all project actions using a 30-foot buffer.

2. Geology and Soils

Potential for Significance: No

Explanation: Project actions would have only minor effects on geology and soils. New fence posts to replace broken and fallen fencing would potentially require soil disturbance, but ODFW would seek to reuse existing post holes to the greatest practicable extent and any new holes would only require small, localized disturbances. All road and infrastructure maintenance would be limited to existing disturbed areas. Other actions would not cause any disturbances to geology and soils beyond minor disruption of the topmost layer of soil from movement of people and equipment (ATVs, trucks, etc.).

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

Potential for Significance: No

Explanation: ESA-listed Kincaid's Lupine (*Lupinus sulphureus*) and Nelson's checkermallow (*Sidalcea nelsoniana*) are present at HFNA (U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool). ESA-listed Willamette daisy (*Erigeron decumbens*) has also been documented on multiple WMAs, including critical habitat for Willamette daisy at CCNE and CCS. All WMAs are routinely surveyed by ODFW biologists to document populations of these species, and any present populations are recorded and avoided by project actions. Additionally, ODFW would observe all species-specific conservation measures included in BPA's Habitat Improvement Program programmatic biological opinion (HIP4 BiOp) to reduce the potential for impacts to these listed species. Effects on these species by project actions would therefore be limited and consistent with the not likely to adversely affect determinations in the HIP4 BiOp.

No separately listed Oregon-state listed plant species are present on the WMAs (Oregon Department of Agriculture). ODFW biologists routinely survey WMAs for any listed species, and, were any populations found, would document and avoid the plants.

Non-listed plant species would be impacted by some project actions, such as vegetation management. All vegetation removal would be targeted at non-native, undesirable, and invasive vegetation, which is out-competing native plant species. Vegetation removal would have positive impacts on native vegetation. Other project actions like conducting surveys, infrastructure maintenance, and debris removal would have negligible effects on vegetation.

Notes:

- All herbicide use would conform to the limitations of BPA's HIP4 BiOp (HIP PNF#2024005). Only HIP4 BiOp approved chemicals and methodologies would be used, which would limit applications and minimize herbicide drift and leeching.

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

Potential for Significance: No

Explanation: Habitat for ESA-listed streaked horned lark (*Eremophila alpestris strigata*) is present at CCS, CCNE, CCII, CCIII, and HFNA (IPaC). Streaked horned lark prefer open prairie and sparsely vegetated grassland in the southern Willamette Valley. ODFW biologists routinely survey WMAs for the presence of streaked horned lark and their nests. All nests would be avoided with buffer zones consistent with the HIP4 BiOp. Nesting season for the birds usually runs from May through early August and all project actions would occur only outside of this nesting season to minimize impacts to these birds. Therefore, project actions would not be likely to adversely affect streaked horned lark, consistent with the determination in BPA's HIP4 BiOp.

Additionally, ESA-listed yellow-billed cuckoo (*Coccyzus americanus*) has the potential to be found across many of the WMAs (IPaC). Yellow-billed cuckoo nests are found in riparian forests, which are present at SOR, GAWA, PWA, and FE. A migratory bird, yellow-billed cuckoo typically arrives in the Pacific Northwest to nest in May and departs by the end of August. Project actions would not occur during periods when cuckoos are in the area nor are there any project actions that would substantially affect the heavily-forested areas where cuckoos nest. Project actions would therefore be not likely to adversely affect yellow-billed cuckoo, consistent with the determination in BPA's HIP4 BiOp.

ESA-listed Fender's blue butterfly (*Icaricia icariodes fender*) has been documented at HFNA. Fender's blue butterfly depends on stands of ESA-listed Kincaid's lupine for habitat and forage at various life stages. Populations of Kincaid's lupine on HFNA are under active observation and avoidance for project actions (see: Section 3. Plants above). Because of these avoidance measures, project actions are not likely to affect Fender's blue butterfly, consistent with the determination in BPA's HIP4 BiOp.

