

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Burlington Bottoms Wetland (Palensky) Monitoring Tower Land Use Agreement

**Project Manager:** Anne Creason, EWL-4; Heidi Haserot, TERR-3

**Location:** Multnomah County, OR

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.25 Real property transfers for cultural resources protection, habitat preservation, and wildlife management

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to enter into a Land Use Agreement (LUA) with the Lower Columbia Estuary Partnership (LCEP), in partnership with Oregon Health Sciences University (OHSU), to install an atmospheric monitoring tower in Burlington Bottoms Wetlands in Multnomah County, Oregon. The land on which the tower would be placed is owned by BPA and managed by the Oregon Department of Fish and Wildlife (ODFW) as the Palensky Wildlife Area. The objective of the monitoring project that this tower would be part of would be to assess methane emission and carbon sequestration potential of emergent wetlands in the lower Columbia River Estuary. The monitoring project (equipment purchase, monitoring and analysis) would not be funded by BPA.

The tower would be a temporary tripod structure about 3 meters (about 9 feet) tall on which sensors would be mounted to measure atmospheric levels of carbon dioxide, methane, and water vapor from a radius of about 300 meters (about 980 feet) over surrounding plant canopies, water, and soil surfaces. The tower footprint would be less than 2 meters (about 6.5 feet) square and would be set up on the surface of the existing wetland within the reed canarygrass-dominated vegetation zone. No ground-disturbing activities would occur associated with installation of the monitoring equipment. The tower would be set up in March and removed in November each year, with periodic visits during that time for maintenance and data downloads. No permanent structure would be established at the site, and no permanent features would be affected. Site access would be predominantly on foot. If there is a need for vehicles, it would be communicated to ODFW before accessing the site. The agreement would allow the tower to collect data beginning in the spring of 2023, and potentially continue through 2026.

**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/ Carolyn A. Sharp

Carolyn A. Sharp  
Environmental Protection Specialist

Concur:

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Katey C. Grange  
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:** Burlington Bottoms Wetland (Palensky) Monitoring Tower Land Use Agreement

### **Project Site Description**

Located approximately twelve miles northwest of Portland, Oregon, and situated between OR Highway 30 to the west and Multnomah Channel and Sauvie Island to the east, Burlington Bottoms (Palensky) is located on 417 acres of land acquired by BPA in 1991, to contribute to wildlife habitat mitigation and enhancement. The property is made up of wetlands, riparian areas and wet prairie pasture that provides important seasonal and year-round habitat for many species of fish and wildlife, including the bald eagle and western painted turtle. The alteration of the water regimes and effects of long term cattle grazing at Burlington Bottoms in the past 50 years has had a substantial impact on native plant communities and wildlife species, allowing for an invasion of exotic plant species over time and the overall loss of biological diversity in some areas on the site. A management plan guides restoration actions and numerous restoration projects have been implemented in recent decades that help control invasive species and plant native vegetation. The monitoring tower would be placed in the southern portion of the site in a wetland area dominated by reed canary grass.

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

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

Potential for Significance: No

Explanation: This project does not involve ground disturbance of any kind. There is no potential to affect cultural resources.

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

Potential for Significance: No

Explanation: There is no ground disturbance associated with these actions; therefore, no potential to affect geology and soils.

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

Potential for Significance: No

Explanation: The proposed action does not include any vegetation management, ground disturbance, or actions that would impact vegetation. Therefore, there is no potential to affect plant communities.

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

Potential for Significance: No

Explanation: There would be temporary disturbance and displacement of wildlife in the immediate area of the proposed actions due to noise and human presence. However, the actions are short-term (hours) and habitat would not be altered (no ground or vegetation disturbance). There would be no long-term effect on wildlife or their habitat. No ESA-listed or special status wildlife species are present in the project areas.

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

Potential for Significance: No

Explanation: There would be no effect to water bodies, floodplains and fish, including federal and state special-status species. The monitoring equipment is compact and would rest on the ground. There is no in-water equipment or access needed.

## **6. Wetlands**

Potential for Significance: No

Explanation: The project is located within a degraded, reed canary grass dominated, wetland environment. However, the monitoring equipment would sit on the surface of the ground and there would be no wetland disturbance.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: No groundwater withdrawal would occur, and no discharge of pollutants. There would be no effect on groundwater or aquifers.

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

Potential for Significance: No

Explanation: No specially-designated areas are located within the project area; no land use changes are proposed; nor would the proposed project activities change the current land use at this site.

## **9. Visual Quality**

Potential for Significance: No

Explanation: The proposed use would not alter the visual aspect of the site. The monitoring tower is only about 3 meters tall with a footprint of less than 2 meters square. Equipment would be temporary and removed seasonally each year.

## **10. Air Quality**

Potential for Significance: No

Explanation: The proposed project would have no effect on air quality.

## **11. Noise**

Potential for Significance: No

Explanation: The monitoring equipment does not generate any noise. Human activity associated with occasional maintenance and data collection from March – November may cause a temporary increase in the immediate area associated with use of the facility, but would be consistent with existing use of the property.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: Proposed project actions do not adversely impact human health and safety. Operational activities would follow applicable health and safety standards.

### 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: BPA is the landowner and ODFW has land management responsibilities on the site. Both entities have been coordinated with during the preparation of the Land Use Agreement. LCEP would coordinate access for maintenance and data collection with ODFW.

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

Signed: /s/ Carolyn A. Sharp February 8, 2023  
Carolyn A. Sharp, ECF-4 Date  
Environmental Protection Specialist