

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Operations and Maintenance at Shillapoo Wildlife Area

**Project No.:** 2003-012-00

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

**Location:** Clark County, Washington

**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; B3.1 Site Characterization and Environmental Monitoring.

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to fund the continued operations and maintenance (O&M) of Shillapoo Wildlife Area (Shillapoo WA) managed by the Washington Department of Fish and Wildlife (WDFW) as part of the Northwest Power and Conservation Council's (NPCC) Provincial/Sub-Basin Planning Process. This project is located in the Lower Columbia Province (Lake River Sub-Basin) and the proposed activities would address wildlife losses due to adverse impacts caused by construction of Bonneville, the Dalles and John Day Dams.

Ongoing maintenance and enhancement work would include restoration of approximately 650 acres of wetland plant communities within the drained Shillapoo Lakebed and management, enhancement, and maintenance of other smaller wetland areas throughout Shillapoo WA. Activities would include:

## **Fence Maintenance**

All fences at the management area would be monitored and maintained. Work would include tightening wires, replacing old or broken wires with new ones, replacing broken posts (both metal t-posts and 4x6 wood posts), and removing fallen trees or branches from fencelines.

## **Produce Inventory or Assessment**

WDFW proposes to conduct vegetative surveys to assess the prevalence of weeds in open pasture areas and grassland on Shillapoo WA. They would also conduct wetland vegetation surveys to monitor changes in plant communities over time. These surveys would provide data to determine the effectiveness of weed treatments and enhancement activities.

WDFW proposes to conduct waterfowl surveys to detect changes in waterfowl use patterns resulting from enhancements that have occurred over the past several years. This effort would evaluate the effectiveness of implemented enhancement projects as measured by the use of specific targeted waterfowl species. Data gathered would be used to assess the habitat management techniques and determine success of restoration, enhancement, and land management.

WDFW proposes to conduct snag prevalence surveys in forested areas. Surveys would be conducted via belt transects to record and calculate the number of snags per acre. Areas with low snag densities would have snags created or nest boxes placed in the areas with low densities.

## **Vegetation Maintenance**

Vegetation would be monitored, planted, maintained, or removed using physical, mechanical, cultural, or chemical means. See below for details.

### *Plant Vegetation*

WDFW proposes to rehabilitate or overseed up to 35 acres of upland pastures annually. The planting of cover crops would be implemented one or two years in advance of replanting the pastures to reduce the density of weeds and herbicide use, improve the soil conditions, and ensure greater success of the pasture seed establishment. Seeding would occur through broadcast spraying or full rehabilitation including tilling soil prior to plantings. These actions would improve pasture conditions for Canada geese foraging habitat and would inhibit the germination of noxious weeds, including reed canary grass (*Phalaris arundinacea*).

WDFW proposes continued planting and maintenance of trees on approximately 200 acres of riparian areas and upland habitat. Species would include Oregon white oak (*Quercus garryana*), Oregon ash (*Fraxinus latifolia*), red elderberry (*Sambucua racemosa*), blue elderberry (*Sambucus cerulea*), black hawthorn (*Crataegus douglasii*), serviceberry (*Amelanchier alnifolia*), Pacific crabapple (*Malus fusca*), black cottonwood (*Populus balsamifera*), red-osier dogwood (*Cornus sericea*), wild rose (*Rosa spp.*), snowberry (*Symphoricarpos albus*), Douglas spirea (*Spirea douglasii*), and willow (*Slix spp.*). Planting locations would include the North Unit (old agriculture site), South Unit (old rookery site and Buckmire Slough), Lake River riparian zone, and the Chapman Slough. Plantings would be completed by hand and occur in February. All of the trees and shrubs that would be planted would also have wildlife browsing protection and weed mats placed around them to increase survival rates.

### *Remove vegetation*

WDFW proposes to continue wetland enhancement through the removal of 30 to 60 acres of reed canary grass through annual disking and herbicide treatment. Selected wetland and slough areas would be treated during the fall, when they are dry, to control reed canary grass. These areas would then be inundated with water during winter months, and, if needed, wetlands would be disked and planted with a cover crop in the spring. Disking would release the natural seed bank then cover crops would be planted. These treatments would continue as necessary, approximately every 3 to 5 years, to maintain desirable plant species.

WDFW proposes to control a minimum of 200 acres of Canada thistle (*Cirsium arvense*) and other broadleaf weeds annually through mowing and use of herbicides; control a 50 acre area of Himalayan blackberry (*Rubus armeniacus*) through mowing, herbicide application, and burning; control an estimated 300 acres of purple loosestrife (*Lythrum salicaria*) through cutting, pulling, and spot spraying; and control of other invasive species such as English ivy (*Hedera helix*) and Meadow knapweed (*Centaurea pratensis*).

WDFW proposes to create goose forage habitat by mowing and prescribe burning pastures to reduce vegetation height and facilitate regrowth and a condition reflecting optimum habitat value. This would occur in areas that are not already included in grazing leases where the lessee would be required to complete mowing activities. Other forage management would include harrowing, and liming or fertilizing of pastures to help cover crops complete with reed canary grass.

## **Boulder Placement**

WDFW proposes to place boulders across an existing access route to Vancouver Lake. The path down to the lake is connected off of an existing parking lot. The proposed actions would prevent the public from driving down to the edge of the lake and would prevent an unintended route of travel to be formed. Boulders would be placed using heavy equipment along already existing access routes.

