

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: VHF Radio System Upgrades at Noxon and Miller Peak Radio Stations

Project No.: P01237

Project Manager: Eric Lyerla, TEPF-CSB-2

Location: Missoula, and Sanders Counties, Montana

Categorical Exclusion Applied (from Appendix B, 10 C.F.R. Part 1021): B1.19 Microwave, meteorological, and radio towers; B1.7 Electronic equipment

Description of the Proposed Action: Bonneville Power Administration (BPA) is proposing to replace its aging VHF radio system at two northwest Montana radio stations: Miller Peak in Missoula County, and Noxon in Sanders County, with a simple, modern, VHF two-way radio system. Required by field personnel for communication with each other and with data control centers, the upgrades described here are coordinated with similar efforts at many radio stations under BPA's territory-wide *Mobile-REDI* VHF Upgrade program. The project would help BPA meet its goals of safe facilities maintenance and operations, and uninterrupted power transmission in the radio coverage areas.

BPA would install racks and communications equipment that includes batteries (including vented lead-acid [VLA] and valve-regulated lead-acid [VRLA] batteries with spill-containment as needed), fuse panels, other electronics including network componentry, power supply-supporting equipment, and VHF system hardware. AC power system circuitry would be upgraded and there may be a need to make minor alterations to existing radio transmission line ports through building walls and/or add additional adjacent ports. Interior and exterior grounding bars and lightning protection would be installed adjacent to wall ports, and all new equipment would be electrically grounded by manually digging several 18- to 30-inch-deep holes in the station yard and connecting the grounding bars to the existing grounding mat by cadwelding. Small repairs would also be made to the grounding mats where needed.

At Noxon Radio Station, a new 100-foot-tall monopole would be installed in the existing station yard: a foundation would be installed and the pole buried to a depth of 12 feet for a final height of about 88 feet above ground. A new ice bridge would also be constructed from the new monopole to an existing port, traversing about 20 feet around the communications building corner. Approximately eight small pier foundations would be installed below ground to support the ice bridge legs. No blasting would occur.

On both stations' towers, up to two new VHF whip-style 20-foot-long antennas would be installed at approximately middle and/or topmost tower locations. New coaxial cables would be routed from the communications buildings' ports, horizontally along ice bridge aerial cable support structures and vertically up the towers to antennas.

There would be subsequent mobilizations to test and commission the new equipment at the sites, and to decommission and remove old equipment in the building to approved recycling or refuse facilities. These are not yet scheduled, nor is their number known, but the scope would be limited to work on the previously installed equipment. If the scope expands beyond this, new NEPA analysis may be needed at that time.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

Findings: In accordance with Section 1021.102 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; 89 FR 34074, April 30, 2024; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and *DOE National Environmental Policy Act (NEPA), Implementing Procedures* (dated June 30, 2025), BPA has determined the following:

- 1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
- 2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
- 3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.¹

Michael J. O'Connell
Environmental Protection Specialist

Concur:

Katey C. Grange
NEPA Compliance Officer

Attachment(s): Environmental Checklist

¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to the interim final rule to revise DOE NEPA regulations implementing NEPA at 10 C.F.R. Part 1021 and NEPA Implementing Procedures (dated June 30, 2025), to meet its obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

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: VHF Radio System Upgrades at Miller Peak and Noxon Radio Stations

Project Site Description

The BPA Miller Peak Radio Station is located in the U.S. Forest Service (USFS) Missoula Ranger District of the Lolo National Forest. The site is surrounded on all sides by industrial forest land in various stages of regrowth and of varying densities depending on aspect. Park Creek is located about 4,000 feet south of the radio station, and the intermittent Limestone Creek is located about 4,000 feet west of the radio station.

Noxon Radio Station is inside Avista Corporation's Noxon Rapids Dam facilities, adjacent to Avista's substation and maintenance buildings. The existing radio station is about 400 feet from the Clark Fork River (critical habitat for bull trout), just upstream from the Noxon Rapids Dam. The valley where the station is located and the surrounding mountains are heavily wooded with much of the forest under US Forest Service administration. Avista owns the land parcel where BPA would perform the upgrades.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and §36 CFR 800, BPA has determined that the Noxon Radio Station project would take place in the Noxon Rapids Dam Historic District, but that per §36 CFR 800.3(g), the implementation of the proposed undertaking would result in no adverse effect to historic properties (§36 CFR 800.5(b)). On June 13, 2023, BPA initiated consultation and shared its Area of Potential Effect and effect determination with the Coeur d'Alene Tribe, the Confederated Salish and Kootenai Tribes, the Kootenai Tribe of Idaho, and the Montana State Historic Preservation Office (SHPO). As of today, no responses were received and thus BPA would proceed with implicit concurrence.

