

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** South Fork Clearwater River Pit Tag Arrays, Fence Maintenance, and Invasive Plant Treatment projects

**Project No.:** 1996-077-02 and 2010-003-00

**Project Manager:** Jenny Lord

**Location:** Idaho County, Idaho

**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 Nez Perce Tribe to install two pit tag arrays in the South Fork Clearwater River, maintain livestock exclusion fencing around meadows in the Nez Perce-Clearwater National Forest, and to treat invasive plants on private lands in the Lolo Creek watershed (a subwatershed of the South Fork Clearwater watershed).

### **Pit Tag Arrays**

Two temporary pit tag arrays would be constructed; one above, and another below a natural velocity barrier to Snake River steelhead (*Oncorhynchus mykiss*) movement in the South Fork Clearwater River near Milepost 28 along Idaho State Highway 14. They would be in operation for a minimum of five years.

Site	Latitude	Longitude
Milepost 28	46.803435°	-115.695133°

The pit tag arrays are the equivalent of laying one or two 6-inch diameter plastic pipes perpendicular across the bottom of the river bed. Wires from the array would extend out of the array to a power and data collection box (approximately the size of a microwave oven) on the river bank. The arrays would be installed by hand during low flows; no heavy equipment would be required. The power and control box would be located on the river bank, set atop the ground surface, in a location slightly modified using hand tools to clear brush for box placement if necessary.

### **Fence Maintenance**

Existing fences, constructed between 1998 and 2019 in the Musselshell Meadow and lower Jim Brown Creek areas, would be inspected and maintained. These are constructed of wooden posts and four-strand barbed or smooth wire. Due to heavy snow loads, annual maintenance is required to maintain a properly functioning fence that protects riparian and stream habitat. Approximately 21 miles of fencing would be inspected for loose or weakened posts, and for bent or compromised barbed wire. Approximately 5,000 feet of deteriorated post and wire fencing would be reconstructed. Post replacement would be with metal posts driven into the ground. The approximate center location of the fencing locations is at:

Site	Latitude	Longitude
Musselshell Meadow and Lower Jim brown Creek	46.356534°	-115.742762°

The same type of fence maintenance and repair actions are proposed for fences constructed in 2000 at McComas Meadows (5.2 miles of fencing) and at Mill Creek (7.2 miles of fencing) in the South Fork Clearwater watershed east of Grangeville, Idaho, located at:

Site	Latitude	Longitude
Mill Creek	45.720533	-115.980821
Mill Creek	45.753810	-115.950994
Mill Creek	45.685706	-116.024766
McComas Meadows	45.902851	-115.916319

### Invasive Plant Treatments

Invasive plants would be spot-treated in the late spring and summer by hand-pulling and backpack spraying of herbicides at sites around the following locations:

Latitude	Longitude
46.243715°	-115.819946°
46.279289°	-115.961780°
46.291917°	-115.918246°

These locations represent centers of treatment areas where individual invasive plants or clusters of such plants have been found. No broad-scale application of herbicide is proposed. All herbicide applications would be done in accordance with the conservation measures identified in BPA's Habitat Improvement Program (HIP) Section 7 Endangered Species Act (ESA) consultation.

### **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/ Robert W. Shull

Robert W Shull

Contract Environmental Protection Specialist  
CorSource Technology Group

Reviewed by:

/s/ Chad Hamel

Chad Hamel  
Supervisory Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Date: 07/02/2020

Sarah T. Biegel  
NEPA Compliance Officer

Attachment(s): Environmental Checklist, List of Fish Screen O&M Sites

# 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: South Fork Clearwater River Pit Tag Arrays, Fence Maintenance, and Invasive Plant Treatment projects**

### **Project Site Description**

The temporary Pit Tag Arrays would be installed in and along the South Fork Clearwater River in a narrow forested canyon oriented east to west. The canyon's north-facing slopes are steep and densely-forested; its south-facing slopes are also steep with scattered conifers, open-forests, or barren-rock. Idaho State Highway 14 runs 20 to 40 feet above the river along its right (north) bank. The river banks are rocky and steep with large boulders and shrubs dominating the right bank where the control box would be located. The location of the control box would be set among large rocks or boulders above the high water mark on the steep slope between the river bank and the highway.

