Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Haystack Butte Radio Communication Site

Project Manager: Molly Kovaka TEP-CSB-2

Location: Klickitat County, Washington

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.19 Microwave, meteorological, and radio towers

Description of the Proposed Action: BPA proposes to install a new radio communication site atop Haystack Butte, about 260 feet away from BPAs existing Haystack communication facilities. The existing fiberglass radio station building has reached the end of its life and must be replaced to accommodate installation of additional radio paths that support BPA's communications system. The project would include construction of a new 600-square foot radio station building, installation of an 80-foot tall communications tower, and relocation of an existing shared access road that runs through the proposed parcel.

The proposed radio station would house batteries, communication racks, a generator, and an HVAC system. A propane tank would be located on-site to provide fuel for the backup generator. A new power transformer would be installed on site and connect via a 300-foot long trenched cable run from the new power transformer to an existing off-site power transformer. The 1.5-foot wide by 3-foot deep trench would be backfilled with native materials and recompacted to grade.

The existing radio station, which has already begun to show signs of deterioration, would be decommissioned over time and eventually removed from the leased site along with the existing tower and propane tank. The decommissioning and removal of the existing site is not a part of the current proposed project but will be addressed when all operational communications traffic has been relocated from the existing radio building and upon consultation with the Tribal landowners who hold BPA's lease.

In order to relocate the existing shared access road alignment from the proposed parcel, some fill material would be imported to the site and used as road bedding. About 700 yards of cut materials and 400 yards of fill material would be needed to install the road reroute. About half of the offset materials would be spread downhill of the rerouted road and half would be disposed of off-site. The new road alignment would be 450 feet long by 20 feet wide and 1 foot deep (as road bedding). A new ditch on the uphill side of the road would be installed to catch rainwater and snow and direct it to a new 12-inch culvert that would be installed beneath the realigned road. Riprap would be installed on either side of the culvert to slow flow and minimize rutting potential. All construction activities would occur within an 8,300-square foot BPA-owned parcel and within easements acquired for this project.

About 1.5 miles of existing private access road to the site would be rocked and graded to provide suitable access for construction vehicles. About 2,600 feet of blading and rocking with 1.5 inch minus crushed rock would be needed for the last half mile section of road leading to the site. Another 5,200 feet of light blading and rocking would be needed in the lower eastern section of road where ruts

are beginning to appear and rock has degraded over time. All access road improvements would occur within the existing road prism.

All proposed work would occur within an area that has been heavily degraded by previous communication facility construction and ongoing grazing activities.

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/ Katey Grange
Katey Grange
Environmental Protection Specialist

Concur:

/s/ Stacy L. Mason Date: *December 7, 2015*
Stacy L. Mason
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: Haystack Butte Radio Communication Site

Project Site Description

The site is located on a small, sub-rectangular 8,300-square foot parcel situated on a level bench near the summit of Haystack Butte on the north rim of the Columbia River gorge directly north of the confluence of the Deschutes and Columbia rivers. The site is within the Columbia River Gorge National Scenic Area (CRGNSA). Much of the area has been impacted by ongoing agricultural practices and pastoral farming. Several radio communication facilities and towers are immediately adjacent to the proposed radio communication site.

Evaluation of Potential Impacts to Environmental Resources

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

Explanation:

WA SHPO concurrence on no adverse effect determination 08/06/2015. US Forest Service (USFS) concurrence on no adverse effect 09/01/2015 (as part of CRGNSA consistency review). USFS specified additional conditions, which have been appended to this document. No response from consulting tribes. The following conditions would be implemented:

- ✓ All disturbance associated with access road improvements would occur within the existing road bed.
- ✓ Areas outside of existing access road bed would be fenced to eliminate mechanized disturbance of cultural resource sites.
- ✓ Areas of steep slope would be fenced to ensure that rock fall does not occur downslope of the access road.
- ✓ BPA will provide a Monitoring and Accountability Plan to be vetted by all consulting parties. Plan will include a preconstruction training session.
- ✓ An archaeological monitor would be on site during all construction-related activities.
- ✓ BPA would provide notice to consulting parties for the start of all work and would provide a weekly email summary of activities.
- ✓ Should any historic or prehistoric cultural resources be uncovered during project activities, work would cease and the construction manager would immediately notify BPA archaeologist Brian O'Donnchadha. BPA archaeologist would then notify the Columbia River Gorge National Scenic Area (CRGNSA) archaeologist, WA SHPO, and any relevant tribal governments. In the case of an inadvertent discovery, all steps outlined in Appendix A would be followed.

