

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: ODFW Willamette Wildlife Areas O&M 2025-2026

Project No.: 2011-004-00

Project Manager: Virginia Preiss – EWM-4

Location: Multnomah, Polk, Lane, Benton, and Columbia Counties, Oregon

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; B3.3 Research related to the conservation of fish, wildlife, and cultural resources

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to fund the Oregon Department of Fish and Wildlife's (ODFW's) routine operations, maintenance (O&M), and habitat improvement projects on wildlife management areas (WMAs) throughout the Willamette Valley in north-central Oregon. Funding for these projects partially fulfills commitments made by BPA in the 2010 "Willamette River Basin Memorandum of Agreement Regarding Wildlife Habitat Protection and Enhancement between the State of Oregon and the Bonneville Power Administration" and contributes to ongoing efforts to mitigate for the impacts to fish and wildlife from the construction and operation of the Federal flood control and hydroelectric power projects along the Willamette River and its tributaries.

The Willamette Wildlife Mitigation Program (WWMP) oversees annual O&M and habitat restoration projects on more than two dozen WMAs, trust properties, and conservation easements throughout the Willamette River basin. BPA would fund projects proposed on the following of these WWMP WMAs:

| WMA Name | Location (Lat, Long) | County |
|-------------------------------|--------------------------|----------------------|
| Flight's End | 45.78103 N 122.80703 W | Multnomah & Columbia |
| Palensky Wildlife Area | 45.652300 N 122.843900 W | Multnomah |
| Herbert Farm and Natural Area | 44.520319 N 123.299914 W | Benton |
| Gail Achterman Wildlife Area | 44.91956 N 123.11477 W | Polk |
| Sorenson Meadows | 43.98409 N 122.96148 W | Lane |
| Coyote Creek Northeast | 44.042201 N 123.250734 W | Lane |
| Coyote Creek South | 44.046667 N 123.255556 W | Lane |
| South Coyote II | 44.03405 N 123.26187 W | Lane |
| South Coyote III | 44.02471 N 123.25568 W | Lane |

| WMA Name | Location (Lat, Long) | County |
|-----------------|--------------------------|--------|
| South Coyote IV | 44.039626 N 123.247549 W | Lane |
| South Coyote V | 44.034412 N 123.248247 W | Lane |
| South Coyote VI | 44.028877 N 123.247549 W | Lane |
| Big Island | 44.059246 N 122.904152 W | Lane |

The proposed projects would focus on maintaining and improving wildlife habitat across these WMAs. The proposed actions would include:

Vegetation Management

ODFW staff would conduct routine vegetation management programs across all the WMAs. Staff would remove noxious, invasive, and undesirable vegetation to improve conditions for native plant and wildlife species. Vegetation would be removed using a combination of manual (hand pulling, clipping), mechanical (weed whacking, mowing), and chemical (herbicide) methods as appropriate. In addition, annual prescribed burns would be conducted on upland prairie WMAs if conditions permit. A particular focus on many of the WMAs would be given to controlling reed canarygrass (*Phalaris arundinacea*), which has aggressively colonized wet riparian areas throughout much of Oregon, as well as invasive Japanese knotweed (*Reynoutria japonica*).

ODFW staff would also seed and plant native grasses, forbs, and shrubs to improve native vegetation. Areas which are treated for weed removal would be prioritized for re-seeding and planting as soon as possible to prevent recolonization by undesirable plant species. Seed and plant mixes would be selected based on the unique characteristics of each WMA to promote historical habitat conditions on the properties. Small nursery-grown tree saplings up to 8-gallons would also be planted in the winter of 2025 and 2026 on the Palensky Wildlife Area to improve wetlands on the WMA. Newly planted areas would be monitored regularly by staff and further weeded, mulched, and fertilized as needed to ensure optimal conditions for desirable growth.

Wildlife Habitat Improvements

In addition to vegetation planting projects, ODFW staff would conduct small-scale projects to improve conditions for resident and migratory wildlife on WMAs. Proposed projects would include attaching hand-assembled wooden bird boxes to trees and posts to provide nesting locations for avian species and bats, moving logs and rootwads into open areas for use as basking structures for turtles and reptiles, and piling dirt into areas in which pond turtles are known to nest. Staff would work with local volunteers, schools, and nonprofit groups for these projects to provide opportunities for education and entertainment for the public.

