Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Upper Cottonwood Creek Restoration Phase 2

Project No.: 2007-397-00

Project Manager: Chad Baumler, EWL-4

Location: Grant 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 Warm Springs Reservation of Oregon (CTWS) to implement a low-tech processed-based restoration (LTPBR) project in Grant County, Oregon. Monument Soil and Water Conservation District is a project partner. The U.S. Fish and Wildlife Service (USFWS) is providing technical assistance for the project through its Partners for Fish and Wildlife Program. The project would occur on private land along Cottonwood Creek, which is a tributary of the North Fork John Day River. Cottonwood Creek provides spawning and rearing habitat and is designated critical habitat for Endangered Species Act (ESA)-listed Middle Columbia River (MCR) steelhead trout (*Oncorhynchus mykiss*).

The proposed project would install approximately 73 beaver dam analogs (BDAs), place large woody debris (LWD) features at approximately 38 locations, and install approximately three LWD jams over approximately 2.6 miles of Cottonwood Creek. The BDAs would span the creek channel and would be constructed of untreated wooden spikes driven vertically into the creek with willow, juniper, or pine tree material woven between them to simulate a beaver dam. LWD placements would be one- to two-log structures placed along and across the channel, secured with driven 4.5-inch diameter posts crossed at an angle to prevent floating. LWD jams would consist of four to five trees placed together and pinned with wooden posts, with rootwads facing upstream.

Trees for the LWD features would be harvested on-site by thinning upland areas near the creek over a total of approximately 59 acres. An excavator would be used to push over trees harvested for the LWD features so that the root wads can be used. Additionally, juniper thinning within a separate approximately 52-acre area upland area on the same property would occur as part of Phase 2 restoration activities. Juniper trees would be machine cut, piled, and left in place as part of this project.

An excavator operated from outside of the creek would be used to place LWD in the stream and drive posts for the LWD and BDAs. Vegetation woven between the BDA posts would be installed by hand. Additional support equipment used for construction may include pickup trucks and all-terrain vehicles (ATVs)/utility task vehicles (UTVs). Existing unpaved roads provide access to project work areas, and no new road construction would be required for implementation.

The project is intended to improve natural stream and riparian processes by promoting LWD retention, slowing high flows, and increasing the stream's connection with the floodplain. The increased physical complexity within the channel is intended to benefit MCR steelhead and their habitat.

The proposed action would support conservation of ESA-listed species considered in the 2020 ESA consultation with the National Marine Fisheries Service (NMFS) on the operation and maintenance of the Columbia River system. It would also support ongoing efforts to mitigate for the effects of the Federal Columbia River Power System on fish and wildlife 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.

JOHN VLASTELICIA

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John Vlastelicia
Environmental Protection Specialist

Concur:

KATEY GRANGE

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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: Upper Cottonwood Creek Restoration Phase 2

Project Site Description

The project site is located approximately 14 miles south of the town of Monument in northwestern Grant County, Oregon. The project property is a privately owned ranch, portions of which are used for livestock grazing. The project area encompasses approximately 2.6 miles of Cottonwood Creek in two segments that are separated by a one-mile gap where the creek crosses a property under different ownership. Riparian vegetation along the creek includes some alder and willow trees. Surrounding upland areas include a mix of grassy and forested hillsides that include the adjacent tree harvest and juniper thinning areas that are part of the Phase 2 restoration project. An unpaved road network is present in the project area, providing access to the proposed BDA and LWD installation points. Instream restoration activities completed along Cottonwood Creek in 2025 for Phase 1 of the project are located just upstream of the Phase 2 project area.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: BPA and U.S. Fish and Wildlife Service (USFWS) agreed that USFWS, which is providing technical assistance for the project through its Partners for Fish and Wildlife Program, would take the role of lead federal agency for compliance with Section 106 of the National Historic Preservation Act (NHPA). On August 5, 2025, USFWS initiated consultation with the Oregon State Historic Preservation Office (SHPO), CTWS, Burns-Paiute Tribe, and Confederated Tribes of the Umatilla Indian Reservation. USFWS continued consultation with submission of an archeological survey report that identified one archaeological site and a letter presenting a “no adverse effects” to historic properties determination, provided that the condition noted below is met. SHPO concurred with the determination on January 29, 2026 (SHPO Case No. 25-2132), and no other responses from consulting parties were received during the comment period.