2. **Geology and Soils**	☑	☐

Explanation:

Radio site construction and access road relocation would require cut and fill slopes and recontouring. A drainage culvert would be installed beneath the relocated section of graveled access road to redirect surface flows. The following conditions would be implemented:

- ✓ An erosion control plan would be developed in accordance with the Washington Department of Ecology

Stormwater Management Manual for Eastern Washington.

- ✓ Topsoils would be captured for re-use on cutslopes.
- ✓ Disturbed areas would be re-seeded with native seed mix.
- ✓ Where possible, native soils will be used for fill. If imported fill must be used, it will match surrounding earth colors.
- ✓ Offset soils will be disposed of off-site in a legal manner.

3. **Plants** (including federal/state special-status species) ☑ ☐

Explanation:

Vegetation consists solely of native grasses that have been disturbed by previous communication tower construction and grazing. The following condition would be implemented:

- ✓ Disturbed areas would be reseeded with native seed mix

4. **Wildlife** (including federal/state special-status species and habitats) ☑ ☐

Explanation:

Area has been used for grazing. No special status species present.

5. **Water Bodies, Floodplains, and Fish** (including federal/state special-status species and ESUs) ☑ ☐

Explanation:

None present. Some additional runoff potential is expected as a result of the cut and fill on site. The following condition would be implemented:

- ✓ A stormwater pollution prevention plan would be prepared and implemented for the project.

6. **Wetlands** ☑ ☐

Explanation:

None present.

7. **Groundwater and Aquifers** ☑ ☐

Explanation:

None present.

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

Explanation:

Proposed radio site is within the CRGNSA. BPA submitted a CRGNSA management plan consistency review application to the USFS in November 2014. The USFS found the project to be consistent with the CRGNSA management plan in their October 22, 2015 consistency determination. The consistency determination contained several mitigation measures that would be implemented and have been incorporated throughout this document. No public comments were received during the public comment period for the CRGNSA consistency review.

Land use would change from grazing to radio communication site. The new radio site and road re-route would be immediately adjacent to existing radio communication facilities. Access road improvements would occur on existing private access road.

9. **Visual Quality** ☐ ☑

Explanation:

BPA performed a visual analysis from key viewing areas identified in the CRGNSA management plan and determined that the new site would be visible from Highway I-84, Washington State Route 142, Dog Mountain Trail, and the Columbia River. The site would be located immediately adjacent to several existing radio communication facilities, most of which are more visible from key viewing areas because of their positioning on the Butte. The following conditions would be implemented:

- ✓ The tower and antenna shall not exceed 80 feet in height
- ✓ The tower and any attached equipment shall be a matte pale gray color to disappear as much as possible into the sky background
- ✓ All exterior buildings, including tower footings, screening fences, and propane tank shall be a neutral, non-reflective matte brown color that will blend into the surrounding landscape
- ✓ The building roof shall be a non-reflective material. Any exterior will be of low or non-reflective material or will be treated to be non-reflective
- ✓ Roofing and exterior paint/color samples will be submitted to the USFS Landscape Architect for approval prior to commencement of construction

10. **Air Quality** ☑ ☐

Explanation:

Small amount of dust and vehicle emissions due to construction.

11. **Noise** ☑ ☐

Explanation:

Temporary construction noise during daylight hours. Operational noise would not change.

12. **Human Health and Safety** ☑ ☐

Explanation:

No impact.

