Categorical Exclusion Determination

Bonneville Power Administration Department of Energy



Proposed Action: Bat and Rodent Control and Biomass Removal from Taft Substation (*update to August 15, 2022*)

Project Manager: Dayna Ward – NWM-PSB-2

Project Number: PID5252

Location: Mineral County, Montana

<u>Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021)</u>: B1.3 Routine maintenance; B2.1 Modifications to enhance workplace habitability

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to cleanup bat and rodent biomass (i.e., bat guano, rodent feces, expired animals, etc.) from the control house building at BPA's Taft Substation. The proposed work would include High Efficiency Particulate Air (HEPA) filter vacuuming, bio-washing and wet-wiping interior building surfaces, and general clean-up, removal and disposal of biomass from the control house. Clean-up activities inside the control house may take up to one week to complete. Material removed from the building would be disposed of at an approved facility in accordance with all local, state, and Federal regulations.

Additionally, BPA proposes to install bat exclusion devices so bats may exit but not re-enter the building, bat deterrent materials (*e.g.*, mesh and bird spike strips), and bat repellent devices (*i.e.*, ultrasonic wave systems) within and on the control house building. Once bats have exited the building, BPA proposes to permanently block and seal-up building entry points to prevent future bat and rodent entrance.

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.

<u>/s/ Becky Hill</u> Becky Hill Environmental Protection Specialist

Concur:

<u>/s/ Sarah T. Biegel</u> Signing for: 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.

<u>Proposed Action</u>: Bat and Rodent Control and Biomass Removal from Taft Substation (*update to August 15, 2022*)

Project Site Description

The project site is located at BPA's Taft Substation, located in Mineral County, Montana. The substation is located in T20N R31W PB47 on land permitted to BPA by the United States Department of Agriculture, Forest Service, Lolo National Forest. The substation is located in a relatively remote area of western Montana, and is surrounded by forested habitats, with the exception of rights-of-way for BPA transmission lines, that are managed for low growing vegetation. Taft Substation is at about 4,400 feet above sea level and is located about 3 miles north of Interstate 90, 15 miles southwest of Thompson Falls, Montana, and 10 miles east of Mullan, Idaho. Randolph Creek is located about 150 feet north of the substation and is habitat for the Westslope cutthroat trout. About 10 unnamed tributaries to Randolph Creek are located within a 1-mile radius of the substation. No wetlands or water bodies are located within 1 mile of the substation.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: The BPA historian and archaeologist reviewed the proposed action and determined that the undertaking is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present. The historian and archaeologist issued a memo documenting this determination on June 27, 2022. The BPA historian and archaeologist reviewed the updated proposed action on March 21, 2023, and verified the proposed activities still do not have the potential to cause effects on historic properties, should any be present.

2. Geology and Soils

Potential for Significance: No

Explanation: No ground-disturbing activities are proposed. Therefore, the project would not impact geology and soils.

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

Potential for Significance: No

Explanation: No ground-disturbing activities are proposed and the work area is located within and on the Taft Substation's control house. Therefore, the proposed action would not impact vegetation.

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

Potential for Significance: No with Conditions

Explanation: Temporary disruption of normal wildlife behavior could occur from elevated noise levels and human presence at the substation during project activities.

Bat surveys conducted in July 2022 determined that the control house is currently being used as a maternity roost by the long-eared myotis (*Myotis evotis;* Montana Species of Concern). The following species, all Montana Species of Concern, were also documented at the control house during surveys: long-legged myotis (*Myotis volans*), little brown myotis (*Myotis lucifugus*), and Yuma myotis (*Myotis yumanensis*).

The brown creeper, a tree-dwelling, Montana Species of Concern bird, has been documented within 1,000 feet of the Taft Substation. Brown creepers tend to breed in coniferous and mixed coniferous-deciduous forests, preferring mature and old-growth stands with high canopy cover, which are present in the forest habitat surrounding the Taft Substation.

Installation of bat exclusion devices may temporarily disrupt roosting behavior, as the object would allow bats to safely exit the building's roosting sites, yet prevent re-entry. This would require the bats to find and use alternate roosting sites for the remainder of the roosting season in the adjacent forest habitat or the existing human-made bat boxes located nearby.

Bats tend to exhibit roosting site fidelity. The installation of deterrent materials, ultrasonic repellent systems, and permanently blocking building entry points during the non-maternal roosting season may temporarily disrupt bat behavior when they return in the spring to reestablish a maternal roost. However, abundant natural forest habitat and human-made alternative roosting sites located nearby would minimize the duration of the temporary disruption.

Project activities may temporarily displace or disturb non-listed wildlife species but there would be no long-term impacts to wildlife.

Notes

- If clean-up work must occur between dawn and dusk, then the work may only occur between October 15 and April 1, of any given year. However, if the clean-up work can be performed between dusk and dawn, when bats are traditionally away from the roost, then the clean-up may be performed between August 15 and April 1. Regardless of daily timing restrictions, no clean-up work may be performed between April 2 and August 14.
- Clean-up contractors must adhere to National White Nose Syndrome Decontamination Protocol or a BPA pre-approved decontamination protocol to minimize the risk of exposure or spread of White Nose Syndrome.
- Bat exclusion devices must only be installed between August 15 and April 1.
- Installation of bat deterrent materials and repellent systems would only be performed between September 1 and April 1, if feasible.
- Building modifications to permanently block bat entry points must only be performed between September 1 and April 1.

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

Potential for Significance: No

Explanation: Randolph Creek is located about 150 feet north of the Taft Substation and is habitat for the Westslope cutthroat trout, a Montana Species of Concern and USFS Sensitive species. About 10 unnamed tributaries to Randolph Creek are located within a 1-mile radius of the substation. However, the project work area (located at the control house) 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: No ground-disturbing activities are proposed and the work area is located at the control house. Therefore, the proposed action would not impact groundwater and aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The project area is located at the control house, and the proposed action would not alter existing land use. No specially designated areas are present in the project area.

9. Visual Quality

Potential for Significance: No

Explanation: The project area is located at the control house. There would be no change in visual quality following completion of the proposed action.

10. Air Quality

Potential for Significance: No

Explanation: There may be a small amount of emissions produced from 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: Project activities could temporarily and intermittently produce noise levels at greater than current ambient conditions in and around the control house. There would be no long-term change in ambient noise following completion of the proposed action.

12. Human Health and Safety

Potential for Significance: No

Explanation: All standard safety protocols would be followed during project activities. Hazardous materials (i.e., bat and rodent biomass), would be disposed of off-site at an approved facility and in accordance with all local, state, and Federal regulations. Therefore, the proposed action would not be expected to 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

<u>Description</u>: Prior to starting the clean-up effort, the BPA project manager would notify BPA staff and contractors that could be working at the Taft Substation. The BPA environmental compliance lead coordinated with the following organizations and agencies: Montana Fish, Wildlife and Parks, Montana Natural Heritage Program, and the Montana Ecological Services Office of the U.S. Fish and Wildlife Service when developing and updating the mitigation measures.

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

Signed: <u>/s/ Becky Hill</u> Becky Hill Environmental Protection Specialist, ECT-4 <u>April 5, 2023</u> Date