**Proposed Action:** Mobile Redi Latchways Fall Safety Project *(Update to previous categorical exclusion issued on June 29, 2018)*

**Project Manager:** B. Younce, TEP-CSB-2

**Location:** Washington Counties: Lewis, Thurston, Pacific, Klickitat, Walla Walla, King, Wasco, Yakima, Garfield; Oregon Counties: Jefferson, Lake, Crook, Klamath, Multnomah, Douglas; Idaho Counties: Nez Perce

**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 install work safety fall protection equipment at multiple communication sites in Washington, Oregon, and Idaho. Work would occur at the following sites:

- Blyn, Jefferson County
- Boistfort Peak, Lewis County
- Capital Peak, Thurston County
- Coyote Hills, Lake County
- Grizzly Mountain, Crook County
- Hatwai Substation, Nez Perce County
- Indian Mountain, Lake County
- Lower Granite Substation, Garfield County
- Lower Monumental Substation, Walla Walla County
- Maloney Ridge, King County
- Megler, Pacific County
- Odell Butte, Klamath County
- Pomeroy, Garfield County
- Shaniko, Wasco County
- Skyrocket, Walla Walla County
- Sunnyside, Yakima County
- Waterville, Douglas County

BPA would install a cable safety system—the MSA Latchways system—on the vertical climbing path of each communication structure. An anchor support beam would be installed near the top of the structure. The cable system would then be connected to the structure with a series of brackets approximately every 10 feet and a top and bottom anchor. Once installed, workers would use the system when climbing the tower by attaching their harness to a specialized pulley which allows them to glide along the safety cable as they climb.

Installation would require a line truck and two-to-three workers at the structure and one-to-two workers on the ground. Intermittent noise generation would occur from the use of hand tools to install the support beam and Latchway system and gear banging against the steel structures. Noise would occur over six to eight hours in a single day.
These actions would occur on existing structures that are located on both BPA fee-owned land and land where BPA possesses an agreed upon easement with the landowner. The structures would be accessed using BPA’s existing access road system and the proposed work would not require ground-disturbing activities or tree/vegetation removal.

**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/ Laura Roberts  
Laura Roberts  
Environmental Protection Specialist

Concur:

/s/ Katey C. Grange  
Katey C. Grange  
NEPA Compliance Office

Date: **April 30, 2020**

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:** Mobile Redi Latchways Fall Safety Project (*Update to previous categorical exclusion issued on June 29, 2018*)

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**Project Site Description**

All work would take place within BPA substations and radio facilities on BPA fee-owned property or existing easements in Idaho, Oregon, and Washington. This work would not cause new ground disturbance. All project areas have previously been disturbed.

**Evaluation of Potential Impacts to Environmental Resources**

<table>
<thead>
<tr>
<th>Environmental Resource Impacts</th>
<th>No Potential for Significance</th>
<th>No Potential for Significance, with Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Historic and Cultural Resources</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td><strong>Explanation:</strong> BPA’s archaeologist and historian reviewed proposed activities and determined that these types of activities do not have the potential to cause effects to historic properties.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Geology and Soils</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td><strong>Explanation:</strong> No ground disturbance would occur at these existing communication sites.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Plants (including federal/state special-status species)</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td><strong>Explanation:</strong> No ground disturbance would occur at these existing communication sites.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Wildlife (including federal/state special-status species and habitats)</td>
<td></td>
<td>✓</td>
</tr>
</tbody>
</table>
| **Explanation:** In those locations where potential Northern spotted owl and/or marbled murrelet habitat, or eagle nests have been identified, BPA would schedule noise-generating work outside of the critical nesting periods (Northern spotted owl: March to July; marbled murrelet: April to September; eagles: January to August):
  - Sites with eagle nesting timing restrictions include: Grizzly Mountain.
  - Sites with Northern spotted owl restrictions include: Blyn, Maloney Ridge, and Odell Butte
  - Sites with marbled murrelet restrictions include: Boistfort Peak, and Megler. |
| 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 | ✓ | | |
| **Explanation:** No wetlands are present at the communication sites. |
7. **Groundwater and Aquifers**

   **Explanation:** No ground disturbance would occur at these existing communication sites; thus, no impacts to groundwater or aquifers.

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

   **Explanation:** All work would occur within the existing communication sites and are allowed uses. As some sites are owned by the U.S. Forest Service (USFS) or the Bureau of Land Management (BLM), the BPA Realty Specialist and Project Manager would coordinate required notification and entry protocol with the land owner/manager before work begins at each site.

9. **Visual Quality**

   **Explanation:** The brackets and cables would not change the overall visual character of the facilities.

10. **Air Quality**

    **Explanation:** Small amounts of dust and vehicle emissions may occur while line trucks travel existing access roads.

11. **Noise**

    **Explanation:** Minor, intermittent noise associated with activities would occur during daylight hours. Operational noise would not change.

12. **Human Health and Safety**

    **Explanation:** Maintenance activity would improve safety of workers at BPA’s communication facilities.

### Evaluation of Other Integral Elements

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

- Thwart 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:** Most sites are 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: **/s/ Laura Roberts**  
Laura Roberts, ECT-4  
Environmental Protection Specialist  

Date: **April 30, 2020**