

Categorical Exclusion Determination

Bonneville Power Administration

Department of Energy



Proposed Action: Lookout Mountain Radio Station and Access Road Upgrades

Project No.: P01164

Project Manager: Robert Trismen

Location: Bellingham, Whatcom County, WA

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.19 Microwave, meteorological, and radio towers, and B1.3 Routine Maintenance

Description of the Proposed Action: BPA proposes to replace equipment and construct a new building at its Lookout Mountain Radio Station, as well as improve about 4 miles of existing road used to access the station.

Radio Station/Engine Generator Building upgrades

At the Lookout Mountain Radio Station, the existing BPA communications building, engine generator (EG) building, 4000 gallon fuel tank, 40-foot-long concrete block blast wall and the 150-foot-tall microwave tower located in the center of the yard would be retired and removed from the site once the new BPA facility and equipment are operational. The tower would be removed in small sections, probably with a crane, lowered to the ground and dismantled. The foundation would be jack hammered out to a depth of approximately 4 feet below grade, concrete removed from site, and engineered fill imported to backfill the holes. The 150-foot-tall BPA microwave tower on the south side of the site would remain in place. BPA would remove the Voicestream-owned EG fuel tank/accessories and replace it in the expansion area. The project also proposes to co-locate two other existing site tenants (US Army Corp of Engineers and Startouch) into the new BPA multi-purpose building. Lastly, the existing Puget Sound Energy transformer and conduit would be relocated for the new site layout.

BPA would design and construct a 42-foot-long by 20-foot-wide combined communication and EG building, outfitting it with all utilities and the mechanical, electrical and telecommunication systems necessary. This would require expansion of the existing yard to the southwest by approximately 30-feet by 22-feet to provide a location for the new EG fuel tanks. The BPA communications equipment would be moved from the existing building to the proposed multi-purpose building and would require a new wave guide to run from the existing BPA microwave tower to the new building.

Access Road Improvements

The proposed access road work would include: improving approximately 4 miles of existing road by grading selected areas to remove ruts; mowing grasses and brush along the existing roadway and within the roadway prism to create a clear travel lane; removing dead tree snags and live hazard trees along the existing roadway; installing and cleaning drainage culverts; installing drain dips in roadway; cleaning and repairing existing ditches along roadway; and installing aggregate gravel where needed to improve road and access for construction vehicles and prevent future erosion of roadway. One roadside slump

would be addressed by cutting into the opposite cut slope to widen the roadway then filling the slide with the material removed.

Timing

Work on road elements would take place between September 1, 2016 and September 30, 2016, and would restart and conclude during the following September of 2017. Work on radio station demolition, relocation, and construction would likely commence in late spring of 2019, but no earlier than June 1.

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, July 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/ Stacy L. Mason

Stacy L. Mason
NEPA Compliance Officer

Date: August 30, 2016

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: Lookout Mountain Radio Station and Access Road Upgrades

Project Site Description

The project area is located partially on BPA fee-owned property and partially on access road easements at the Lookout Mountain Radio Station and access road on Lookout Mountain in Bellingham, Whatcom County, Washington. Elevations range from 450 feet at the access road entrance to the access road to 2675 feet at the radio site. Lookout Mountain is composed of immature mixed conifer forests most recently changed from state-owned timberland to Whatcom County Parks land. A trails development is planned for the mountain, and the area would be maintained as park land. BPA would maintain land ownership at the radio station and easement rights on the access road. The site consists of the rocked radio station yard, and the approximate 4 miles of access road that are planned for maintenance.

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"/>

Explanation: BPA performed a pedestrian survey of the project area on November 13, 2015 and identified the Lookout Mountain Radio Station as a historic property as defined under NHPA. BPA determined that the project would have no adverse effect on cultural/historical resources. The Washington Department of Archeology and Historic Preservation (DAHP) concurred on the no adverse effect determination on January 4, 2016. The Lummi, Nooksack, Sauk-Suiattle, Stillaguamish, Suquamish, Swinomish, Tulalip, and Upper Skagit tribes were consulted and did not respond to initiation or determination letters.

