Categorical Exclusion Determination

Bonneville Power Administration Department of Energy



Proposed Action: Radio Communication Equipment Removal – #KC Disturbance

Project No.: P00214

Project Manager: Carla Clay – TEPF-CSB-2

Location: Crook, Deschutes, Klamath, Lake, and Wasco counties, 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) proposes to decommission communication components at multiple substations and radio facilities in its #KC region in Oregon. Replacement equipment has already been installed and now BPA needs to remove obsolete equipment. The proposed work would improve work areas and the structural integrity of structures that support network operations.

Ground disturbing work at the following BPA facilities would include removing tower foundations, the old communication buildings and their foundations, and propane tank foundations. The removal of towers and propane tanks at these sites is almost complete and was covered in previous CX's dated May 18 and August 20, 2018.

- Applegate Butte Radio Site remove tower foundation, building and foundation, and propane tank foundation
- Buck Butte Radio Site remove building and foundation
- Grizzly Mountain Radio Site remove tower foundation, building and foundation, and propane tank foundation
- Indian Mountain remove tower foundation, building and foundation, and propane tank foundation
- Pine Mountain Radio Site remove tower foundation, building and foundation, and propane tank foundation
- Shaniko Radio Site remove building and foundation, and propane tank foundation
- Swan Lake Radio Site remove tower foundation, building and foundation, and propane tank foundation

The tower foundations (consisting of pedestals) would either be completely removed if the foundation is less than 36" deep or the pedestals would be jack hammered to a minimum of 12" below grade and covered with surrounding soil and rock after cutting anchor bolts and any exposed rebar. Pedestals are typically 24" square in size. Propane tank foundations are typically 12" x 48" in size and 30" deep. The propane tank foundations would be removed and broken up for transport.

Buildings would be tested for hazardous materials and if present would be removed prior to demolition. Equipment within the communication buildings would be removed first. Buildings would then be dismantled. Each building foundation includes nine 16" diameter x 24" deep pilings, a 48" x 60" x 12" engine generator pad, and a 36" x 108" x 6" door pad. All materials would be removed with a backhoe and broken up for transport and disposal as needed. All work would occur within previously disturbed areas. Removed material at all locations would be loaded onto trucks, transported, sorted, and recycled or disposed of in approved facilities.

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.

<u>/s/ Nancy A. Wittpenn</u> Nancy A. Wittpenn Environmental Protection Specialist

Concur:

<u>/s/ Katey C Grange</u>

Date: September 30, 2019

Katey C. Grange or 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.

Proposed Action: Radio Communication Equipment Removal – #KC Disturbance

Project Site Description

All work would take place at seven existing BPA radio sites on BPA fee-owned property, Forest Service property, or Bureau of Land Management (BLM) property, in Oregon. All project sites are in graveled and/or previously-disturbed areas at high elevations. A few sites are contained within fences. The surrounding area varies from small rocky outcroppings, to low-growing native and non-native grasses to shrubs and trees depending on location and elevation.

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource	No Potential for	No Potential for Significance, with
Impacts	Significance	Conditions
1. Historic and Cultural Resources		

Explanation: BPA's archaeologist and built environment historian reviewed proposed activities (undertakings) and determined that no historic properties would be affected by them. Consulting parties included the Oregon State Historic Preservation Office (OR SHPO), the Klamath Tribes, the Confederated Tribes of the Warms Springs Reservation of Oregon (CTWSRO), and the Burns Paiute Tribe. The OR SHPO concurred with the APE via letters dated December 26, 2018 and January 4, 2019. The Klamath Tribes and the CTWSRO responses on January 8, 2019 and April 11, 2019, respectively, did not comment on the APE boundaries but did express project concerns and requested surveys in advance of ground disturbing activities and monitoring during demolition. The OR SHPO concurred both verbally and in writing with BPA's determination of no effect on historic properties on September 9, 2019 and September 20, 2019. The tribes did not respond to BPA's determination, but they were actively involved throughout the consultation process.

The Klamath Tribes also expressed concern for the protection of culturally important botanicals. Although no specific plant type or location has been shared with BPA, the Klamath Tribes influenced the location of work areas to minimize botanical impacts.