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:

Landowner Notification, Involvement, or Coordination

Description: BPA has acquired the parcel in fee and has been in contact with underlying landowners for the proposed road improvements and staging areas.

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

Signed: */s/ Katey Grange* Date: *December 7, 2015*
Katey Grange

Appendix A: Additional USFS Cultural Resources Conditions

Cultural Resources Discovered After Construction Begins

1. The following procedures shall be effected when cultural resources are discovered during construction activities. All survey and evaluation reports and mitigation plans shall be submitted to the local government and the SHPO. Indian tribal governments also shall receive a copy of all reports and plans if the cultural resources are prehistoric or otherwise associated with Native Americans.

A. Halt of Construction. All construction activities within 100 feet of the discovered cultural resource shall cease. The cultural resources shall remain as found; further disturbance is prohibited.

B. Notification. The project applicant shall notify the local government and the Gorge Commission within 24 hours of the discovery. If the cultural resources are prehistoric or otherwise associated with Native Americans, the project applicant shall also notify the Indian tribal governments within 24 hours.

C. Survey and Evaluation. The Gorge Commission shall survey the cultural resources after obtaining written permission from the landowner and appropriate permits from the SHPO. (See Oregon Revised Statute [ORS] 273.705, ORS 358.905 to 358.955, and Revised Code of Washington [RCW] 27.53). It shall gather enough information to evaluate the significance of the cultural resources. The survey and evaluation shall be documented in a report that generally follows the guidelines in the "Reconnaissance Survey Reports--Large-Scale Uses" and "Evaluation of Significance: Evaluation Criteria and Information Needs" sections of this chapter.

   Based on the survey and evaluation report and any written comments, the local government shall make a final decision on whether the resources are significant. Construction activities may recommence if the cultural resources are not significant.

   A mitigation plan shall be prepared if the affected cultural resources are significant.

D. Mitigation Plan. Mitigation plans shall be prepared according to the information, consultation, and report guidelines contained in the "Mitigation Plans: Mitigation Plan Criteria and Information Needs" section of this chapter. Construction activities may recommence when the conditions in the mitigation plan have been executed.

Please notify Marge Dryden (541-490-6434) as the technical expert for the Gorge Commission.

Discovery of Human Remains

1. The following procedures shall be effected when human remains are discovered during a cultural resource survey or during construction. Human remains means articulated or disarticulated human skeletal remains, bones, or teeth, with or without attendant burial artifacts.

A. Halt of Activities. All survey, excavation, and construction activities shall cease. The human remains shall not be disturbed any further.
B. Notification. Local law enforcement officials, the local government, the Gorge Commission, and the Indian tribal governments shall be contacted immediately.
C. Inspection. The county coroner, or appropriate official, shall inspect the remains at the project site and determine if they are prehistoric/historic or modern. Representatives from the Indian tribal governments shall have an opportunity to monitor the inspection.
D. Jurisdiction. If the remains are modern, the appropriate law enforcement officials shall assume jurisdiction and the cultural resource protection process may conclude.
E. Treatment. In Oregon, prehistoric/historic remains of Native Americans shall generally be treated in accordance with the procedures set forth in ORS 97.740 to 97.760. In Washington, the procedures set forth in RCW 27.44 and 68.50 shall generally be implemented if the remains are prehistoric/historic.

   If the human remains will be reinterred or preserved in their original position, a mitigation plan shall be prepared in accordance with the consultation and report requirements specified in the "Mitigation Plans: Mitigation Plan Criteria and Information Needs" section of this chapter.

   The mitigation plan shall accommodate the cultural and religious concerns of Native Americans. The cultural resource protection process may conclude when the conditions set forth in the "Mitigation Plans: Conclusion of the Cultural Resource Protection Process" section of this chapter are met and the mitigation plan is executed.

Please be aware that RCW code requires notification of the Washington State physical anthropologist: Guy Tasa, State Physical Anthropologist, (360) 586-3534, Guy.Tasa@dahp.wa.gov.

Please notify Marge Dryden (541-490-6434) as the technical expert for the Gorge Commission.