The work planned for the Miller Peak Radio Station upgrades would be completely within a previously disturbed communications site that is shared with multiple tenants, and none of the work would raise concerns for cultural resources protection. Based on the expected work and the low likelihood of there being cultural resources on the communications site grounds, BPA has determined, per 36 CFR 800.3(a)(1), that this undertaking is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present.

2. Geology and Soils

Potential for Significance: No

Explanation: The excavation at Noxon to install foundations for the new monopole and ice bridge would be limited to the graveled station yard. The monopole would require a 12-foot-deep

hole but the localized nature of excavating in the developed area through gravel and fill would not have an effect on soil and geological resources of the vicinity. Miller Peak work would include only hand-tool excavation for ground mat access.

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

Potential for Significance: No

Explanation: All work would take place in and on communications structures, and in the radio station yards that are cleared and maintained to be free of vegetation. There would be no effects on vegetation.

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

Potential for Significance: No with Conditions

Explanation: According to the State of Montana, Noxon Radio Station is in moderate to prime breeding habitat for the bald eagle so timing disturbance outside of the breeding season is required. Noxon and Miller Peak are both in grizzly bear (ESA-listed Threatened) ecosystem range areas: Cabinet-Yaak Ecosystem, and West-central Ranges and Valleys of Montana, respectively. Grizzly encounters would not be anticipated but could happen and would be prevented to the extent possible. At Miller Peak, wolverine (ESA-listed threatened) could be encountered, but there would be no effect on the species due to the work's avoidance of any effects to habitat. The potential disruption of foraging or other wolverine activity would be a discountable amount because the work is limited to developed radio station grounds and would be of a short duration (several days). With proper adherence to the controls in *Notes*, below, there would be no effects on ESA-listed or other sensitive species.

Notes:

- At NOXR, perform sustained high decibel work (e.g., jackhammer) between August 1 and April 30 to avoid nesting bald eagles. If this timing cannot be met, a survey for bald eagle nest locations would be required to rule out presence.
- Store all food and food waste in grizzly-rated food storage while at both sites.

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

Potential for Significance: No with Conditions

Explanation: Miller Peak work would have no effect on waters. At Noxon, though the work is in close proximity to critical habitat for bull trout, all debris would be managed to prevent stormwater and wind-blown transport to intercepting waters; there would therefore be no effect to bull trout critical habitat or any other waterbody.

Notes:

- Implement erosion and sediment control Best Management Practices (BMPs) to manage all excavated materials. Dispose of any remaining debris after backfilling at a BPA-approved landfill.

6. Wetlands

Potential for Significance: No

Explanation: There are no wetlands in the vicinity and there would therefore be no effects on wetlands from the project.

7. Groundwater and Aquifers

Potential for Significance: No with Conditions

Explanation: It is not known whether there is a water table within reach of the monopole excavation location; therefore all applicable spill prevention procedures, would be implemented during the excavation process.

Notes:

- Ensure work crews have spill kits readily available during construction activities, and use all other applicable spill prevention and containment procedures to avoid contaminating any potential below-ground water sources. BPA Construction Specification 01 57 19 Temporary Environmental Controls can be referenced for the standard Spill Prevention and Response Procedures (Section 1.12).

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: Both radio stations are permitted for BPA operations and maintenance from underlying landowners/managers. Project work and additions would be consistent with the current communication and substation land uses.

9. Visual Quality

Potential for Significance: No

Explanation: The 20-foot-long antennas the project would install are discreet because they are gray in color and just 3 inches in diameter. The monopole at Noxon would not be an addition out of character for the site: the Noxon Dam Switchyard is adjacent to the site and has structures over 100 feet tall.

10. Air Quality

Potential for Significance: No

Explanation: There would be temporary localized increases in vehicle emission concentrations around the sites during construction, but these would be short-lived and would cease when construction ends with no lasting effects.

11. Noise

Potential for Significance: No

Explanation: There would be loud noise generated by the excavation for the monopole at Noxon. The duration of the excavation process would be unlikely to cause disturbance to, or other issues for vicinity residents. The area is sparsely populated with the population center of the town of Noxon situated over 2.5 miles away.

12. Human Health and Safety

Potential for Significance: No

Explanation: Public health and safety would not be impacted by the work that would be limited to radio station grounds. Health and safety of construction personnel would not be adversely impacted because OSHA or BPA safety guidelines would be followed. BPA employee safety during subsequent regional field operations should benefit from the project through better coverage and reliability of the two-way radio communication network.

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

Description: Avista Corporation and the US Forest Service would be fully apprised of plans to the extent dictated by site-specific real property permitting documentation. BPA Real Property has coordinated with both entities, and the work herein is approved as is.

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

Signed:

Michael J. O'Connell
Environmental Protection Specialist