Categorical Exclusion Determination
Bonneville Power Administration
Department of Energy

**Proposed Action:** Communication Tower Work-Safety Fall-Protection Installations

**Project Manager:** M. Kovaka, TEP-CSB-2

**Location:** Communications sites and substations in Washington, Oregon, Idaho, and California

**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 proposes to install work-safety fall-protection equipment at multiple communication sites in Washington, Oregon, Idaho, and California. Work would occur through 2021 at the four substations and multiple communication sites listed below with their respective counties and states:

- Augspurger Mountain – Skamania, WA
- Cape Blanco – Curry, OR
- Goodwin Peak – Lane, OR
- Hilltop Substation – Modoc, CA
- North Bend – King, WA
- Scott Mountain – Douglas, OR
- Targhee Substation – Teton, ID
- Wolf Mountain – Lane, OR
- Keeler Substation – Washington, OR
- Colville Substation – Stevens, WA
- Thunder Ridge – Bonneville, ID

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 that 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 require neither ground-disturbing activities nor 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-
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/ Jeffrey J. Maslow  
Jeffrey J. Maslow  
Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel  
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:** Communication Tower Work-Safety Fall-Protection Installations

## Project Site Description

All work would take place within BPA substations and radio facilities on BPA fee-owned property or existing easements in Oregon, Washington, Idaho, and California. 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> Bonneville’s Historian reviewed proposed activities and determined that because they would involve minor additive features that do not adversely impact the integrity of historic structures and also would not have potential to cause ground disturbance, they would not have the potential to cause effects to historic properties.</td>
<td></td>
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<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 and substations.</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 and substations.</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:** Bonneville would schedule noise-generating work outside of critical periods for sensitive species located near project sites.  
- **Thunder Ridge:** No construction between March 15–April 30 to prevent disturbances to Columbian Sharp-Tailed Grouse leks.  
- To address potential effects to Marbled Murrelet and Northern Spotted Owl—both listed as threatened under the Endangered Species Act—Bonneville requested informal consultation with the U.S. Fish and Wildlife Service, who concurred that the proposed action may affect, but not likely adversely affect, both species at some sites. Because Bonneville would not remove trees or vegetation, there would be no effect to designated Critical Habitat. To avoid and minimize potential effects, Bonneville would schedule work during the timeframes specified for those sites:  
  - **Augsburger Mountain and North Bend:** July 16–March 1; two hours after sunrise and two hours before sunset July 16–September 23.  
  - **Cape Blanco, Scott Mountain, Goodwin Peak, and Wolf Mountain:** July 16–March 1; two hours after sunrise and two hours before sunset April 1–September 15; no more than three consecutive construction days. |
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 and substations.

6. **Wetlands**
   - [ ]
   - [ ]

   **Explanation:** No wetlands are present at the communication sites and substations.

7. **Groundwater and Aquifers**
   - [ ]
   - [ ]

   **Explanation:** No ground disturbance would occur at these existing communication sites and substations.

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 Forest Service, Bureau of Land Management, and state land-management agencies, 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 are minor additions that 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:** 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:

- [ ] 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:

<table>
<thead>
<tr>
<th>Landowner Notification, Involvement, or Coordination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description: Most sites are owned in fee by BPA. Others are owned by Federal (U.S. Forest Service or Bureau of Land Management) or state land-management agencies. 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.</td>
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</tbody>
</table>

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

Signed:  /s/ Jeffrey J. Maslow            Date:    April 4, 2019
Jeffrey J. Maslow, ECP-4
Environmental Protection Specialist