The fence maintenance areas are primarily along forest edges around large meadows and riparian zones. In this edge habitat, dense conifer forest and woody shrubs would occupy the upslope areas with grass/forb meadows and riparian woodlands downslope. Fence lines are located in and across all of these habitat types, and in the ecotone where two or more of these come together.

The invasive plants would be treated on private agricultural lands along Lolo Creek and its tributaries in the Lolo Creek Watershed, which is a tributary to the South Fork Clearwater River. The areas of treatment include riparian areas and roadsides in an agricultural and logging-modified landscape historically dominated by an ecotone of conifer forests and Palouse Prairie grasslands. The riparian areas are naturally characterized by riparian woodlands of Douglas-fir (*Pseudotsuga menziesii*), cottonwood (*Populus* spp.), black hawthorn (*Crataegus douglasii*), dogwood (*Cornus stolonifera*), and willows (*Salix* spp.), but treatment sites would be in riparian areas cleared by agricultural practices, grazing, or logging. Roadsides and other cleared areas may contain herbaceous plants, but are more likely to be dominated by the invasive plants to be treated.

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

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

Potential for Significance: No

- A BPA archaeologist has reviewed the proposed action and has determined that it fits under Appendix A of the *Programmatic Agreement among the Bonneville Power Administration (U.S. Department of Energy, the Advisory Council on Historic Preservation, and the State Historic Preservation Office of Idaho Regarding BPA Fish and Wildlife Program Undertakings*. Undertakings described in Appendix A have been determined through consultation between BPA and the Signatory Parties to be the type of activity that does not have the potential to cause effects to historic properties
- Neither herbicide application nor installation of the pit tag arrays would disturb the ground surface.
- Herbicide would be applied by backpack pump sprayer, not motorized equipment.
- The pit tag array control box would sit atop the ground with no hand digging or excavation by heavy equipment required.
- The array itself would be manually placed on the river's bed, below the water's surface.

- Fence maintenance would be almost exclusively wire tightening and replacement. Post replacement needs would be accomplished using metal T-posts driven into the ground, with no digging required.

## **2. Geology and Soils**

Potential for Significance: No

- Weed treatments would occur on sites that have already been disturbed from prior logging, road construction, grazing, or agricultural activities that preceded weed infestation.
- No heavy equipment operations would be used, so there would be no soil displacement, soil mixing, or other mechanical soil disturbance from herbicide application pit tag array installation.
- Herbicide impacts to biological components of soils would be minimized by application according to manufacturer's labels and further minimized by application of Conservation Measures (type of herbicide, timing, amounts/concentrations, location of application, etc.) from BPA's Habitat Improvement Program (HIP) Federal Endangered Species Act (ESA) consultation.
- The control box for the pit tag array would sit atop the ground, or nestled among large rocks, and would require no holes to be dug. There would be no soil disturbance.
- Fence maintenance would be almost exclusively wire tightening and replacement. Post replacement needs would be accomplished using metal T-posts driven into the ground, with no digging required.

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

Potential for Significance: No, with conditions

- Herbicide applications would take place primarily on sites with slopes less than 20% and would apply HIP conservation measures to minimize the potential for drift or runoff to non-target vegetation.
- Though some sites would be in, or near, riparian areas, herbicide application according to label instructions and HIP conservation measures would result in little or no potential for herbicide to reach aquatic vegetation.
- Pit tag array installation may move a few rocks around or cut a few branches from shrubs that may be hindering installation, but no broad-scale shrub or tree removal is proposed or envisioned.
- Fence maintenance and replacement does not disturb plants beyond the minimal trampling by workers.
- No ESA-listed, or "special status," plant species are present in these locations.

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

Potential for Significance: No, with conditions

- No Federal/state special-status wildlife species or habitats are within the project sites.
- The herbicide treatments are small spot treatments of individuals or clusters of target plants that would be highly localized and thus not substantially impact any one animal's home range.
- No plants identified for herbicide treatment are used preferentially for habitat purposes by native species.
- Larger wildlife using nearby habitats may be disturbed and temporarily displaced by noise and human presence during the short-term herbicide application, fence maintenance, and pit tag array installation.

- No habitats would be modified to any degree that might permanently displace any resident wildlife; though some animals may be exposed to applied herbicides through contact with, or ingestion of, treated vegetation.
- All human presence and activity associated with these actions would temporarily disturb and displace nearby wildlife, but long-term displacement resulting in competition for nearby habitats is unlikely.

