

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Eugene Region VHF Radio System Upgrades – Blue Ridge, Fairview, Kenyon

**Project No.:** P01237

**Project Manager:** Ben Younce – TEPF-CSB-2; Rian Dustan – TTBP-DITT-2

**Location:** Coos County, Oregon

**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 (BPA) is proposing to replace its aging VHF radio system at its facilities with a simple, modern, VHF two-way radio system in its Eugene VHF radio region. Field personnel use this system for communication with each other and with data control centers. The replacement would help improve voice coverage and help BPA meet its goals of safe facilities maintenance and operations, and uninterrupted power transmission. These proposed upgrades are being coordinated with similar efforts at many radio stations across BPA's service area under the "Mobile-REDI" project.

BPA proposes activities at several sites:

**Blue Ridge Radio Site** - Proposed equipment and activities include the installation of a new VHF router and network management system (NMS) term server and associated electronics and hardware in new and existing equipment racks. New racks would also include ground bars, fuse panels, and isolation kits. The existing battery system would be replaced with a new battery system on a 2-tier rack and include a spill containment tray. As a result, the existing eye wash station, junction box, and AC panel would need to be moved. A new dehydrator would be installed along with a new exhaust fan for battery operation as needed. Ground bars would be installed beneath the existing wave entry port both on the interior and exterior of the communication building. For exterior grounding, up to 5 potholes would be hand dug to a depth of 18-30 inches to replace and connect ground wires to the ground ring. Fall protection would also be upgraded by installing the MSA Latchways cable safety system on the existing communication tower and ladder. The cable would be anchored to the tower at the top and bottom by new support beams and attached along its length by new brackets. Two new 8-foot-diameter microwave antennas would be installed on the existing 30-foot tower at a height of 25 and 30 feet, leaving room for the installation of a whip antenna in the future. One antenna would complete the radio connection to Fairview Substation and the other to Kenyon Mountain Radio Site. The waveguide bridge would be upgraded and the coax cable from the new antennas would be routed through new waveguide ports to the new equipment in the building.

**Fairview Substation** – Proposed equipment and activities would include the installation of a new 60-foot 3-legged steel lattice tower southeast of the substation control building within the existing fenced yard. The tower legs would be bolted into a new 24-square-foot by 2-foot-thick concrete

slab. The new tower would include a climbing ladder with the MSA Latchways cable safety system installed. A new microwave antenna would be mounted to the new tower at 47 feet to complete the radio connection to Blue Ridge. Once the new tower and antenna are in place, the existing building mounted pole/tower and two antennas would be removed. Any existing conduit affected by the new tower placement would be re-routed around the new tower as needed. The existing sidewalk would also be reconstructed around the new tower.

A new waveguide bridge would be installed between the new tower and the existing telecommunications room in the control building. New bridge column supports would be bolted into the tower concrete slab foundation. All cables between the new antenna and new indoor equipment would use existing waveguide entry ports. Grounding would be installed for the new antenna and tower, including new ground mat, wires, and bar. Up to 5 potholes, 18-30 inches deep, would be hand-excavated underneath the waveguide entry ports for the new grounding to attach to the existing ground ring. A new rack would be installed in the telecommunications room and would house the new radio and other communication equipment. The DATS phone would be relocated within the room. A new dehydrator would be installed beneath the existing waveguide entry ports.

**Kenyon Radio Site** – Proposed equipment and activities would include the installation of a new VHF router and NMS terminal server and associated electronics and hardware in new equipment racks. BPA would upgrade the battery charger rack and batteries to new battery charger and VLA batteries. A new exhaust fan for battery operation would be installed as needed, as would a new dehydrator and gas distribution manifold. The waveguide entry panel would be updated with larger ports. Fall protection would also be upgraded by installing the MSA Latchways cable safety system on the existing communication tower and ladder. The cable would be anchored to the tower at the top and bottom by new support beams and attached along its length by new brackets. Ground bars would be installed beneath waveguide entry port both on interior and exterior of building. Ground cable would be connected to the exterior ground bar. Install additional grounds for tower, tower ladder, wave guide ladder legs, and ice bridge posts. Up to 5 potholes, 18-30 inches deep would be hand-excavated underneath the waveguide entry ports and at the tower, climbing ladder, and ice bridge for the new grounding to attach to the ground ring. BPA would remove the existing waveguide and antenna on the existing 55-foot tower and replace with a new waveguide and microwave antenna (mounted at 50 feet).

BPA would perform abatement of existing hazardous materials (batteries, lead, and asbestos) as needed before work begins at all sites. After installation, all equipment would be connected and tested. Any obsolete equipment would be removed and properly disposed of as needed.

**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.

/s/ Nancy A. Wittpenn

Nancy A. Wittpenn  
Environmental Protection Specialist

Concur:

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.

**Proposed Action:** Eugene Region VHF Radio System Upgrades – Blue Ridge, Fairview, Kenyon

## **Project Site Description**

The work would take place at existing BPA facilities that include the control house, communication buildings, towers, and supporting structures. Work would also occur in previously disturbed graveled or paved areas of facility yards. Blue Ridge and Kenyon radio sites operate as easements on private land surrounded by Bureau of Land Management-managed forested landscapes in various stages of regrowth. Fairview Substation is on BPA fee-owned property and surrounded by private rural lands, either forested, wetlands, or in agriculture use. All sites are located in the coastal range of Coos County, Oregon.

