

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Mount Hebo Communications Site Project

Project Manager: Ben Younce, TEPF-CSB-2

Location: Yamhill County, Oregon

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.19 Microwave, Meteorological, and Radio Towers; B1.20 Protection of cultural resources, fish and wildlife habitat; B3.2 Aviation activities

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to upgrade its communications site located at Mount Hebo. Equipment upgrades and a communications building replacement at Mount Hebo are necessary to meet current safety and reliability standards.

To facilitate the necessary upgrades, the following activities would occur:

- Expand the communications site by about 2,400 square feet, and install a new perimeter chain link fence and access gates around the communications site
- Remove and reinstall segments of an existing wooden split-rail fence
- Install large boulders or other U.S. Forest Service (USFS) approved natural traffic barriers around the communications site to prevent unauthorized vehicle access into the adjacent meadow
- Replace the existing communications building with a new building, about 14 feet wide by 40 feet long by 10 feet tall, and install new concrete steps at building entrances
- Upgrade indoor communications equipment, racks, batteries, HVAC equipment and ventilation systems, and replace the existing propane-fired backup engine generator (EG) and exhaust systems
- Replace the existing propane tank with a new 2,000 gallon propane tank, footings, and associated propane supply lines
- Replace an existing grid-style antenna currently mounted on the steel-lattice communications structure with up to four, new 6-foot diameter microwave radio dishes and install a new 20-foot-tall VHF antenna near the top of the structure
- Replace cables and install a new ice bridge between the equipment on the steel-lattice structure and an entry point in the new building
- Install a new cable human fall-safety protection system on the vertical climbing path of the steel-lattice structure

The site would be graded, and new gravel would be installed. New electrical station service would be installed in 3-inch diameter conduit placed in a trench about 2-feet wide and 3-feet deep. The trench would be about 190-feet long, and would connect the new communications building to a nearby Tillamook People's Utility District vault.

BPA proposes to stage small construction equipment and vehicles at the communications site, while a temporary, modular construction-office trailer, larger construction equipment, and passenger vehicles would be staged at a designated, USFS pre-approved, 6,500 square foot gravel parking lot area located about 300 feet south of the BPA communications site.

An equipment inspection station and a self-contained temporary weed wash station, about 30 feet wide, up to 3 feet deep, and up to 80 feet long, would be installed at a designated, USFS pre-approved, gravel parking lot area located about 1,300 feet SW of the BPA communications site.

Additionally, BPA proposes to revegetate up to 2 acres of USFS meadow habitat, located immediately west of the BPA communications site, with locally-sourced plant materials from native species found onsite. The meadow habitat revegetation effort supports the conservation of special-status invertebrate species, and aims to mitigate potential construction impacts on those species and their habitats. Photo-documentation of the revegetation area would be performed by an unmanned aerial vehicle, twice per year, over about a 7-year period for vegetation monitoring purposes.

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/ Becky Hill

Becky Hill
Environmental Protection Specialist

Concur:

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: Mount Hebo Communications Site Project

Project Site Description

The project site is located on Mount Hebo, at about 3,150 feet above sea level, in the northern Coast Range of Oregon. Mount Hebo is about 10 miles east of the Pacific Ocean, about 40 miles northwest of Salem, and is located on lands administered by the U.S. Department of Agriculture, Forest Service (USFS), Siuslaw National Forest. The Mount Hebo area of the Siuslaw National Forest is comprised of dense forest stands of second growth western hemlock and Douglas-fir. Nine individual meadows, spanning a 2-mile long ridgeline, total about 65-acres of distinct meadow habitat on Mount Hebo. A communications complex, comprised of five distinct communications facilities, including the BPA Mount Hebo communications site, is located along the eastern edge of one of the meadows near the summit. No freshwater designated critical habitats are located within 1 mile of the project area. However, unnamed headwaters of Three Rivers and Cedar Creek are located about 700 feet east, and 1,200 feet west, respectively, of the project site. Wetlands associated with the same two headwater sources, are also located about 700 feet and 1,200 feet away from the project site.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: The BPA historian and archaeologist reviewed the proposed action and initiated Section 106 Consultation on October 24, 2016, with the Confederated Tribes of the Siletz Indians, the Confederated Tribes of Grand Ronde (CTGR), and the State Historic Preservation office (SHPO) of Oregon. BPA received a response from the CTGR on November 14, 2016, noting the tribe's 'strong and enduring connection' to Mount Hebo. On December 9, 2016, BPA received a response from the Oregon SHPO concurring with the Area of Potential Effect (APE). On June 9, 2017, BPA submitted an updated APE map to the consulting parties that included additional work areas associated with the meadow habitat restoration component of the proposed project. This also resulted in expanding the list of consulting parties to include the USFS. BPA received responses from SHPO concurring with the updated APE for built resources on July 7, 2017, and for archaeology on July 12, 2017.

