Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Geotechnical Investigation of Butte Radio Station Site

Project No.: P01237

Project Manager: Ben Younce

Location: Jefferson County, MT

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B3.1 Site characterization and environmental monitoring

Description of the Proposed Action:

BPA is in the scoping process for a new radio station tentatively named "Butte" Radio Station, to be located about 4.5 miles east of downtown Butte, MT. Geotechnical investigation is needed at the site to characterize subsurface conditions for the proposed communication building and radio tower foundation design. Information provided by the investigation would be vital to proper facility placement, safe construction, and long-term site reliability.

Subsurface conditions at the proposed new communications building and radio tower locations would be explored by test pit excavations, exact locations of which are yet to be determined. Anticipated materials include loose silty sand with gravel (granitic residual soils), and scattered large granite boulders. Currently an area of about 0.3 acres has been identified as a study area. Final test pit locations would be based on the most recent site development plans at the time of the investigation.

Access to the site would be via an existing privately-owned road leading to existing, unrelated communication facilities. Rubber-tired backhoe equipment would be used to excavate up to four test pits. The test pits would measure approximately 3-foot-wide by 12-foot-long and extend to maximum depths of 12-15 feet, or to refusal on bedrock. Excavated soils would be temporarily stored beside the test pits. These factors and the associated equipment movement would result in an approximate disturbed area of about 220 square feet at each test pit location. After completion, the test pits would be immediately backfilled, the area graded to original contours, and a wood lath placed near the center of the test pit location. Conserved topsoil or duff would be placed over the disturbed area.

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/ Michael J. O'Connell
Michael J. O'Connell
Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel Date: *June 14, 2019*
Sarah T. Biegel
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.

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Project Site Description

The study area for the new radio station siting is located inside the sharp bend of an existing access road used by multiple users to reach communication facilities at higher elevations. The BPA site is approximately 8,200 feet above sea level, surrounded by rather short-stature, mixed-conifer forest. Surface soils seem to consist of fill from road creation, and dry, sandy, and rocky soil with a duff layer. The ridge where the station would be placed is highly prominent: along I-15, and just over 0.5 miles north of the Our Lady of the Rockies memorial statue. The station would be over 50 feet lower in elevation than existing communication facilities just to the north.

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**	☑	☐

Explanation: A BPA archeologist visited the site and determined that the geotechnical investigation could be done with no potential to affect historical resources. If the site is found to be satisfactory for construction, formal MT State Historic Preservation Office and Tribal consultations would commence with a full archeological survey as a likely requirement.

2. **Geology and Soils**	☐	☑

Explanation: The geotechnical study would occur in a dry time of year: late summer, thereby likely eliminating potential for runoff. Under supervision of a geotechnical engineer or geologist, the equipment operators would place soils and rocks directly back in the trenches after study has completed. Trenching, sampling, and observations would be completed within one day.

Note:

- ✓ If topsoil or duff is present, separate it from the underlying soil and reserve it to amend the backfilled test pit locations.
- ✓ Use equipment with rubber tires.

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

Explanation: A survey for special-status plants was performed on June 11, 2019. There were no special-status species in the area of potential disturbance by the geotechnical trenching activities. The Federal Endangered Species Act (ESA) listing candidate, whitebark pine, was found to be present adjacent to the area of effect. Work covered by this CX would not affect the individuals found. Some herbaceous and woody plant species would be crushed by equipment, but roots would be left in place. Some vegetation cover would be lost by the direct impacts of the trenching activity. It would be anticipated that natural recruitment of new plants would occur with time. The invasive exotic species, knapweed, was found along the access road, but no noxious species of concern were found in the area of effect.

Note:

- ✓ Stage on vegetation-free surfaces as possible.
- ✓ Avoid pulling off-road to the maximum extent possible. Carry maps (to be provided) of the

knapweed locations and do not stop or pull off at these locations.
- ✓ Power-wash the undercarriage of the vehicles prior to travelling on the access road.

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

Explanation: On June 4, 2019, informal consultation with the US Fish and Wildlife Service (USFWS) Montana State Ecological Field Office by BPA regarding the geotechnical study – and the full radio station development project as would be proposed at the study site – resulted in a concurrence that the actions may affect but would not likely adversely affect grizzly bear, Canada lynx, or North American wolverine (the USFWS-listed and proposed species under the ESA). Conservation measures centering on grizzly encounter avoidance were essential to reaching concurrence. No breeding birds of concern would be impacted since the work would take place after the majority of locally present birds complete breeding.

Note:

- ✓ Follow all USFWS conservation measures of the concurrence letter of June 4, 2019.

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

Explanation: The amount of disturbance would be localized in a small area of relatively flat terrain at a high elevation. These points and the condition that materials excavated would be placed back in the trenches on the same day would negate any concerns for entry of sediment or possible equipment fluids to hydrologic systems.

6. **Wetlands** ☑ ☐

Explanation: The site of study is situated on a high-elevation, dry ridge with no wetlands or surface water near the work location.

7. **Groundwater and Aquifers** ☑ ☐

Explanation: In the unlikely event that perched water tables are reached by the excavation activity, appropriate best management practices would be in place to prevent contamination of water.

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

Explanation: The area of study and of potential radio station placement is on private land where multiple radio stations are in operation nearby. The Our Lady of the Rockies memorial is not within sight of the potential Butte Radio Station site. The access road also hosts the tour buses that service the memorial, but these currently co-exist with the other radio station users accessing their sites. The short timeframe for the study would not require special traffic considerations along the multiple-use road.

9. **Visual Quality** ☑ ☐

Explanation: The geotechnical study work could potentially produce dust visible in the valley below but this would be short-lived and relatively small in volume.

10. **Air Quality** ☑ ☐

Explanation: Only short-term and localized effects on air quality would be expected from equipment exhaust and potential dust production. These would not rise to a noteworthy degree above normal maintenance activities at the nearby radio facilities.

11. **Noise** ☑ ☐

Explanation: Heavy equipment used to dig the trenches would produce noise above normal daily operating levels for the immediate vicinity. Since this would persist for less than one day, there would be no potential for significant noise effects.

12. **Human Health and Safety** ☑ ☐

Explanation: Workers would follow applicable state and BPA safety protocols; safety of the public or adjacent landowners would not be affected by the work.

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: BPA has obtained the proper landowner permissions to access the site and perform the geotechnical investigation.

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

Signed: */s/ Michael J. O'Connell* Date: *June 14, 2019*
Michael J. O'Connell
Environmental Protection Specialist