

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Asotin Creek Wildlife Area Operations and Maintenance

**Project No.:** 2006-005-00

**Project Manager:** Tracy Hauser, EWL-4

**Location:** Asotin and Garfield counties, Washington

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.3 Routine maintenance, B1.11 Fencing, B1.15 Support buildings, B1.20 Protection of cultural resources, fish and wildlife habitat, B3.1 Site characterization and environmental monitoring.

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to fund the Washington Department of Fish and Wildlife (WDFW) for continued annual operations and maintenance of the Asotin Creek Wildlife Area. The goals of the proposed actions are to “protect, manage, and restore” habitat values for wildlife.

Work would take place in two units of the wildlife area - a lower unit centered around George Creek and an upper unit centered around the north and south forks of Asotin Creek. Work would be focused on approximately 5,600 acres in the lower unit and 5,500 acres in the upper unit. Proposed actions would support ongoing, routine operations and maintenance to reduce noxious weed populations, rehabilitate riparian zones, provide a wildlife food source, and maintain facilities.

Proposed actions include:

- Boundary fence routine maintenance: Fencing has been installed to prevent livestock from entering the wildlife area from adjacent private and USFS properties. WDFW would repair downed sections of fence, tie together broken wires, replace rusty and defective barbed wire, repair rotting or damaged rock jacks, and replace damaged posts. No new ground disturbing activities, including installing new gates, fencing, or signs would occur.
- Noxious weed control: WDFW would use mechanical methods and herbicides to control noxious weeds in the wildlife area with focus on areas that have critical wildlife habitat or sensitive plant communities, that have been previously seeded with native plants, that have desirable riparian cover, along trails/access sites/roads, around structures to create defensible space for fire protection, and along boundaries with other property owners. Mechanical control would be through mowing. Herbicides would be applied with backpack sprayers, ATV-mounted sprayers, tractor-pulled boom sprayers, or pickup-mounted sprayers. Herbicides would be applied as spot treatments in upland or riparian areas, in upland areas up to one acre in size each, on existing agricultural fields up to 30 acres in size each, and along trails and roads.

- Other vegetation control: WDFW may conduct controlled burns if needed for vegetation control on agricultural fields that are plowed and seeded annually. Burning would be conducted during early spring months and only on agricultural fields where excessive straw and leftover crop residue would be a hinderance to seeding. Burning would be completed using propane torches mounted on ATVs. Any area to be burned would have a plowed line around it to provide a fire break to limit spread into desirable vegetation.
- Develop upland wildlife habitat: Work would focus on supporting desirable habitat and providing food sources.
  - Several small, agricultural fields in the upper unit have been seeded annually to produce crops used as a food source and attractant for elk. The goal is for the crops to keep elk on WDFW lands and limit damage to crops on adjacent properties. WDFW would continue seeding these established fields in the fall and spring, using a tractor and plow, with winter wheat, oats, canola, and spring wheat. Remaining fields would be fallowed each summer to control weed species and preserve soil moisture.
  - WDFW would continue work that began in 2011 to thin a stand of young ponderosa pine trees on Smoothing Iron Ridge and clean up from fire damage in 2021. The work would be completed using chainsaws. Stumps would not be removed. Tree debris would be left on the ground to rot naturally.
  - WDFW has seeded hundreds of acres in the wildlife area with native grasses. They would re-seed areas that have not survived for a variety of reasons, including fire damage.
- Monitor status of Spalding's catchfly, an ESA-listed plant species: Monitoring of Spalding's catchfly in the wildlife area would occur annually. WDFW would follow survey protocols approved by the U.S. Fish and Wildlife Service to document the presence/location of the plants. There would be no collection or disturbance of plants. Data would be used to help inform vegetation management of the property.
- Facility maintenance: WDFW would continue ongoing, routine maintenance on existing facilities, including previously installed water systems, in the wildlife area to ensure proper function and safety. Plumbing routine maintenance would ensure that water systems do not have leaks, blockages from rodents are cleared, and pumps are operating at full capacity. Plumbing maintenance is critical for fire protection and wildlife watering stations. Observational quality control of buildings would occur to repair damage from the natural elements or the public that would result in health and human safety issues on the grounds (*i.e.*, graffiti, break-ins, downed limbs or trees). Routine equipment inspection and maintenance would occur inside buildings and adjacent driveways to ensure buildings are safe for staff and equipment is operational and functional. No new ground disturbing activities, including installing new water systems or structures, and no renovations to buildings, barns, or houses would occur as part of the routine maintenance.