On January 4, 2021, the BPA historian confirmed that a prior determination determined that the Mount Hebo Radio Station, constructed in 1958, is not an eligible or contributing resource to BPA's built historic resources transmission system. Although constructed within BPA's period of significance, the site was previously evaluated as part of the Microwave Radio Stations Historic Resources Technical Report by AECOM for BPA, and determined to be not eligible for the National Register of Historic Places. Concurrence was received from SHPO in 2019. The BPA archaeologist determined on September 6, 2021, that the

proposed undertaking would result in an adverse effect to a Traditional Cultural Property identified by the CTGR during the consultation process, and notified the above-mentioned consulting parties. On September 10, 2021, the USFS concurred with BPA's determination. On October 13, 2021, the Advisory Council on Historic Preservation (ACHP) was provided the opportunity to review the BPA assessment of the radio station, and an opportunity to propose potential actions to resolve the adverse effects. On October 20, 2021, the Oregon SHPO concurred with BPA's determination.

A letter to the ACHP and consulting parties was sent on October 29, 2021 (and a revised letter on November 1, 2021), inviting the ACHP and the consulting parties to participate in the consultation process regarding the development of a Memorandum of Agreement (MOA). On November 4, 2021, the ACHP declined the opportunity to participate in the MOA development process. The BPA archaeologist worked with the consulting parties to develop an MOA that was signed by BPA on August 31, 2022, USFS on September 12, 2022, and SHPO on September 15, 2022. The CTGR chairperson provided verbal agreement with the MOA to the BPA archaeologist in October 2022; therefore, concluded the Section 106 consultation process.

Notes:

- An Inadvertent Discovery Plan with contact information for the BPA cultural resources lead would be supplied to the construction contractor prior to commencing construction work. Should any cultural resources be discovered during project activities, then all project work must stop in the area, and the cultural resources lead should be notified immediately.
- BPA would fund a CTGR-approved habitat enhancement project in the local area, as outlined in the MOA.

2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: Ground-disturbing activities, including grading, trenching, and excavation up to 3 feet deep in the construction area and weed wash station area, would disturb up to 6,000 square feet of existing gravel areas and up to 500 square feet of vegetated areas.

Auger and shovel-holes would disturb soils in the meadow to create areas for container plant installation, up to 8 inches deep. Some areas of the meadow may be scoured and raked prior to applying native seed. Best management practices (BMPs) would be implemented to prevent the migration of any sediment off site.

Notes:

- Implement a BPA-approved Erosion and Sediment Control Plan (ESCP)
- Implement a BPA- and USFS-approved approved revegetation plan as soon as practicable after disturbance in construction areas

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

Potential for Significance: No with Conditions

Explanation: Vegetation surveys of the project area in 2018 and 2019 documented the Coast Range fawn-lily (*Erythronium elegans*), a federal Species of Concern, a USFS Siuslaw National Forest Sensitive Species, and a state-listed Threatened

species in Oregon. This species was detected near the future weed wash area, along the sides of gravel access roads, and in the meadow habitat within 5 feet of the chain link fence of the BPA communications site. Additionally, the early blue violet (*Viola adunca*), a host plant species for larvae of the federally-listed Oregon silverspot butterfly [*Speyeria zerene hippolyta*], was documented during vegetation surveys. The early blue violet was detected in gravel areas near BPA's communications site, as well as in the meadow habitat immediately surrounding the BPA communications site.

During the summer of 2022, the US Fish and Wildlife Service (USFWS), in collaboration with the USFS botanist, salvaged blue violet plant clusters, some nectar plant species seed, and mature plant material from the project area.

Vegetation surveys indicate that native and non-native plant species would be damaged during construction, including, but not limited to the following: native and non-native grasses, ox-eye daisy (*Lecantheum vulgare*), lupine (*Lupinus* spp.), St. John's wort (*Hypericum perforatum*), yarrow (*Achillea millefolium*), pearly everlasting (*Anaphalis margaritacea*), braken fern (*Pteridium aquilinum*), strawberry (*Fragaria virginiana*), and tansy ragwort (*Senecio jacobaea*). Through project design and implementation phases, the construction area footprint would be minimized to the greatest extent possible to limit impacts to vegetation, including nectar and host plant species. The new chain link fence segments would be installed in a manner that is consistent with the existing, natural slope, and topography, to the maximum extent practicable, to reduce impacts to established vegetation. Altogether, with implementation of the minimization measures listed below, the proposed project would have a little to no impact on state-listed, special-status, or federally-listed Endangered Species Act (ESA) plant species.