2. Geology and Soils	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Explanation: The project area is mainly on a previously disturbed road bed and radio station site. There would be no need to access geological resources for the planned work: all road work other than the slump repair is in the road prism and the radio station facilities would need only minor geotechnical sample boring. The tower footings would be removed and these and the existing building foundations would be jackhammered to a depth of 4 feet below grade, concrete removed from the site, and engineered fill would be imported to backfill.

No productive topsoil would be lost except for the roadside portion opposite the slump location that would be removed back to the bedrock outcrop for road-widening in order to isolate the slump from road traffic. The excavation would total less than 50 cubic yards, and the material would either be used to fill in the slump on the opposite roadside, or be disposed of at a BPA-approved site. There would be soil disturbance in the road prism with culvert installs and replacements, and drain dip excavations, however, soils and geological resources would be retained through use of best management practices (BMP's).

Mitigation:

- ✓ Manage all temporary bare soil area and temporary stockpiles using appropriate stabilization BMPs.

3. **Plants** (including federal/state special-status species)



Explanation: Disturbance of vegetation is expected as a direct result of the road work. There would be minimal road shoulder area clearing with shoulder maintenance activities. Four dead snags would be removed to allow for access road traffic of expected larger equipment needed for the radio station construction. To support the long-term safe operation of the road, a danger tree survey identified 42 additional trees that pose potential fall threats to the road because of poor structural integrity. Of these, only two are living. After felling, trees would be left in place on the forest floor to decay and provide nurse log habitat. The trees are a combination of western hemlock, Douglas fir, pacific redcedar, and red alder.

Roadside slump repair would require removal of a portion of the opposite roadside slope that is currently vegetated with low-growing, common plants and one small western hemlock.

The removal of three living trees in total would be a minor impact to the mountain's forest cover. Red alder and western hemlock are common species in the region, and while the individual biomass of the two red alders is relatively substantial, the overall effect on forest biomass on the mountain is small. Further, the productivity of the site would allow for relatively fast grow-in of the clearings by surrounding vegetation and new recruits.

There are no federal or state-listed threatened or endangered species in the project area.

Mitigation:

- ✓ Fell trees before October 1 to ensure dry ground and thereby limit damage to supporting soils and neighboring tree roots.

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



Explanation: The federally-threatened Canada lynx, Oregon spotted frog, streaked horned lark, and yellow-billed cuckoo have the potential to occur in the vicinity of the project area, however, the habitat requirements and life histories of each preclude them from being in the project area or in the potential impact boundaries of the project.

BPA personnel performed a pedestrian survey of the forest around the project area and found potentially suitable nesting and roosting habitat for marbled murrelets (MAMU) and northern spotted owls (NSO) – though the closest recorded occurrences are at 2 and 8 miles, respectively. Both species typically require stands with old-growth characteristics. Some specific commonly-associated nesting characteristics for the species are somewhat large limb diameters at relatively high points in the canopy, moss and mistletoe on limbs, and relatively low canopy closure in the horizontal plane of the nest. MAMU Foraging would not be impacted by the project because they feed in pelagic offshore areas, and the nearest potential site is about 6 miles from planned work. NSO foraging would not be affected as evidence of this activity would halt any hosting tree's removal until after the end of critical nesting season on September 23, or until the following year as needed.

BPA submitted a biological assessment (BA) for MAMU and NSO to the USFWS on August 5, 2016 in which a determination of 'potential to affect, but not likely to adversely affect' MAMU and NSO was made. On August 22, 2016, the USFWS concurred with the determination.

