Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Eugene Region VHF Radio System Upgrades – Goodwin Peak

Project No.: P01237

Project Manager: Ben Younce, TEPF-CSB-2; Rian Dustan, TTBP-DITT-2

Location: Lane County, Oregon

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.19 Microwave, meteorological, and radio towers

Description of the Proposed Action: Bonneville Power Administration (BPA) is proposing to replace its aging very high frequency (VHF) radio system at its facilities with a simple, modern, VHF two-way radio system in its Eugene VHF radio region. Field personnel use this system for communication with each other and with data control centers. The replacement would help improve voice coverage and help BPA meet its goals of safe facilities maintenance and operations, and uninterrupted power transmission. These proposed upgrades are being coordinated with similar efforts at many radio stations across BPA's service area under the "Mobile-REDI" project.

At Goodwin Peak, proposed backhaul equipment activities include the installation of a new VHF router and network management system (NMS) term server and associated electronics and hardware in new and existing equipment racks. The existing battery would be upgraded to a new valve regulated lead-acid (VRLA) battery and a new battery charging rack would be installed. Ground bars would be installed beneath the existing wave entry port both on the interior and exterior of the communication building. Co-ax cable would be connected to the interior ground bar and hardware, and routed through a new wave entry port. The HVAC steel structure would be connected to the exterior ground bar. An additional exterior ground bar would also be installed on and connected to the existing tower and ladder. For exterior grounding, up to 5 potholes would be hand dug to a depth of 18-30 inches to replace and connect ground wires to the ground ring.

Proposed fronthaul equipment activities would include installation of a new 20-foot whip antenna and a new VHF repeater, which would be connected to the new run of coax cable. Fall protection would also be upgraded by installing the MSA Latchways cable safety system on the existing communication tower and ladder. The cable would be anchored to the tower at the top and bottom by new support beams and attached along its length by new brackets.

BPA would perform abatement of existing hazardous materials (lead and asbestos) as needed before work begins. After installation, all equipment would be connected and tested. Any obsolete equipment would be removed and properly disposed of as needed.

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/ Nancy A. Wittpenn
Nancy A. Wittpenn
Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel *September 22, 2021*
Sarah T. Biegel Date
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 work would take place in an existing building, tower, and support structures at an existing fenced BPA radio site. The tower and support structures are in a previously-disturbed graveled facility yard. The radio site is surrounded by a forested landscape in various stages of regrowth, in the Siuslaw National Forest.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: A BPA Archaeologist and Historian reviewed the undertaking and determined the activity to have no potential to cause effects to historic properties. The Goodwin Peak Radio Station, constructed in 1953, was determined eligible for listing in the National Register of Historic Places in 2019 (BPA Microwave Radio Stations Technical Report, AECOM 2019). The Manual for Built Resources Microwave Radio Sites Addendum (AECOM, 2020) provides treatment guidance to navigate the Section 106 regulatory process. The project has activities that require screening by the BPA Historian and the proposed activities are minor modifications and equipment additions that would not affect the character defining features of the site. The proposed activities do not meet the requirements of activities that require Section 106 consultation.

2. Geology and Soils

Potential for Significance: No

Explanation: All ground disturbance would be limited to the previously-disturbed graveled yard, mainly between the radio tower and the supporting building; and include up to 5 manually dug holes in the yard to the depth of the grounding mat (18-30 inches).

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

Potential for Significance: No

Explanation: All work would take place in the graveled yard that is maintained to prevent plant growth.

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

Potential for Significance: No with Conditions

Explanation: Work would be limited to the existing facility and there would be only minimal potential disturbance to most wildlife in the vicinity from the noise generated directly at the site or the vehicular traffic to and from the site.

To address potential effects to Marbled Murrelet and Northern Spotted Owl—both listed as threatened under the Endangered Species Act—BPA completed informal Section 7 consultation with the U.S. Fish and Wildlife Service, who concurred on March 19, 2019, that the proposed action may affect, but not likely to adversely affect, both species at this site. Since the 2019 consultation, additional activities described in the project description were discussed with USFWS on September 1, 2021 (Joe Zisa, USFWS, pers. comm.). These activities would not cause additional noise impacts than those described in the 2019 consultation. Because BPA would not remove trees or vegetation, there would be no effect to designated Critical Habitat. To avoid and minimize potential effects, BPA would schedule work during the timeframes below.

Notes:

- The following avoidance and minimization measures apply:

The Northern Spotted Owl is sensitive to noise during the critical breeding period (March 1 – July 15) when a flush response may result in nest abandonment. To eliminate the potential for disturbance to nesting owls during the critical nesting period, BPA would schedule work after July 15 and before March 1.

The Marbled Murrelet critical nesting period is April 1 to August 5. The late nesting season runs until September 15. To avoid and minimize disturbance and disruption during these periods, BPA would schedule no more than three days of construction during the critical-nesting breeding period (April 1 to August 5). In addition for all work between April 1 and September 15, BPA would implement daily timing restrictions to ensure that work occurs no earlier than two hours after dawn and no later than two hours before dusk.

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

Potential for Significance: No

Explanation: Ground disturbance would be small and localized within the existing graveled yard. The potential for erosion would be very low to non-existent because the site is relatively level and best management practices would be used to cover and control excavated soil on-site, limiting soil loss. This facility is not in a floodplain nor is it in close proximity to water bodies.

6. Wetlands

Potential for Significance: No

Explanation: Work would take place within the existing graveled yard with no potential to affect wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Disturbance of facility ground would be minor and would not reach below the grounding mat at around 18-30 inches below ground surface.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The work would take place at the existing facility and new equipment would be similar in nature and not out of character with existing equipment being replaced. No change in land use would occur.

9. Visual Quality

Potential for Significance: No

Explanation: While there would be slight changes in the types of equipment being removed and replaced, these changes would not constitute a substantial change in visual quality.

10. Air Quality

Potential for Significance: No

Explanation: Minor, localized, and temporary generation of emissions and dust from increased vehicular traffic and ground disturbance would occur from project activities.

11. Noise

Potential for Significance: No

Explanation: Minor intermittent noise from construction activities would occur. See Wildlife above.

12. Human Health and Safety

Potential for Significance: No with Conditions

Explanation: Minor exposure to asbestos or lead could occur during the described work. Contractors performing the work would have a current Class III Competent Person certification for asbestos operations and maintenance, and apply BPA-approved mitigation measures when cutting/drilling through potentially lead-or-asbestos-containing materials. If BPA performs any of the work, BPA Work Standards and the Safety and Health Program Handbook for such hazards would be followed.

Vented lead-acid (VLA) and VRLA batteries would be handled during replacement. VLA batteries would be coupled with hydrogen detectors to monitor levels of the gas inside communication buildings. Workers would take all necessary handling precautions to prevent spill or leakage. Spills or leakage would be neutralized using standard measures. Old batteries would be packed and shipped according to BPA Pollution Prevention and Abatement requirements.

A Pollution Abatement Clearance (PAC) would be completed for any disturbed yard material needing disposal off-site.

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: See above Human Health and Safety.

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: See above Human Health and Safety.

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's Realty Specialist coordinated with the Siuslaw Special Uses and Land Program Manager on agreed-upon terms and requirements needed for the described proposed activities. The Siuslaw PM reviewed the CX and will receive a copy for their files.

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

Signed: */s/ Nancy A. Wittpenn* *September 22, 2021*
Nancy A. Wittpenn, ECT-4 Date
Environmental Protection Specialist