

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Raistakka Building Demolition and Vegetation Management

**Project No.:** 2010-073-00

**Project Manager:** Anne Creason, EWL - 4

**Location:** Wahkiakum County, WA

**Categorical Exclusion Applied (from Subpart D, 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 Columbia Land Trust (CLT) to implement a residential structure removal on CLT-owned land in Wahkiakum County, Washington.

The proposed project would include the complete removal of the two-story house and all associated outbuildings as well as the complete removal of the cinder block structure and associated concrete pads. Miscellaneous debris on the project site would also be removed, including building material in the outbuildings and associated household dumping immediately adjacent to the work area. Demolition would occur over the first two days keeping the project footprint within the upland areas of the site and within the work buffer area. An asbestos survey has already been completed and there is no evidence of any asbestos in the old residence. Following the Southwest Clean Air Agency protocol, at least ten days prior to initiating work, CLT would post the results of the asbestos survey.

The work is anticipated to take six working days. Two large excavators would be used to break apart the house from top to bottom, the excavators would separate and stockpile material to grind it ahead of loading debris into dump trucks to be recycled and disposed of off-site. The excavators would be staged outside of all floodplain areas on the existing road, internal levees, and uplands that are in a ruderal condition surrounding the house. Once the house is demolished the project would proceed to remove the cinderblock structure and associated concrete pads. This approach would allow the contractor to work their way out of the project area. Concrete slabs would be broken apart and loaded into the dump trucks for off-haul.

Additionally, proposed activities include the treatment, using HIP4-approved herbicides, of targeted reed canarygrass but also may include treatment of other noxious weeds such as Japanese knotweed (*Fallopia japonica*), purple loosestrife (*Lythrum salicaria*), and yellowflag iris (*Iris pseudacorus*), among others. An aquatic formulation of glyphosate would be the primary herbicide used for weed control in both the High Marsh Areas and Upland Areas. An imazapyr product, such as Habitat, would be applied in limited quantities at the margins of the high marsh areas to control Japanese knotweed, for which glyphosate is ineffective.

No work would be allowed to occur in the floodplain. As needed, invasive blackberry may be cleared to allow for additional space for piling and equipment maneuverability. Equipment would be power washed ahead of mobilization to minimize invasive species transferred into the site. Equipment fueling and repairs would only be allowed to take place at least 100-feet from open water. A spill kit would be onsite throughout the duration of the work.

**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/ Shawn Skinner  
Shawn Skinner  
Environmental Protection Specialist

Concur:

<u>/s/ Sarah T. Biegel</u>	<u>August 23, 2023</u>
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:** Raistakka Building Demolition and Vegetation Management

## **Project Site Description**

The project site would occur on the CLT-owned Raistakka property; an approximately 23-acre property located within the Grays River's historical floodplain and disconnected from tidal influence by dikes. The property contains former floodplain habitat typically associated with the tidal reach of the Grays River as well as some hydrologically intact scrub-shrub and forested wetland. Infrastructure on the property includes a residential home, a gravel road, above ground utility poles, and a few concrete slabs and relic features associated with a private wood mill and maritime infrastructure.

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

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

Potential for Significance: No

Explanation: BPA made a determination of no historic properties affected on July 17, 2023 (WA 2023 098). BPA consulted with the Washington Department of Archaeology and Historic Preservation, the Cowlitz Indian Tribe, the Confederated Tribes of the Chehalis Reservation, the Confederated Tribes of Grand Ronde, the Confederated Tribes of the Siletz Indians, the Chinook Nation, and the Shoalwater Bay Indian Tribe. BPA did not receive concurrence from any of the consulting parties within 30 days.

Notes:

- In the event any archaeological material is encountered during project activities, work would be stopped immediately and a BPA Archaeologist and Historian would be notified, as well as consulting parties.

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

Potential for Significance: No

Explanation: Heavy equipment that is utilized in the demolition of the property would access the property via already existing travel routes. All debris piling would be contained to the work area and associated buffer and the debris would be hauled off-site to the proper disposal facilities.

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

Potential for Significance: No

Explanation: There are no known Federal/state special-status plant species in the project area. Disturbance of plants in the project area would largely occur to non-native plants. There

would be a long-term benefit by restoring the project area to a more natural condition through the treatment of invasive plants.

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

Potential for Significance: No

Explanation: There are no known Federal/state special status wildlife species in the project area. Minor, short-term disturbance would occur to wildlife species in the area from noise associated with the demolition. The goal of the work is to improve riparian and floodplain habitat for the benefit of terrestrial and aquatic species.

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

Potential for Significance: No

Explanation: The proposed action would not involve any in-water work or impact to water bodies or fish. The herbicide applications do take place in the high marsh, but all estuarine herbicide application conservation measures would be followed. The goal of the work is to improve riparian and floodplain habitat for the benefit of terrestrial and aquatic species. Impacts to ESA-listed species (Chinook, coho, chum, and steelhead) would be covered under BPA's programmatic Habitat Improvement Program (HIP) Biological Opinion with the USFWS and NMFS.

#### **6. Wetlands**

Potential for Significance: No

Explanation: The project would not be changing the hydrology within the project area; only removing non-native vegetation. The wetlands in the project area would be enhanced and restored by this project. Disturbance of the wetlands is for the purpose of removal of invasive plant species. Any potential wetland impacts would be limited and temporary. There would be a long-term benefit by restoring the project area to a more natural condition.

#### **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Herbicide impacts to groundwater and aquifers would be minimized by application according to manufacturer's label and would be limited. 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: With the demolition of the house and its associated structures, the project area would no longer be a residential location and would be converted into wildlife habitat post-demolition, which is consistent with the purpose of the property.

#### **9. Visual Quality**

Potential for Significance: No

Explanation: The proposed activities of structure demolition would not negatively impact the visual quality of the area. Some changes in vegetation and the associated visual quality would

occur in the immediate project area, but the changes would be returning the area to a more natural state and would be consistent with the visual quality of the surrounding area and/or native plant habitat.

## 10. Air Quality

Potential for Significance: No

Explanation: Minor, short-term impact to air quality from vehicle emissions and dust generated by equipment use. Herbicides would be applied as spot treatments by hand-held backpack sprayers with limited or no impact to air quality.

## 11. Noise

Potential for Significance: No

Explanation: Minor, short-term increase in ambient noise during use of vehicles and equipment.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: All applicable safety regulations would be followed during work activities.

### 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 entire project area is owned and managed by CLT. The project would not occur on any land owned by additional landowners.

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

Signed: /s/ Shawn Skinner August 23, 2023  
Shawn Skinner Date  
Environmental Protection Specialist