These actions would 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. 839 *et seq.*).

**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; 89 FR 34074, April 30, 2024), 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.<sup>1</sup>

Jacquelyn Schei  
Environmental Protection Specialist

Concur:

Katey C. Grange  
NEPA Compliance Officer

Attachment(s): Environmental Checklist

---

<sup>1</sup> BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*

# **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:** Asotin Creek Wildlife Area Operations and Maintenance

## **Project Site Description**

Asotin Creek Wildlife Area is located mainly in Asotin County and partially in Garfield County and covers approximately 36,500 acres. Project sites are all in Asotin County and on land managed by WDFW. The wildlife area is comprised of steep canyons with riparian habitat in the canyon bottoms and shrub-steppe, grasslands, and dry coniferous forest habitats, interspersed with retired farmland parcels and active agricultural lands. Timbered north-facing slopes are common, while south-facing slopes are usually a shrub/steppe habitat type. The wildlife area supports fish, wildlife, and recreational (e.g., hiking, horseback riding, hunting) opportunities. The forks and tributaries of Asotin Creek and George Creek run through the wildlife area, and are considered critical watersheds for steelhead, bull trout, and spring Chinook salmon.

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

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

Potential for Significance: No with Conditions

Explanation: BPA conducted a cultural resources file search utilizing information provided from the Washington Department of Archaeology and Historic Preservation (DAHP). According to DAHP records, there have been no previously recorded sites within the vicinity of the project area. Two previous archaeological inventory efforts have been conducted in the vicinity – one for BPA-funded wildlife and livestock water developments (Cannell 2007, NADB 1349553), and one for BPA-funded O&M actions related to terrace removal and guzzler installation (Yorck 2014; NADB 1685589).

As a result, the BPA archaeologist determined that the use of a tractor and plow to seed an existing field in a manner that is consistent with recent and historic use of the area, and where ground disturbance is limited to the existing plow zone, would have no potential to cause effects to historic properties.

All routine building and fence maintenance activities are non-ground disturbing and would retain the existing structure, with no modifications, additions, or removals of structures or structural elements that might affect potential eligibility for inclusion in the National Register of Historic Places. In addition, noxious weed control, tree thinning with no stump removal, and monitoring for presence of ESA-listed plant species are non-ground disturbing activities and would not require the use of heavy equipment.

BPA conducted a Section 106 consultation with DAHP, the Nez Perce Tribe (NPT), Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Colville Nation (Colville), and the Confederated Tribes of the Umatilla Indian Reservation on controlled burning activities. On May 13, 2025, BPA made a determination of no historic properties affected. Questions were received from WDFW and the NPT in response to the letter. On May 15, 2025, an updated letter was sent to all consulting parties with clarifications and the same determination of no historic properties affected. On May 15, 2025, DAHP and the Colville provided concurrence with BPA's finding. The NPT

acknowledged receipt of the updated letter on the same date. No other comments were received within the 30-day consultation period.

Notes:

- Should project activities change, debris be removed from plowed fields, or should BPA provide funding for new ground disturbing or restoration activities, then further review under Section 106 and field inventory would be necessary.
- In the unlikely event that cultural material is encountered during the implementation of this project, BPA requires that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA and in consultation with the appropriate consulting parties.

## **2. Geology and Soils**

Potential for Significance: No

Explanation: The proposed action of plowing/seeding crops would involve disturbance of soils, but soils would not migrate beyond the existing agricultural field/plow zone. No other ground-disturbing activities are proposed and, thus, the other proposed activities would not have the potential to affect geology and soils.

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

Potential for Significance: No

Explanation: The Spalding's catchfly (*Silene spaldingii*), ESA-listed as Threatened, is found in the Asotin Creek Wildlife Area. However, WDFW monitors the plant annually and has data on locations. Proposed project locations are not near known occurrences of Spalding's catchfly and possible impacts from proposed actions would be minimized by adherence to conservation measures in BPA's Habitat Improvement Program (HIP) Biological Opinions (BiOps) under Section 7 of the ESA. Effects would, therefore, be minor and consistent with the not likely to adversely affect determination of the HIP BiOp.

There are no state special-status plant species documented in the project area. Minor and temporary vegetation disturbances would occur as part of the proposed actions but would have short-term effects on vegetation. In the long term, proposed actions would result in an improvement in the vegetative condition of the wildlife area.