Infrastructure Maintenance

ODFW staff would maintain existing roads, fences, parking lots, and other infrastructure on the WMAs. All road and parking lot maintenance would occur solely in existing footprints and consist of routine maintenance actions, such as filling potholes with gravel, clearing ice and snow during winter months, collecting and disposing of trash and debris, and trimming encroaching vegetation. No new roads or parking lots would be constructed.

Staff would also maintain boundary and internal fencing on the WMAs and associated infrastructure like entry gates. Staff would routinely walk fence lines to inspect for damage caused by animals, exposure, or vandalism and would repair any damage with like-for-like fencing.

Barbed wire fencing on the newly acquired Coyote Creek properties would be removed and replaced with wildlife-friendly smooth wire fencing where exclusion fencing is still needed. No fencing in new locations would be constructed. Staff would also maintain existing culverts and water control structures. Staff would routinely clear debris from these structures and inspect them for any damage. Any repairs would be like-for-like and ensure that the infrastructure is functioning properly.

Other assorted infrastructure, such as signs (hunting and trespassing postings, parking notices, etc.), informational kiosks, and public pathways would be cleaned, maintained, and repaired as needed. No new construction is proposed.

Debris Removal

ODFW staff would remove garbage and debris from the WMAs as needed. Natural debris, such as wood and sediment deposited in seasonally active sloughs during high stream flows, would not be moved unless it negatively affects local habitat. Anthropogenic debris like trash from visitors would be collected by staff and disposed of accordingly. Staff would contact waste disposal services and local authorities if any large items (abandoned vehicles, old appliances, etc.) are left on the WMAs for proper investigation and disposal.

Surveys and Monitoring

ODFW staff would conduct both opportunistic and scheduled surveys of fish, wildlife, and plant species across the WMAs. Focus would be on conducting inventories of Endangered Species Act (ESA)-listed and Oregon Conservation Strategy species present on WWMP properties. Trail cameras would additionally be installed to provide around-the-clock monitoring of wildlife. Wildlife monitoring would also be conducted at the locations of past habitat improvement projects, such as the recently constructed frog underpass at the Palensky Wildlife Area, to assess their effectiveness. Additional opportunistic observations of species during other activities would also be recorded. All monitoring and surveys would be visual and involve no direct human interaction with plants and wildlife. Species presence would be compiled into end-of-year reports to track trends and inform future restoration actions on the WMAs.

ODFW staff would also monitor water conditions and fish at the WMAs. Staff would use waders and small boats to conduct resident fish population counts, install temperature and water quality probes, and record conditions in water bodies and streams. Focus would be on monitoring and recording the presence of ESA-listed salmonids, lamprey, and Oregon chub (*Oregonichthys crameri*).

The presence of emerald ash borer (*Agrilus planipennis*) in central Oregon is a rising concern, particularly due to the large number of ash trees which were planted as part of riparian habitat improvement projects in the Willamette Valley. ODFW would monitor stands of ash trees on the WMAs for the effects of ash borer infestations by taking regular visual surveys of the trees to document the effects and inform future remediation strategies.

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.¹

Thomas DeLorenzo
Environmental Policy Analyst

Concur:

Katey C. Grange
NEPA Compliance Officer

Attachment(s): Environmental Checklist

¹ 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.

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Project Site Description

The Willamette Valley is a 150-mile-long valley in north-central Oregon. It is surrounded by mountains on three sides – the Cascade Range to the east, the Oregon Coast Range to the west, and the Calapooya Mountains to the south. The Willamette River flows through the entire length of the valley. Historically, the valley hosted a mosaic of oak forests, prairie savanna, tall grasslands, and groves of Douglas fir (*Pseudotsuga menziesii*). Floodplains of the Willamette River and its numerous tributaries contained extensive wetlands dominated by stands of willow (*Salix*), alder (*Alnus*), and cottonwood (*Populus*) that provided extensive wintering habitat for dozens of species of migratory birds and rich spawning grounds for anadromous fish. Starting in the middle of the 19th century, much of the valley was converted to agricultural use by settlers from the eastern United States, which greatly altered the nature of the area. Less than one percent of the historical extent of the Willamette prairie remains today.