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

Potential for Significance: No, with conditions

- No action proposed here would physically alter any aquatic habitat site; there would be no adverse physical changes to water bodies, floodplains, or fish from these actions.
- ESA-listed fish species (steelhead and bull trout) and their designated critical habitats are present in the South Fork Clearwater River and Lolo Creek, and in some of their tributaries, but HIP conservation measures would be applied for herbicide applications, minimizing the potential for herbicide to reach aquatic habitats. ESA HIP consultation Project Notification Form 2020082 for these actions was submitted to the U.S. Fish and Wildlife Service and the National Marine Fisheries Service on 6/29/2020.
- The pit tag array sits atop the river bed, placed in locations that have not been shown to provide spawning habitat for spawning salmonids.
- The pit tag array would not hinder fish movement up or downstream.

## **6. Wetlands**

Potential for Significance: No

- HIP conservation measures would preclude the application of herbicides near any wetlands by requiring an adequate buffer.
- There are no wetlands at the proposed locations of the pit tag array installations.
- Fence maintenance workers would likely walk through wetlands during fence inspections and repair, but no other surface disturbance would occur.

## **7. Groundwater and Aquifers**

Potential for Significance: No, with conditions

- There would be no groundwater withdrawal.
- Herbicide impacts to groundwater and aquifers would be minimized by application according to manufacturer's labels and further minimized by application of HIP conservation measures (type, timing, amounts/concentrations, location of application, etc.).
- Pit tag arrays nor the actions associated with their installation have potential to impact groundwater.
- Fence maintenance has no potential to impact groundwater.

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

Potential for Significance: No

- There would be no land use changes, and no impact to specially-designated areas.

- Spot treatment of individual plants or plant clusters using herbicides applied according to manufacturer's labels and under the HIP conservation measures have no potential to alter land uses or impact specially-designated areas.
- No project action would change the capability of the land to be used as it was prior to project actions.

## 9. Visual Quality

Potential for Significance: No

- No visually-prominent vegetative, landform, or structural change would be made.
- The existing condition of weed treatment sites would be varied, as these are small spots where individual plants or clusters of plants have been found. Some sites may be vegetated, some barren; some visible from roads, some not. The killing of these individual plants or small plant clusters may produce unsightly dead plants visible in the foreground in some areas for a season, but would not substantially alter the visual quality.
- The pit tag arrays and their control boxes would not be visible from Idaho State Highway 14. They would be placed far below the road would be dark-colored to minimize visibility so as to not attract attention and potential human disturbance.
- Fence maintenance would change some wooden fence posts to metal fence posts, altering the rustic appearance of old posts; but the presence of metal posts is not inconsistent with fencing throughout the area and surrounding lands, which is predominantly metal post and wire.

## 10. Air Quality

Potential for Significance: No

- Driving of vehicles to access pit tag array, fence maintenance, and weed treatment sites would produce emissions, but the amount would be minimal and short term, and consistent with that produced by local agricultural activities.
- Hand spraying of herbicide produces no elevated spray drift that might be carried by air currents to adversely affect localized short-term air quality.

## 11. Noise

Potential for Significance: No

- The only noise sources would be from humans working on the sites, and the use of vehicles to transport workers, supplies, and equipment to the project sites.
- All noise sources are of low intensity and short-term.

## 12. Human Health and Safety

Potential for Significance: No

- Vehicle operation, working with hand tools, and working in and along rivers have their attendant risks to workers, but there would be no condition created from these actions that would introduce new human health or safety hazards or risk into the environment.
- No condition created by these actions would increase the burden on the local health, safety, and emergency-response infrastructure.
- Neither project actions nor operation of project-associated vehicles on public roads would hinder traffic or access by emergency vehicles.

### **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: NA

### **Landowner Notification, Involvement, or Coordination**

Description:

- Weed treatment sites on private lands were identified in cooperation with the owners of the private lands on which they occur. Weed treatment personnel would notify and acquire landowner permission prior to treatment on their lands.
- The pit tag arrays would be placed in the river on National Forest System Lands. The Nez Perce Tribe (project proponent) is currently working with the Nez Perce-Clearwater National Forest to acquire the special use authorization required for this type of occupancy of these public lands.
- The fence maintenance actions are entirely on National Forest System Land, and Forest Service personnel are aware of the ongoing, annual maintenance actions on these fences.

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

Signed: /s/ Robert W Shull

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CorSource Technology Group

Date: July 1, 2020