Oregon State-listed California brown pelican (*Pelecanus occidentalis californicus*) is very occasionally observed at the PWA and FE WMAs (ODFW Wildlife Division). Pelicans are not a common sight as far inland as the WMAs and have only been documented sporadically in the area. In the unlikely event that there are pelicans present on the WMAs, they would be unlikely to be adversely affected by project actions, none of which are proposed to affect the waterways and beaches on which pelicans typically live.
Non-listed wildlife would be temporarily affected by project actions. Noise from equipment and human presence during project actions would disturb wildlife. These effects would be temporary, consistent with past work on the WMAs, and cause no long-term effects on wildlife. Overall effects on wildlife would therefore be low.

Notes:

- All project actions would conform to the conservation measures contained in BPA's HIP4 BiOp (HIP PNF#2024005), including species-specific conservation measures for streaked horned lark, yellow-billed cuckoo, and Fender's blue butterfly on the appropriate WMAs.

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

Potential for Significance: No

Explanation: ESA-listed bull trout (*Salvelinus confluentus*), Chinook salmon (*Oncorhynchus tshawytscha*), coho salmon (*Oncorhynchus kisutch*), green sturgeon (*Acipenser medirostris*), and steelhead trout (*Oncorhynchus mykiss*) are all regularly present in the Willamette River and many of its tributaries (IPaC, StreamNet Mapper). While many of the WMAs lie alongside or near these rivers, no project actions are proposed that would take place in these water bodies aside from population surveys, which would be visual only. Negative effects on these species would be limited to minor disturbance from human presence and noise. These effects would be temporary and not likely to adversely affect these species, consistent with the determinations in BPA's HIP4 BiOp.

No separately listed Oregon State endangered fish species are present on or near the WMAs (ODFW Wildlife Division).
Non-listed fish present would be affected in a similar manner to the effects described for listed species above.

6. Wetlands

Potential for Significance: No

Explanation: There are mapped wetlands located on many of the WMAs (USFWS National Wetlands Inventory). Project actions would have minimal effects on these wetlands. No fill, excavation, or destruction of wetlands would occur. Effects on wetlands would be limited to the removal of undesirable and invasive vegetation to restore areas for native plants to re-colonize. This would improve the quality of local wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No new wells or groundwater use are proposed. Project actions would have no effect on local water tables.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: No changes to land use are proposed. No changes to ownership or access to the WMAs are proposed. Many of the WMAs are open to public for recreation. Some project actions, such as road maintenance, may require closure of the area to the public during implementation. These closures would be temporary and cause no changes to the long-term use of the WMAs for public recreation.

9. Visual Quality

Potential for Significance: No

Explanation: Vegetation management would remove non-native species to allow for native plants to re-colonize treated areas, restoring the historical visual quality of vegetation on the WMAs.

In-kind repair and maintenance of fences, roads, and infrastructure would not change the visual characteristics of the areas. No other changes to visual quality are proposed.

10. Air Quality

Potential for Significance: No

Explanation: There would be some exhaust generated from equipment and vehicles used for project actions (trucks, ATVs, etc.). These effects would be minor, consistent with past work on these WMAs, and cause no long-term changes to local air quality.

11. Noise

Potential for Significance: No

Explanation: There would be some noise generated from equipment and vehicles used for project actions (trucks, ATVs, etc.). These effects would be minor, consistent with past work on these WMAs, and cause no long-term increases to noise in the local areas.

12. Human Health and Safety

Potential for Significance: No

Explanation: All workers would use best practices to ensure human health and safety.

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: Two of the WMAs – Sorenson Meadows and the Palensky Wildlife Area – are owned by BPA. No further coordination would be required with BPA beyond the annual contracting process. The Herbert Farms Natural Area WMA is owned by the City of Corvallis, Oregon. ODFW owns a conservation easement on the property that covers routine O&M actions and no further external coordination would be required. The remaining seven WMAs are owned by ODFW and would require no external coordination.

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

Signed: */s/ Thomas DeLorenzo* *July 27, 2023*
Thomas DeLorenzo Date
Environmental Protection Specialist