The Willamette Valley ecoregion contains the fluvial terraces and floodplains of the Willamette River system, scattered hills, buttes, and adjacent foothills. It is distinguished from the neighboring Coast Range, Cascades, and Klamath Mountains ecoregions by lower precipitation, lower elevation, and a unique mosaic of flora and fauna. Average annual rainfall is between 37 and 60 inches, falling almost exclusively during the winter and early spring, and summers are generally very dry and warm.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: BPA cultural resources staff reviewed proposed O&M actions on the various WMAs and consulted with the appropriate parties under the National Historic Preservation Act Section 106 process. BPA cultural resources staff made determinations of no potential to affect historic and cultural resources or no historic properties affected for these proposed O&M actions, subject to the two conditions below. BPA cultural resources staff consulted with the appropriate parties for each cultural review, including the Oregon State Historic Preservation Office, the Confederated Tribes of Grand Ronde, and the Confederated Tribe of the Siletz Indians.

Notes:

- On the Coyote Creek Northeast WMA, vegetation maintenance would only occur during dry months (summer and autumn) when the ground is not saturated to reduce the potential for soil disturbance.
- On the Sorenson Meadows WMA, an identified site would be avoided by all proposed actions using a 30-foot buffer.

2. Geology and Soils

Potential for Significance: No

Explanation: The proposed actions would have only minor effects on geology and soils.

Disturbance during road and parking lot maintenance would be limited to existing areas and cause no new ground disturbance. Fencing repair and replacement would likewise be limited to existing locations. Planting would require digging small holes, but these effects would be small and localized and establishing root systems would help improve the long-term quality of local soils. Beyond minor disturbance from the movement of people and equipment around project sites, there would be no other effects on geology and soils.

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

Potential for Significance: No

Explanation: ESA-listed Kincaid's lupine (*Lupinus sulphureus*) and Nelson's checkermallow (*Sidalcea nelsoniana*) are present at the Herbert Farms Natural Area and the Coyote Creek units (U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC)). Critical habitat for ESA-listed Willamette Daisy (*Erigeron decumbens*) is likewise present on the Coyote Creek WMAs. ODFW staff regularly survey WMAs for the presence of listed species and any populations are recorded, monitored, and avoided. The proposed actions would therefore be unlikely to affect ESA-listed plant species, consistent with the determination in BPA's Habitat Improvement Program programmatic biological opinion (HIP4 BiOp).

No separately listed Oregon state endangered plant species are present on the WMAs (Oregon Department of Agriculture). ODFW staff routinely survey the WMAs for the presence of listed species and would document any populations of these species and avoid them.

Non-listed plant species would be impacted by vegetation management actions. Vegetation removal would be targeted at invasive and non-native species. ODFW staff would minimize the disruption to non-target species to the greatest extent possible and the long-term effects of removing undesirable vegetation would promote better conditions for native plants and improve the quality of vegetation on the WMAs.

Notes:

- All herbicide applications would be consistent with the requirements of the HIP4 BiOp, which includes limits on application times and the types of chemicals which can be used, requires annual reporting to BPA of the total amount of herbicide used, and has species-specific conservation measures to ensure that herbicide use does not adversely affect non-target fish, wildlife, and plants.

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

Potential for Significance: No

Explanation: Habitat for ESA-listed streaked horned lark (*Eremophila alpestris strigata*) is present at the Herbert Farm Natural Area as well as the Coyote Creek WMAs (IPaC). Streaked horned lark nest in open prairie and sparsely vegetated grassland in the southern Willamette Valley. ODFW staff routinely survey WMAs for the presence of streaked horned lark and its nests and would document any noted locations for avoidance during the proposed actions. Proposed actions which take place during lark nesting season (typically late May through early August) would avoid nesting habitat with buffers of at least 100 feet. The proposed actions would therefore be unlikely to adversely affect streaked horned lark, consistent with the determination of the HIP4 BiOp.

Additionally, ideal nesting habitat for ESA-listed yellow-billed cuckoo (*Coccyzus americanus*) can be found on many of the WMAs (IPaC). Yellow-billed cuckoo migrates during its nesting season (typically May to late August) to multilayered riparian forests in the Pacific Northwest. None of the proposed actions would substantially affect these forests during cuckoo nesting season. Moreover, proposed actions like planting at the Palensky Wildlife Area would help improve the conditions for cuckoos. The proposed actions would therefore be unlikely to adversely affect yellow-billed cuckoo, consistent with the determination of the HIP4 BiOp.

ESA-listed Fender's blue butterfly (*Icaricia icariodes fender*) has been observed at the Herbert Farms Natural Area (IPaC). Fender's blue butterfly relies on stands of ESA-listed Kincaid's lupine for habitat and forage throughout its life stages. The populations of Kincaid's lupine on the WMA are under active observation and avoidance (see Plants above). The proposed actions would therefore be unlikely to affect Fender's blue butterfly, consistent with the determination in the HIP4 BiOp.

