DATE: May 26, 2011

REPLY TO ATTN OF: KEC-4

SUBJECT: Environmental Clearence Memorandum

TO: David Tripp – TEP-CSB-1

**Proposed Action:** Holcomb Radio Station and Naselle Substation Communication Upgrade Project

**Budget Information:** Work Order # 00253203 and # 00253206

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.7 “Acquisition, installation, operation, and removal of communication systems…”

**Locations:** Holcomb Radio Station: Pacific County, Washington – Township 13 North, Range 7 West, Section 30 of the Lebam Quadrangle

Naselle Substation: Pacific County, Washington – Township 10 North, Range 9 West, Section 4 of the Oman Ranch Quadrangle

**Proposed by:** Bonneville Power Administration (BPA)

**Description of the Proposed Action:** BPA is proposing to upgrade the communication equipment at BPA's Naselle Substation and Holcomb Radio Station. At both locations new microwave radio antennas would be placed on the existing communication towers and a new rack of communication equipment would be installed within both the Naselle Substation and Holcomb Radio Station control houses. At the Naselle Substation, BPA would also dig an 8 inch wide, 18 inch deep, and 25 foot long trench between the existing communication monopole and the existing ground grid conductor. Subsequently, a 4/0 Gauge copper grounding cable would be placed within the trench. All ground disturbing activities would occur within a previously graded and graveled area of BPA’s fee-owned Naselle Substation yard. No ground disturbing activities would occur at the Holcomb Radio Station.

**Findings:** BPA has determined that the proposed action complies with Section 1021.410 and Appendix B of Subpart D 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). The proposed action does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal. The proposal is not connected [40 C.F.R. 1508.25(a)(1)] to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts [40 C.F.R. 1508.25(a)(2)], and is not precluded by 40 C.F.R. 1506.1 or 10 C.F.R. 1021.211. Moreover, the proposed action would not (i) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, (ii) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities, (iii) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and Liability Act-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases, or (iv) adversely affect environmentally sensitive resources.
It was determined that no adverse effects to cultural resources would occur as a result of this project. At Naselle Substation, all proposed construction activities are limited to previously leveled and graveled land within the BPA fee-owned Naselle Substation fenceline. A letter dated April 18, 2011 was sent to the Washington Department of Archaeology and Historic Preservation (DAHP) requesting concurrence with BPA’s determination. The DAHP responded with a concurrence letter dated April 26, 2011. A cultural resource report and summary letter was also mailed to the DAHP, the Confederated Tribes of the Chehalis, Cowlitz Indian Tribe, Quinault Indian Nation, and Shoalwater Bay Indian Tribe on September 8, 2010 regarding BPA’s impacts to the Holcomb Radio Station site. A concurrence letter dated September 14, 2010 was received from the DAHP. The cultural resource department of the Cowlitz Indian Tribe expressed interest in the project prior to performing the cultural survey, but no further response was received regarding the cultural resource report and summary letter. No reply was received from the other tribes.

The project area is absent of water features, unique wildlife habitat, or other environmentally sensitive resources. Because of the previous disturbance and lack of habitat, no ESA species listed or proposed for listing are likely to be present. There would also be no effect to floodplains or wetlands. It was therefore determined that no adverse environmental effects would occur from construction of the project.

Based on the provisions identified on the attachment below this proposed action meets the requirements for the categorical exclusion referenced above. We therefore determine that the proposed action may be categorically excluded from further NEPA review and documentation.

/s/ Michael B. Henjum  
Michael B. Henjum  
Contract Environmental Protection Specialist

Concur:

/s/ Katherine S. Pierce  
Date: May 26, 2011  
Katherine S. Pierce  
NEPA Compliance Officer

Attachments:  
Provisions  
Environmental Checklist for Categorical Exclusions
Provisions

This categorical exclusion will meet the following provisions:

Cultural Resources:

1. Should archaeological materials be unexpectedly encountered during project activities, the following actions should be taken:
   - Stop work and immediately notify the COTR and a qualified archaeologist. In addition, all concerned Tribes and appropriate county, state, federal agencies should be notified.
   - Implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering.
   - Take reasonable steps to ensure the confidentiality of the discovery site.
   - Take reasonable steps to restrict access to the site of discovery.

Erosion Control and Land Use:

2. Require dust abatement on road and construction site, if necessary.

3. Appropriate erosion and sediment control best management practices will be utilized for the protection of water resources.

4. Provide a schedule of construction activities to all landowners/agencies along the corridor that could be affected by construction.

Public Health and Safety:

5. Limit construction to daytime hours for noise abatement.

6. No equipment with un-muffled exhaust is allowed. Fit all equipment with sound-control devices that are as effective as the original equipment.

7. Should contaminated media be unexpectedly encountered during construction of the project, stop work and notify the COTR. Contaminated media include materials that are potentially harmful to the environment or human health and safety. Work will proceed only after measures approved by the ODEQ are put in place to prevent the spread of contaminated materials and protect the health and safety of workers.

8. Equip vehicles with fire suppression equipment, including a shovel, fire extinguisher, and bladder or water supply.

9. Equip construction vehicles with spill containment kits able to respond to construction related spills.
Environmental Checklist for Categorical Exclusions

Name of Proposed Project: Holcomb Radio Station and Naselle Substation Communication Upgrade Project

Work Order #: 253203 and 253206

This project has been found to not adversely affect the following environmentally sensitive resources, laws, and regulations:

<table>
<thead>
<tr>
<th>Environmental Resources</th>
<th>No Adverse Effect</th>
<th>No Adverse Effect With Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Cultural Resources</td>
<td>X</td>
<td></td>
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<tr>
<td>2. T &amp; E Species, or their habitat(s)</td>
<td>X</td>
<td></td>
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<tr>
<td>3. Floodplains or wetlands</td>
<td>X</td>
<td></td>
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<tr>
<td>4. Areas of special designation</td>
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<td>5. Health &amp; safety</td>
<td>X</td>
<td></td>
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<td>6. Prime agricultural lands</td>
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<td>7. Special sources of water</td>
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<td>8. Consistency with state and local laws and regulations</td>
<td>X</td>
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<td>9. Pollution control at Federal facilities</td>
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<tr>
<td>10. Other</td>
<td>X</td>
<td></td>
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Note: Supporting documentation is in the Project file.

Signed: /s/ Michael Henjum Date: May 26, 2011