Notes:

- Any erosion control products would be certified weed-free and meet or exceed North American Weed Management Association Weed-Free Forage certification standards, and is USFS approved prior to installation
- Seed, mulch, or fertilize all disturbed areas with seed locally sourced from the Mount Hebo plant community. Onsite seed collection would be pre-approved by the USFS and USFWS, or obtained from pre-collected sources. All seed mixes, mulches, and non-vegetative erosion controls must be certified noxious weed free or pre-approved for use by the USFS.
- Post-construction, survey the project site for new and expanding noxious weed species and treat them as necessary.
- Boulders, rock and gravel used for road surfacing, fill material, and other uses, would be obtained from a quarry that is approved by the USFS botanist prior to installation at the Mount Hebo site.
- All heavy equipment and vehicles (including passenger vehicles and work trucks) would be inspected for cleanliness at the base of Mount Hebo Road (at intersection with Highway 22) by a designated Vehicle Inspection Monitor to ensure invasive seeds or plant material are not inadvertently transported to the construction site. Vehicles and equipment that fail the inspection would be denied access to the site and must be cleaned before returning for re-inspection.

- All heavy equipment and vehicles would be inspected a second time at a weed wash station, located about 1,300 feet southwest of the BPA communications site to ensure no new plant material was picked up prior to arriving at the construction site. Should new plant material be detected upon arrival at the second inspection station, the vehicle would be thoroughly cleaned at the weed wash station, re-inspected, and deemed clean by the Vehicle Inspection Monitor, prior to proceeding to one of the two staging areas or the construction site.
- Prior to commencing construction activities, the contractor would install temporary, highly-visible, construction exclusion fencing (i.e. orange snow fencing) and “Sensitive Area” signage to help prevent access into areas known to contain sensitive vegetation and habitats, and to reduce impacts to vegetation as a whole. These sensitive areas must be avoided at all times, unless an urgent situation arises where vehicle access and/or foot traffic access is required to remedy the urgent situation.
- An onsite Biological Environmental Monitor would be present during all outdoor construction activities to help ensure construction crews comply with all agreed upon conservation measures, and to identify any new early blue violet plants and Coast Range fawn-lilies that may sprout, and were not visible/identified during the previous vegetation surveys.
- The Biological Environmental Monitor would perform a vegetation survey of all work areas immediately prior to construction. Should the monitor find previously undocumented early blue violets or Coast Range fawn-lilies, they would temporarily halt all work in the localized area. BPA would work with the construction contractor to see if the project design can be altered on-the-fly to avoid impacts to the vegetation species of interest. Should it be determined that any newly documented plant species of interest cannot be avoided by construction activities, then the halt all work notice in the localized area would remain in effect for no less than 48 hours and no more than 96 hours while the USFWS and USFS are provided an opportunity to salvage the plants.

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

Potential for Significance: No with Conditions

Explanation: The marbled murrelet (*Brachyramphus marmoratus*) and the northern spotted owl (*Strix occidentalis caurina*), federally-listed species under the ESA, have the potential to occur at Mount Hebo. Both species have designated critical habitat at Mount Hebo near the communications site. The Oregon silverspot butterfly, also a federally-listed species, is known to occur at Mount Hebo in the meadows adjacent to the BPA communications site. The Oregon silverspot butterfly does not have designated critical habitat at Mount Hebo.

In accordance with Section 7 of the ESA, BPA requested formal consultation for the Mount Hebo communications site redevelopment project with the USFWS, and received a Biological Opinion (BiOp) on November 2, 2020 (TAILS: 01EOFW00-2021-F-0046). The BiOp concurred with BPA’s May Effect, Not Likely to Adversely Affect determination for the marbled murrelet. It also concurred with the No Adverse Modification determination for designated critical habitats for the marbled murrelet and the northern spotted owl. BPA made a No Effect determination for the northern spotted owl. The BiOp concluded that the proposed action would not jeopardize the continued existence of the Oregon silverspot butterfly, so long as

reasonable and prudent measures, and terms and conditions, described in the BiOp are met.

Ambient noise levels in the local area are relatively quiet. Construction noise and unmanned aerial vehicle use may temporarily disturb wildlife in the local area; however, they are expected to return to the area upon project completion.

Altogether, with implementation of the minimization measures listed below and in the ESA consultation BiOp, the proposed project would have little impact on state-listed, special-status, or federally-listed ESA wildlife species.