Oregon state-listed California brown pelican (*Pelecanus occidentalis californicus*) is occasionally observed at the Flight's End and Palensky Wildlife Area WMAs (ODFW Wildlife Division). Pelicans are not common as far inland as the WMAs and have only been documented at the WMAs sporadically. If there are pelicans in the area, they would be unlikely to be affected by the proposed actions. None of the proposed actions would affect the rocky beaches and waterways where the pelicans feed and rest.

Non-listed wildlife would be temporarily disturbed by human presence and noise from equipment during some of the proposed actions. These effects would be temporary, consistent with typical O&M on these WMAs, and cause no long-term negative effects to wildlife. Overall effects would therefore be low.

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

Potential for Significance: No

Explanation: ESA-listed bull trout (*Salvelinus confluentus*), Chinook salmon (*Oncorhynchus tshawytscha*), coho salmon (*O. kisutch*), green sturgeon (*Acipenser medirostris*), and steelhead trout (*O. mykiss*) are all regularly found in the Willamette River and many of its tributaries. While many of the WMAs are situated near these waterways, no proposed actions would take place in these streams aside from fish population surveys at some of the WMAs. Surveys would be visual and would not greatly affect fish beyond minor temporary disturbance from human presence and noise. The proposed actions in upland areas would not affect fish beyond potential runoff from herbicide applications, but these effects would be minimized by following the conservation measures in the HIP4 BiOp for herbicide use. Overall effects would be low and unlikely to adversely affect these fish, consistent with the determination in the HIP4 BiOp.

No separately-listed Oregon state endangered fish species are present on or near the WMAs (ODFW Wildlife Division).

Effects on non-listed fish species would be functionally identical to those on listed species.

6. Wetlands

Potential for Significance: No

Explanation: There are mapped wetlands located on the WMAs (USFWS National Wetland Inventory). No actions are proposed which would result in the destruction or degradation of these wetlands. Project actions like vegetation management would seek to improve conditions for local wetlands by removing non-native plants. Overall effects on wetlands would therefore be low and mildly beneficial.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No new wells or groundwater use are proposed. No actions are proposed which would affect the quality or quantity of local groundwater.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The Sorenson Meadows and Palensky Wildlife Area WMAs are owned by BPA. The Herbert Farm Natural Area WMA is owned by the city of Corvallis, Oregon, with ODFW holding a conservation easement on the property. The Big Island WMA is owned by the McKenzie River Trust, with ODFW holding a conservation easement on the property. ODFW owns the remaining WMAs in fee.

No changes in ownership of any WMA are proposed. No changes in land use would occur as a result of the proposed actions, as all the WMAs are currently owned and maintained for fish and wildlife habitat. While some projects may require temporarily revoking public access, no long-term changes to the current public use of the properties are proposed.

9. Visual Quality

Potential for Significance: No

Explanation: Effects on local aesthetic quality would be limited. Removing trash and debris, keeping infrastructure in good order, and removing encroaching invasive and non-native vegetation would all improve the visual quality of the WMAs, but these effects would be mild and not result in any large-scale changes to the public's aesthetic enjoyment of the WMAs.

10. Air Quality

Potential for Significance: No

Explanation: Equipment and machinery used for some of the proposed actions, such as trucks and ATVs, would produce exhaust. This would have short-term effects on local air quality but would not cause any long-term impacts.

11. Noise

Potential for Significance: No

Explanation: Equipment and machinery used for some of the proposed actions, such as trucks and ATVs, would produce noise. This would have short-term effects on local noise levels but would not cause any long-term impacts.

12. Human Health and Safety

Potential for Significance: No

Explanation: All personnel would use best practices to ensure human health and safety. All equipment and machinery would be operated solely by trained and licensed (when applicable) personnel.

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: Two of the WMAs – Sorenson Meadows and the Palensky Wildlife Area – are owned by BPA. No further coordination would be needed for projects on these properties. The Herbert Farms Natural Area WMA is owned by the City of Corvallis, Oregon, and ODFW holds a conservation easement on the property. Projects on this property would be covered by this conservation easement, and ODFW would coordinate with Corvallis as needed. Projects on the Big Island WMA, which is owned by the McKenzie River Trust, are similarly subject to ODFW's conservation easement on the property. The remaining WMAs are owned by ODFW and would require no external coordination.

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

Signed:

Thomas DeLorenzo
Environmental Policy Analyst