Notes:

- Newly delineated site boundaries are to be avoided. If ground disturbing activities must take place within the archaeological site boundaries, a mitigation plan and data recovery would be required in consultation with the USFWS, SHPO, and affected Tribes.

2. Geology and Soils

Potential for Significance: No

Explanation: There would be temporary soil disturbance from tree felling, hauling trees to the stream for use as LWD, and piling cut juniper on the site. Installation of BDAs and LWD features would involve limited sediment disturbance from post driving and wood placement in the stream, and small areas of soil disturbance and compaction could be expected at each of these features from an excavator accessing the stream from the nearby road. The existing ranch road’s close proximity to the work areas would limit the amount of off-road access disturbance needed, and stream access points would be selected to minimize soil disturbance.

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

Potential for Significance: No

Explanation: Trees with rootwads would be harvested by thinning forested upland areas near the creek, close to the stream restoration elements. Tree thinning would occur in three separate areas totaling approximately 59 acres. Trees targeted for use in the stream restoration would be mostly pine and fir. Juniper thinning by cutting (stumps left in place) would also occur on a separate approximately 52-acre portion of the property. Small areas of riparian vegetation could also be disturbed by equipment accessing each of the BDA and LWD installation sites from the nearby ranch road. Specific creek access points would be selected to minimize damage to riparian plants. The site is not within the geographic range of any federal ESA-listed plant species, and there are no documented occurrences of state-listed plants in the project area.

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

Potential for Significance: No

Explanation: Wildlife including deer, elk, coyote, various small mammals, birds, reptiles, and amphibians may use the project area. Construction activity could temporarily deter wildlife from using the area, due to noise, visual disturbance, and physical disturbance from equipment operation and human activity. Some small animals (e.g., mice, gophers) could be killed by equipment operation. Additionally, pine, fir, and juniper trees provide habitat structure for birds and small mammals; that type of structure would be reduced with the trees removed. Habitat would not be modified to a degree that would permanently displace medium to large resident wildlife.

Bird nesting surveys would be performed prior to tree removal within the primary nesting season for migratory birds (April 15 – July 31), if tree removal during this period is required. Removal of trees with observed nests would be avoided until after the nesting season has ended and nests are no longer occupied. No migratory birds of conservation concern have been documented in the project area, based on USFWS Information for Planning and Conservation records.

The project site is within the geographic range of the ESA-listed Endangered gray wolf (*Canis lupus*). However, the project site is not within an area of documented gray wolf occurrences; is not within a known or estimated gray wolf use area, as identified by the Oregon Department of Fish and Wildlife (ODFW); and is not within designated critical habitat for gray wolf. The project would have no effect on gray wolf. There are no documented occurrences of state-listed wildlife species in the project area.

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

Potential for Significance: No

Explanation: Cottonwood Creek is designated critical habitat for ESA-listed Threatened MCR steelhead trout. It is also habitat for redband trout.

The BDAs and LWD features would involve low-level temporary disturbance in Cottonwood Creek during installation. Fish present in areas of wood installation, including MCR steelhead, could be displaced from those sections of creek while in-water work is occurring. The project would not involve dewatering the stream or fish capture; instead, flow in the perennial creek would be maintained through the work areas in order to allow ESA-listed MCR steelhead and other fish present to remain in the stream and move upstream or downstream away from active BDA/LWD installation areas.

