

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: West Sand Island Tidal Channel Restoration Project – Vegetation Management

Project No.: 2010-004-00

Project Manager: Anne Creason, EWL-4

Location: Clatsop County, Oregon

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: West Sand Island is an island near the mouth of the Columbia River Estuary near Astoria, Oregon in Clatsop County. The Columbia River Estuary Study Taskforce (CREST) has proposed to implement a tidal channel restoration project on the island in FY20. The West Sand Island Tidal Channel Restoration Project involves extensive invasive plant removal and tidal channel reconnection. During Project Review Committee (PRC) meetings, specific to estuary project planning, U.S. Fish and Wildlife representatives recommended that yellow-flag iris (*Iris pseudacrous*) be treated at the project site for at least two years. Therefore in 2019, BPA is funding CREST to apply herbicides to yellow-flag iris patches along the exterior of the island adjacent to Baker Bay in the estuary prior to full project implementation.

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/ Elisabeth Bowers

Elisabeth Bowers

Contract Environmental Protection Specialist

ACS Professional Staffing

Reviewed by:

/s/ Chad J. Hamel

Chad J. Hamel

Supervisory Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel

NEPA Compliance Officer

Date: May 2, 2019

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: West Sand Island Tidal Restoration Project – Vegetation Management

Project Site Description

West Sand Island is an island near the mouth of the Columbia River Estuary near Astoria, Oregon in Clatsop County. An artificial berm was installed along the north and east sides of the island to stabilize it. Yellow-flag iris patches were identified in several locations near the berm along the exterior of the island adjacent to Baker Bay. Prior to full implementation of the West Sand Island Tidal Restoration Project, herbicides would be applied to these yellow-flag iris patches.

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. Historic and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> Yellow-flag iris is a non-native invasive plant species and has no cultural significance. In addition, no ground disturbance is proposed during herbicide application. Therefore, no significant impacts to historic and cultural resources are anticipated.</p>		
2. Geology and Soils	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> No ground disturbance is proposed during the yellow-flag iris herbicide application. Therefore, no significant impacts to geology and soils are anticipated.</p>		
3. Plants (including Federal/state special-status species and habitats)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> There is no record of plant species under Federal/State protection on West Sand Island. However, during initial site surveys, a native plant community was observed within the dunes along the southwest edge of the island. This area would not be disturbed during the herbicide application activities. Yellow-flag iris would be specifically targeted on the northern and eastern edge of the island along an artificial berm feature.</p>		
4. Wildlife (including Federal/state special-status species and habitats)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> The primary wildlife concern on West Sand Island is the potential to affect migratory birds during project activities. West Sand Island is within the range of streaked horned larks; however, they require large, open, flat areas with extensive bare ground. This type of habitat is found along the western edge of the island but not in the vicinity of the herbicide application activities; therefore, this action is not anticipated to affect streaked horned larks. There is a known bald eagle nest on the island; however, the yellow-flag iris herbicide application would occur at least 80 feet away from the nest through a forested area, would use no loud machinery (only a backpack sprayer/bottle), and would not remove any trees. Therefore, no impact to the bald eagle nest is anticipated. In addition, CREST has already received a bald eagle permit for implementation of the entire project from the U.S. Fish and Wildlife Service.</p>		

5. **Water Bodies, Floodplains, and Fish**

(including Federal/state special-status species, ESUs, and habitats)



Explanation: West Sand Island is located between Oregon and Washington at the mouth of the Columbia River in the estuary and is within Clatsop County, Oregon. The yellow-flag iris herbicide application would occur approximately at the mean high water (MHW) line in the high marsh next to the artificial berm along the eastern edge of the island. This area is subject to tidal inundation seasonally, mostly in the winter. The herbicide application activities would occur during times when the yellow-flag iris areas in the high marsh are dry. It would be applied with a backpack sprayer/bottle using only aquatic formulations of herbicides and would be limited to specific areas.

Columbia River populations of Chinook, coho, sockeye, and chum salmon, as well as steelhead use the estuary in proximity to the proposed restoration activities. In addition, the estuary is designated critical habitat for the Eulachon Southern DPS and Green sturgeon Southern DPS. However, the proposed yellow-flag iris herbicide application is not anticipated to impact these species since the proposed action would comply with all estuarine herbicide application conservation measures as directed by the Habitat Improvement Program Biological Opinion. These conservation measures would minimize any potential exposure of these species to harmful effects of herbicide chemicals.

6. **Wetlands**



Explanation: The yellow-flag iris areas where herbicides would be applied are located within a high marsh, which is a category of tidal wetland. No ground disturbance would occur as part of the proposed activity so the soils and hydrology of the high marsh would remain undisturbed. The proposed action would avoid significant impacts to vegetative communities within the high marsh by specifically targeting yellow-flag iris, applying herbicides in the dry, and complying with other estuarine conservation measures as directed by the Habitat Improvement Program Biological Opinion. Therefore, no significant impacts to wetlands are anticipated as a result of the herbicide application.

7. **Groundwater and Aquifers**



Explanation: Ground disturbance is not proposed as part of the yellow-flag iris herbicide application; therefore, no impacts to groundwater or aquifers are anticipated.

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



Explanation: West Sand Island is a natural estuarine island that historically has been altered by natural forces on the Columbia River (storm surges, wind, freshets, etc.). The island was stabilized through jetty and pile dike construction and artificial berm development, and is currently owned and managed by the U.S. Army Corps of Engineers. The yellow-flag iris herbicide application would have no effect on the land use of West Sand Island.

9. **Visual Quality**



Explanation: The yellow-flag iris herbicide application would not alter the visual quality of West Sand Island.

10. **Air Quality**



Explanation: The yellow-flag iris herbicide application would be accomplished using a backpack/bottle sprayer. Therefore, no significant impacts to air quality are expected.

11. **Noise**



Explanation: The yellow-flag iris herbicide application would be accomplished using a backpack/bottle sprayer. Therefore, no significant impacts to noise levels are expected during these activities. The loudest noise associated with this action is caused by traveling by boat to access the island; however, the noise of the boat engine is a regular occurrence in this area and therefore, matches the background noise levels of the estuary.

12. Human Health and Safety



Explanation: Since the yellow-flag iris herbicide application would be accomplished with a backpack/bottle sprayer by a licensed professional, no human health and safety impacts are anticipated from the proposed action.

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, if necessary:

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- 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, if necessary:

- 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, if necessary:

Landowner Notification, Involvement, or Coordination

Description: CREST has been coordinating with the landowner, the U.S. Army Corps of Engineers (Corps), Portland District, in regards to site access and implementation of the restoration project as a whole. Regarding the yellow-flag iris herbicide application, CREST is in the process of obtaining an Archaeological Resources Protection Act (ARPA) permit from the Corps for the archeological survey of the island. The permit would also grant permission for CREST to conduct the herbicide application activities. The ARPA permit process is expected to be complete by mid-May of this year (2019).

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

Signed: /s/ Elisabeth Bowers
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Date: May 2, 2019