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

Potential for Significance: No

Explanation: The yellow-billed cuckoo (*Coccyzus americanus*), ESA-listed as Threatened, has the potential to be in the project area; however, there is no designated critical habitat and no known occurrences of the species in the project area. Therefore, the project would have no impact to the species. The monarch butterfly (*Danaus plexippus*), an ESA Candidate species, also has the potential to be present in the project area. Project activities may have minor and temporary effects to monarchs due to possible deterrence from crew presence. Areas where proposed actions would take place (herbicide application, agricultural seeding, fence maintenance) do not contain the plants that are critical for monarchs, so it is unlikely these actions would have impacts. The gray wolf (*Canis lupus*) is classified as endangered by Washington. WDFW has data on wolf pack territories, two of which have boundaries that extend close to the project sites in the lower unit of the wildlife area. If wolves were present in project areas, they would typically leave upon learning of human presence. Therefore, proposed actions would have minor and temporary effects to wolves and impacts would be removed once proposed actions were completed and crews left the area.

There would be temporary disturbances to non-listed wildlife, due to crew presence, plowing of agricultural fields, herbicide application, and controlled burning; however, effects would be temporary and localized. Equipment use would be avoided during nesting and breeding seasons where nesting birds may be present to minimize effects. Work would avoid eagle nesting areas, which typically are in extremely rugged areas and located on rocky cliffs. Herbicide application would be conducted by a licensed applicator, application method would be appropriate to the coverage needed, and drift would be minimized by not spraying during high winds, precipitation events, or high temperatures. No habitats would be modified to any degree that might permanently displace resident wildlife, though some may be temporarily displaced by disturbance from proposed actions and human presence.

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

Potential for Significance: No

Explanation: The tributaries of Asotin Creek and George Creek run through the wildlife area and are considered critical watersheds for federally-listed steelhead (*Oncorhynchus mykiss*), Chinook salmon (*Oncorhynchus tshawytscha*), and bull trout (*Salvelinus confluentus*). The proposed activities would not involve any in-water work. Possible impacts from herbicide use in areas that may be closer than 300 feet to streams would be minimized by following the conservation measures listed in BPA's HIP BiOps such that there would be no adverse impacts to water bodies, floodplains, or fish.

## **6. Wetlands**

Potential for Significance: No

Explanation: There are wetlands identified along Asotin Creek in the wildlife area (USFWS National Wetlands Inventory), but there are no wetlands in the upland areas where project activities would occur, so there would be no impacts to wetlands.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Herbicides would be applied in compliance with BPA's HIP BiOps, which would minimize any possible impacts to groundwater.

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

Potential for Significance: No

Explanation: There would be no change to land use and no impact to specially-designated areas. WDFW manages the land where the proposed projects would take place. Opportunities for public recreational use would continue to be available for the property. Sign-in kiosks are posted at all property access points and project activities would be conveyed prior to starting work.

## **9. Visual Quality**

Potential for Significance: No

Explanation: Maintenance and repairs on existing structures would improve their appearance. Vegetation management would return the area to a more natural vegetative state that would improve the visual quality.

## 10. Air Quality

Potential for Significance: No

Explanation: There would be short-term effects from use of vehicles and equipment generating exhaust and dust. The emissions would be of short duration and consistent in amount and duration with routine vehicle and equipment use currently at the facility. There would be short-term effects from smoke present during controlled burns. Burning would take place over a short duration (a few hours) and smoke would dissipate once leftover crop residue was burned. WDFW would comply with Washington outdoor burning laws and acquire any necessary state or local burn permits. There would be no long-term effects to air quality.

## 11. Noise

Potential for Significance: No

Explanation: Noise from vehicles and equipment is anticipated. The noise would be of short duration and consistent in volume or duration with routine activities in the wildlife area and surrounding properties. This noise would be temporary and cause no long-term impacts.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: Wildlife Area staff regularly attend herbicide/pesticide certification workshops to keep their Washington State Public Operator spraying licenses up to date. All staff would use best management practices to protect worker health and safety. For proposed controlled burns, WDFW would comply with Washington outdoor burning laws and acquire any necessary state or local burn permits. Staff would be trained on proper use of propane torches and wear appropriate protective gear while conducting the burns. A plow line would be established around the perimeter of the field (within the established plowed area) before burning was initiated to create a fire break. Crews would ensure all fires were extinguished before leaving the area. Equipment may use hazardous materials; these materials would be disposed of off-site according to all local, state, and federal regulations. No impacts to human health and safety are expected as a result of project 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: WDFW manages the Asotin Creek Wildlife Area and all project activities would occur on WDFW-managed land.

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