<u>Notes:</u> During demolition work, the following measures are proposed to avoid affects to archaeological sites that are either unevaluated or have been previously determined eligible for the National Register:

- Prior to demolition, a pre-demolition cultural resources training would be held for the work crew to ensure they understand how to recognize artifacts and sensitive features, and how to follow BPA's Inadvertent Discovery Plan should cultural materials be encountered during demolition work.
- Jackhammering work would be completed with a 90 lb. hand operated jackhammer to minimize vibrations.
- No demolition equipment or infrastructure being demolished or removed would be suspended over known eligible historic properties or unevaluated cultural resource sites.
- A tribal monitor and/or an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards in Archaeology would be present to monitor any foundation removal work at the Applegate Butte, Buck Butte, Grizzly Mountain, Indian Mountain, Malin Passive, Pine Mountain, Shaniko, and Swan Lake Point locations.
- Flag within 100 feet of the boundaries of identified cultural sites along the existing access roads leading to the Applegate Butte, Indian Mountain, and Swan Lake sites.

2. Geology and Soils

Explanation: Removal of the foundations and buildings would cause ground disturbance but all work would occur

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within previously rocked and/or disturbed areas. Best Management Practices would be used as needed to contain the potential for soil to move off-site. All disturbed soil would be backfilled and the area re-rocked after equipment removal.

	Plants (including federal/state special-status species)				
	Explanation: The equipment to be removed would cause ground disturbance but all work would occur within previously rocked and/or disturbed areas. Any plants growing in the work areas would be crushed or disturbed during excavation activities.				
	With the exception of the culturally-important botanical known to exist in these areas.	s discussed above, no additional sp	ecial-status plants are		
4.	Wildlife (including federal/state special- status species and habitats)		V		
	Explanation: A No Effect Determination has been completed for federally listed threatened and endangered species that could possibly be found in the project areas. Intermittent noise from equipment removal and vehicles on access roads could temporarily affect behavior and movement of wildlife in the area, but no long-term and/or permant affects to wildlife are anticipated.				
	Documented eagle nests are located greater than a mile of Buck Butte, Grizzly Mountain, Indian Mountain, and Pine Mountain radio sites. Because of the distance to documented nests, no effects to potentially occupied nests are anticipated.				
	<u>Note:</u> If the use of helicoptors to transport materials is needed, evaluation of flight paths by the environmental protection specialist would be done to determine if flight paths could affect breeding and nesting raptors (January through August). Helicopter flight paths may need to be adjusted to avoid impacts to breeding and nesting raptors.				
5.	Water Bodies, Floodplains, and Fish (including federal/state special-status species and ESUs)				
	Explanation: No water bodies, floodplains, or fish are present at the communication sites.				
6.	Wetlands	\checkmark			
	Explanation: No wetlands are present at the communication sites.				
7.	Groundwater and Aquifers	\checkmark			
	Explanation: The equipment to be removed would cause ground disturbance but all work would occur was previously rocked and/or disturbed areas at high elevations. No records of groundwater or aquifers bein encountered during original installation of the communication sites exist.				
8.	Land Use and Specially Designated Areas	v			
	Explanation: All work would occur within the existing communication sites and are allowed uses.				
9.	Visual Quality				
	Explanation: Equipment would be removed which may actually improve the immediate visual quality of these sites.				
10.	Air Quality				
	Explanation: Dust would be generated while equipment be temporary.	is being removed but the amount	and duration would		

 \checkmark

Explanation: Intermittent noise would occur during daylight hours from vehicles on access roads travelling to the site, and from equipment removal at the site.

12. Human Health and Safety

<u>Explanation</u>: Buildings and soil would be tested for hazardous materials, as required before demolition. All safety requirements would be followed for hazardous and non-hazardous materials and equipment removal and disposal, which would minimize impacts to human health and 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, 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.

<u>Explanation, if necessary</u>: Buildings and soil would be tested for hazardous materials, as required before demolition. All safety requirements would be followed for hazardous and non-hazardous materials and equipment removal and disposal, which would minimize impacts to 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, if necessary:

Landowner Notification, Involvement, or Coordination

<u>Description</u>: One site is owned in fee by BPA. Others are owned by the USFS and BLM. All access rights have been acquired. The BPA Realty Specialist and Project Manager would coordinate required notification and entry protocol with the landowner/manager before work begins at each site.

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

Signed: <u>/s/ Nancy A. Wittpenn</u> Nancy A. Wittpenn – ECT-4 Date: <u>September 30, 2019</u>