In-stream restoration activities would be completed during the July 15th to September 30th in-water work window recommended by ODFW for Cottonwood Creek to minimize impacts to fish, and construction best management practices including keeping equipment staging and fueling areas at least 150 feet from the creek would be used to minimize the potential for water quality impacts. In-water construction would be performed under a Nationwide

Permit No. 27 (Aquatic Habitat Restoration) issued by the U.S. Army Corps of Engineers, in compliance with federal Clean Water Act Section 404 permitting requirements.

Installation of habitat-forming in-stream structures is authorized under the NMFS Biological Opinion issued for BPA's Habitat Improvement Program (HIP). While the project may affect, and is likely to adversely affect, ESA-listed MCR steelhead due to short-term construction-related effects from in-water work, the overall impacts would be beneficial to steelhead and other aquatic species. By slowing the flow of water, providing in-stream structure, and improving the stream/floodplain connection, the proposed BDAs and LWD features would improve and expand habitat for fish and other aquatic species.

6. Wetlands

Potential for Significance: No

Explanation: The installation of the BDA and LWD features would involve temporary disturbance within the wetted perimeter of Cottonwood Creek, but no excavation or fill is proposed that would result in any permanent wetland loss or degradation. By improving the stream/floodplain connection, the project would enhance and potentially expand the wetland riparian area over time. National Wetland Inventory mapping identifies no wetlands within the proposed tree removal areas.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Project activities would not involve groundwater withdrawals or discharges to groundwater. The BDAs are intended to improve the stream/floodplain connection and thus could result in improvements to groundwater recharge in the floodplain. Juniper trees uptake a considerable amount of water from the soil (more than native bunch grasses), and reducing the number of juniper trees may result in some increase in water available for groundwater recharge in the project area.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The project would not change the existing ranch land use of the site or surrounding area, and the site is not within any specially designated area that would prohibit the proposed activities.

9. Visual Quality

Potential for Significance: No

Explanation: The project would alter visual conditions of the site by reducing tree coverage in the areas where tree removal is proposed. The post-harvest landscape would remain generally consistent with the overall ranch property setting, which includes a mix of grasslands with scattered trees and forested areas of varying densities. The BDAs and LWD features would mimic beaver activity and natural conditions, and both would increase floodplain activation and the wetted width of Cottonwood Creek, potentially adding some diversity of vegetation color and texture to the landscape. The project is on privately owned land, far from publicly traveled roads and public viewpoints.

10. Air Quality

Potential for Significance: No

Explanation: The project would not introduce new operational sources of air emissions or otherwise affect air quality in the long term. Minor temporary increases in site emissions from gasoline and/or diesel-powered equipment and vehicles would occur during tree removal and BDA/LWD installation. Dust emissions would be minor based on the limited ground disturbance and the fact that the BDAs and LWD would be installed within the creek. The

project site is not located in an area designated by the Oregon Department of Environmental Quality as a Non-Attainment or Maintenance Area with current or historic issues meeting air quality standards.

11. Noise

Potential for Significance: No

Explanation: The project would not introduce new permanent sources of noise and would not otherwise change noise levels in the area in the long term. Tree harvest and BDA/LWD installation would temporarily elevate noise above background levels while work is occurring. Noise-generating equipment could include an excavator, saws, pickup trucks, and ATVs/UTVs. Noise-generating activities would occur on a large private ranch property in a rural area. There are no nearby sensitive noise receptors such as residential neighborhoods, schools, or hospitals.

12. Human Health and Safety

Potential for Significance: No

Explanation: No permanent public health or safety hazards would be created by the tree removal activities or installation of the BDAs or LWD features. Temporary safety hazards typical of construction activities would be expected from the operation of equipment and hand tools on the project site.

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 landowner of the project area is aware of the project and has been involved in pre-project coordination with Monument Soil and Water Conservation District. Construction activities and schedule would be coordinated with the landowner prior to on-the-ground work.

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

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