Mitigation:

- ✓ Monitor the tree and snag felling as needed prior and during the work to ascertain MAMU or NSO presence/activity. If activity or evidence of recent activity is observed, the tree's felling shall be postponed until after September 23 (the end of breeding season) or to the following year as needed.
- ✓ Remove trees and snags after September 1, the end of critical breeding periods.

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



Explanation: The federally-threatened bull trout is potentially present in the project's wider vicinity. The road work crosses intermittent streams but these do not drain to bull trout critical habitat – the nearest of which is

6 miles away. There is in-channel (intermittent, cross-drain only) work planned for culvert installs, however, in-water work would be minimized by scheduling work for these activities in the dry season before October 1 and using best management practices for reducing erosion of all soil-disturbing activities associated with the road rehabilitation and radio station construction. The associated BPA Mitigation Implementation Table (MIT) for the Lookout Mountain Radio Station and Access Road Upgrades Project describes in detail the BMP's that are to be followed to protect water bodies, floodplains, and fish.

There would be an overall improvement to runoff quality and quantity with the road rehabilitation effort and installation of new buildings and equipment at the radio station and associated removal of older, more corroded equipment.

Mitigation:

- ✓ Perform all work between June 1 and October 1 to limit potential for construction area runoff.
- ✓ Use BMPs to protect on-site drainage conveyances from construction activities and construction-related materials, including fluids from and for equipment, and caustic and turbid water.
- ✓ Revegetate all disturbed areas upon completion with the BPA-approved 'meadow' seed mix detailed in the Western Washington Stormwater Manual, or other mix with BPA approval in lieu of the 'meadow' mix.

6. **Wetlands**



Explanation: No wetlands would be disturbed and any potential runoff of compromised quality would be minimized with the BMPs described for erosion control to Water Bodies, Floodplains, and Fish, and for preservation of Geology and Soils.

7. **Groundwater and Aquifers**



Explanation: All new equipment installations with potentially hazardous liquids would be outfitted with containment vessels, and construction would be accomplished with spill prevention BMPs. With these BMPs, and with the designed elements limited to mainly previously disturbed and filled areas, no work elements would be expected to impact groundwater, open water, or aquifers.

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



Explanation: The project would take place inside the Whatcom County Lookout Mountain Park, and the Whatcom County Whatcom Lake Watershed. Park and County planning staff have provided input to BPA to make the project less impactful to the current land uses. Road access and safety improvement would benefit Park staff, recreational hikers and bikers, as well as co-tenants of the radio station. Timing of the project has been designed to mirror the Whatcom County Planning watershed construction restriction timeline.

9. **Visual Quality**



Explanation: If the radio station is visible from any key observation points in the park or the vicinity's other recreational lands, the change at the station would not be detrimental to the viewshed. New equipment could be more visible than the older, faded installations, but removal of the central 150-foot-tall communication tower and consolidation to the other tower of similar height in the edge of the yard would contribute to an overall improved visual quality.

10. **Air Quality**



Explanation: The new engine generator would be more efficient than the existing one slated for removal. Permitting would be required through the state of Washington's Department of Ecology in order to comply with Environmental Protection Agency air quality standards for the region.

11. **Noise**



Explanation: The new engine generator would provide power to BPA's Lookout Mountain Radio Station only in the event of a failure of the primary power source to the site. Noise produced by the operation of the new emergency generator and HVAC system would be similar to the noise produced by the operation of existing equipment at the site.

12. **Human Health and Safety**



Explanation: Workers on the project would be required to follow all applicable state and/or federal safety standards for work on energized facilities, forest roads, and hazard trees. There would be no impacts to public safety: access to the radio station site would be controlled during construction, and signage would be posted by Park and BPA staff where needed to restrict access to road and tree work activities.

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: Whatcom County Parks and Whatcom County Planning and Developments staff have been notified of all potential activities and would be notified of current timelines to the extent practicable. Staffs of the respective offices have provided valuable information and suggestions for project improvement.

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
Michael J. O'Connell, ECT-4

Date: August 30, 2016