Notes:

- See the Plants section above for minimization measures relating to inspections for weeds and temporary exclusion fencing.
- Between July 1 and Sept. 30, no construction activities would be performed, and vehicle speeds would not exceed 5mph in roadway sections that are adjacent to open meadow habitat, to avoid colliding with butterflies in flight.
- Prior to commencing work, the construction contractors must complete an onsite environmental training. During the training, the Environmental Monitor would explain the sensitivity of the habitats immediately surrounding the construction site, BPA's obligations and responsibility to avoid impacts to the Oregon silverspot butterfly, to the maximum extent practicable, and ensure that the crews have a complete understanding of the expectations, and consequences should they not be followed. Construction contractors who have not successfully completed the onsite environmental training would not be allowed to work onsite.
- If a crane is to be stored onsite overnight, then the crane arm must be contracted into the down position at the end of each workday in order to avoid bird collisions.
- No project activities would be performed within 110 yards of potentially suitable marbled murrelets nesting habitat during the species' nesting season (April 1 through September 15).
- Ensure that the final fence configuration (i.e. BPA's chain link fence and USFS's wood rail fence) and boulder layout prevents vehicles and ATVs from entering the sensitive meadow habitat located to the west of the BPA communications site.
- BPA would implement the USFWS and USFS approved Oregon Silverspot Butterfly Habitat Enhancement Plan, which describes in detail the methods for creating 10 square feet of high-quality Oregon silverspot butterfly habitat in the meadow located immediately west of the BPA communications site, for every square foot of vegetation impacted as a result of the proposed action. The enhancement area would be monitored and managed by BPA contractors for no less than three years after initial planting.
- Perform post-planting surveys during the flight period for adult Oregon silverspot butterflies in the new habitat enhancement area to document potential usage
- Perform post-planting surveys of nectar and early blue violet plant establishment in the new habitat enhancement area.

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

Potential for Significance: No

Explanation: The project area does not contain any water bodies, floodplains, or surface connectivity to fish-bearing streams. Therefore, the project would not impact water bodies, floodplains, or fish.

6. Wetlands

Potential for Significance: No

Explanation: The project area does not contain any wetlands. Therefore, the project would not impact wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Ground-disturbing activities would not reach depths of groundwater or an aquifer. Therefore, the proposed action would not impact groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The project site is located within an area permitted to BPA by the USFS for the purpose of a communications site. The proposed action would be consistent with the existing land use of the site, and would be consistent with the USFS's draft Mount Hebo Communications Site Management Plan (dated April 28, 2022). The project site is also located within a USFS-designated Special Interest Area. BPA has and would continue to coordinate with the USFS to ensure that the proposed action would be consistent with the acceptable actions within this Special Interest Area. No land use changes are proposed.

9. Visual Quality

Potential for Significance: No with Conditions

Explanation: The communications building, equipment on the steel-lattice structure, chain link fence, and propane tank would be replaced with materials and equipment that are similar in kind and visual likeness to the existing site conditions. The new chain link fence segments would be installed in a manner that is consistent with the existing, natural slope, and topography, to the maximum extent practicable, to reduce impacts to visual quality from horizontal straight lines that conflict with the surrounding topography. Large boulders would be utilized as natural material, traffic barriers, when practicable. The proposed action would not substantially change the visual quality of the area.

Notes:

- BPA would continue to coordinate and collaborate with the USFS landscape architects as design decisions are made.
- The final design would be consistent with the USFS's draft Mount Hebo Communications Site Management Plan (dated April 28, 2022).

10. Air Quality

Potential for Significance: No

Explanation: There may be a small amount of vehicle emissions during project activities; however, there would be no substantial changes to air quality after the proposed action is complete.

11. Noise

Potential for Significance: No

Explanation: Vehicle use and installation activities would create noise above current ambient conditions. However, noise impacts would be temporary and intermittent. There would be no long-term change in ambient noise following installation activities.

12. Human Health and Safety

Potential for Significance: No

Explanation: Mount Hebo is a regularly visited recreation area during the warm and sunny months of the year. All standard safety protocols would be followed during project activities to minimize risks to construction workers and members of the public potentially recreating at the site, including, but not limited to vehicle flaggers and a communications plan to proactively alert the public of construction activities and schedule that may potentially impact the users experience; therefore, project activities would not impact human health or safety.

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 coordinated with wildlife biologists, botanists, and resource specialists from the USFWS and USFS between 2017 and 2022, and the USFS landscape architects between May and October 2022. BPA also coordinated with Tillamook People's Utility District regarding the new station service, and entities associated with the Pacific Northwest Seismic Network (i.e. U.S. Geological Survey and the University of Washington) regarding their existing seismic sensor equipment and BPA's proposed actions at the site.

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

Signed: /s/ Becky Hill November 02, 2022
Becky Hill Date
Environmental Protection Specialist