Funding the proposed activities would support Bonneville's ongoing efforts to mitigate for effects of the FCRPS 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), 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/ Catherine Clark

Catherine Clark  
Contract Environmental Protection Specialist  
Motus Recruiting and Staffing, Inc.

Reviewed by: Chad Hamel

/s/ Chad Hamel

Chad Hamel  
Supervisory Environmental Protection Specialist

Concur:

/s/ Katey C. Grange

Katey C. Grange  
NEPA Compliance Officer

May 24, 2021

Date

# 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:** Operations and Maintenance at Shillapoo Wildlife Area

## **Project Site Description**

Shillapoo Wildlife Area is approximately 2,430 acres and located within the floodplain of the Columbia River in Clark County, Washington. The wildlife area is a mix of agricultural land and developed pasture intermixed with fragmented pieces of natural habitat.

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

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

Potential for Significance: No

**Explanation:** A BPA Archeologist conducted National Historic Preservation Act Section 106 consultations with Washington State Department of Archeology and Historic Presentation (WA DAHP), Chinook Indian Nation, the Confederated Tribes of Grand Ronde, Confederated Tribes of Siletz Indians of Oregon, Cowlitz Indian Tribe, Confederated Tribes of the Warm Springs Reservation of Oregon (CTWSRO), and Confederated Tribes and Bands of the Yakama Nation. BPA surveyed the boulder placement pre-implementation and would survey the other activities after the action had occurred due to lack of ground surface visibility, thick vegetation and/or seasonal inundation. BPA determined that the implementation would result in no historic properties affected (WA 2020 224). DAHP concurred with BPA's initiation on October 23, 2020. CTWSRO concurred with BPA's initiation on November 13, 2020. No comments were received from any of the other consulting parties. DAHP concurred with BPA's determination on March 26, 2021. No comments were received from any of the other consulting parties.

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

Potential for Significance: No

**Explanation:** Heavy equipment that is utilized in the implementation of these activities would be in already disturbed areas or already existing travel routes. All pastures and fields would be planted using farming equipment. No new ground-disturbing activities are proposed outside of the Shillapoo Wildlife Area Management Plan.

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

Potential for Significance: No

**Explanation:** No Federal/state special-status plant species are within the project sites. Herbicide would be used in dry conditions for localized treatment of targeted invasive/non-native plants only; proposed activities would inhibit invasives/non-natives and promote native plant species growth. All Federal/state special-status habitats would be enhanced due to the proposed activities.

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

Potential for Significance: No with Conditions

Explanation: Individual Section 7 consultation for Streaked Horned Lark (SHL) and Columbian White-tailed Deer(CWTD) required for proposed activities 2018-2028. Effect determinations LAA for SHL, and NLAA for CWTD. A Biological Opinion was returned from USFWS (Ref# 01EWF00-2018-F-0357) on June 13, 2019 and the proposed timeframe of this consultation is 10 years or the end of the federal fiscal year 2028. Wildlife may be temporarily displaced during proposed activities due to increased noise and human presence. All activities would occur during daylight hours.

Notes:

- WDFW would implement conservation measures to protect SHL and their habitat as agreed in the BiOp.

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

Potential for Significance: No

Explanation: Listed salmonids found in the Columbia River, Lake River, and Vancouver Lake adjacent to the wildlife area lands include lower Columbia Coho, Chinook salmon, Columbia River Chum salmon, Snake River Sockeye, and steelhead. The proposed actions would not physically alter any aquatic habitat that listed species occupy. Shillapoo North and South Units are closed off from the Columbia River system by levees, therefore the vegetation treatment would not impact listed nor non-listed species. There would be no adverse physical changes to water bodies, floodplains, or fish from the proposed actions.

#### **6. Wetlands**

Potential for Significance: No

Explanation: The wildlife area maintains all wetlands cut off from the river. All activities in the wetland areas would be done while the wetlands are without water to minimize for any negative impacts to the physical land, and no actions proposed would modify wetlands or riparian areas. Some riparian and wetland vegetation may be affected as invasive plants would be treated with herbicides with some small potential for contact with non-target native plants.

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

Potential for Significance: No

Explanation: There would be no groundwater withdrawal. Herbicides would be applied in dry conditions or as spot treatments only, with limited or no potential to reach groundwater if applied according to label instructions (as is required).

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

Potential for Significance: No

Explanation: No action would change the capability of the land to be used as it was prior to proposed actions. There would be no land use changes or disruptions to recreational users, and no impact to specially-designated areas.

## 9. Visual Quality

Potential for Significance: No

Explanation: No prominent vegetative, landform, or structural changes would be made. Proposed boulder placement may be unsightly to some, but the boulder placement to stop vehicular use is a common practice on wildlife areas in Washington state and would prevent off road use that would cause degradation of the visual quality.

## 10. Air Quality

Potential for Significance: No

Explanation: Temporary, small amounts of vehicle emissions would be generated by farm equipment and trucks during implementation.

## 11. Noise

Potential for Significance: No

Explanation: Temporary increase in ambient noise may occur during implementation. Any noise emitted from equipment would be short term and temporary during daylight hours.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: No known soil contamination or hazardous conditions and no adjacent CERCLA sites.

### **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: Washington Department of Fish and Wildlife is the manager of the property being maintained and is responsible for the actions considered in this CX.

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

Signed: /s/ Catherine Clark May 24, 2021  
Catherine Clark – ECF-4 Date  
Contract Environmental Protection Specialist  
Motus Recruiting and Staffing, Inc.