## **Evaluation of Potential Impacts to Environmental Resources**

### **1. Historic and Cultural Resources**

Potential for Significance: No

Explanation: A BPA Historian and Archaeologist reviewed the undertaking and on January 30, 2023, and determined the proposed activities would have no potential to cause effects to historic properties. Ground disturbance would occur in previously disturbed areas and minor additive features and modifications from the project would not impact the integrity of historic microwave radio stations, in this case, the Kenyon Radio Site.

### **2. Geology and Soils**

Potential for Significance: No

Explanation: All ground disturbance would be limited to the previously-disturbed graveled yard and includes excavation up to 30 inches (which is the depth of the ground mat) for the concrete foundation slabs and potholes for grounding. The potential for erosion would be very low to non-existent because sites are relatively level and best management practices would be used to cover and control excavated soil on-site, limiting soil loss.

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

Potential for Significance: No

Explanation: All work would take place indoors or within the graveled yard that is maintained to prevent plant growth.

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

Potential for Significance: No with Conditions

Explanation: In addition to common types of wildlife found in the coastal range in Coos County, two state and/or federally protected species have been documented within one mile of the Kenyon and Fairview sites. These include the Northern spotted owl (NSO) and the Pacific Marten, respectively. Aerial photography suggests that suitable habitat for NSO and marbled murrelet may exist in close proximity to the Blue Ridge and Kenyon sites. Work would be limited to the existing facilities (both indoors and outdoors within the yard). While noise generated directly at the sites (including from the exhaust fan) and/or from vehicular traffic to and from the sites could cause potential disturbance to common and/or protected wildlife species in the vicinity of the sites, the disturbance would be minimal and temporary.

To address potential effects to NSO and marbled murrelet, both listed as threatened under the Endangered Species Act, BPA completed informal Section 7 consultation with the U.S. Fish and Wildlife Service, who concurred on June 27, 2022, that the proposed action may affect, but is not likely to adversely affect both species at the radio sites. Because BPA would not remove trees or vegetation, there would be no effect to designated Critical Habitat. To avoid and minimize potential effects, BPA would schedule work during the timeframes specified below.

Notes:

- At Blue Ridge and Kenyon Mountain radio sites, the following avoidance and minimization measures apply:

The Northern Spotted Owl is sensitive to noise during the critical breeding period (March 1-July 15) when a flush response may cause nest abandonment. To eliminate the potential for disturbance to nesting owls during the critical nesting period, BPA would schedule work after July 15 and before March 1.

The Marbled Murrelet critical nesting period is April 1 to August 5. The late nesting season runs until September 15. To avoid and minimize disturbance and disruption during these periods, BPA would schedule no more than three days of construction during the critical nesting and breeding period (April 1 to August 5). In addition, for all work performed between April 1 and September 15, BPA would implement daily timing restrictions to ensure that work occurs no earlier than two hours after dawn and no later than two hours before dusk.

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

Potential for Significance: No

Explanation: Ground disturbance would be localized within existing graveled yards and/or paved areas at each facility. The potential for erosion would be very low to non-existent because sites are relatively level and best management practices would be used to cover and control excavated soil on-site, limiting soil loss. None of the facilities are in a floodplain.

## **6. Wetlands**

Potential for Significance: No

Explanation: Work would take place within existing graveled yards and/or paved areas with no potential to affect wetlands.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Ground disturbance would be localized and would not reach below the grounding mat at 30 inches below ground surface, depending on the site. No known aquifers exist in these locations.

## **8. Land Use and Specially-Designated Areas**

Potential for Significance: No

Explanation: The work would take place at existing facilities and new equipment would be similar in nature and not out of character with new or existing equipment being replaced. No change in land use would occur.

## **9. Visual Quality**

Potential for Significance: No

Explanation: At Fairview Substation, a new 60-foot 3-legged lattice steel communication tower would be built close to the control house within the fenced yard. The existing nearby 28-foot monopole/tower would be removed. Fairview Substation also has 115- and 230-kV transmission line steel structures that are taller than the new tower. The removal and replacement of the communications tower and the work at Blue Ridge and Kenyon would not be out of character with the existing utility landscape and would not constitute a substantial change in visual quality.

## **10. Air Quality**

Potential for Significance: No

Explanation: Localized, and temporary generation of emissions and dust from increased vehicular traffic and ground disturbance would occur from project activities.

## **11. Noise**

Potential for Significance: No

Explanation: Intermittent noise from construction activities and the operation of the exhaust systems at the project sites would occur. See Wildlife Section above.

## **12. Human Health and Safety**

Potential for Significance: No with Conditions

Explanation: Exposure to asbestos or lead could occur during the described work. VLA batteries would be handled during replacement. The batteries would be coupled with hydrogen detectors to monitor levels of the gas inside communication buildings. Exhaust systems are installed and operate automatically to vent hydrogen gas. Any hazardous waste or substances would be disposed of at an approved facility.

Notes: Contractors performing the work would have a current Class III Competent Person certification for asbestos operations and maintenance, and apply BPA-approved mitigation measures when cutting/drilling through potentially lead-or-asbestos-containing materials. If BPA performs any of the work, BPA Work Standards and the Safety and Health Program Handbook for such hazards would be followed.

VLA batteries would be handled during replacement. Workers would take all necessary handling precautions to prevent spill or leakage. Spills or leakage would be neutralized

using standard measures. Old batteries would be packed, shipped, and disposed of according to BPA Pollution Prevention and Abatement requirements.

A Pollution Abatement Clearance (PAC) would be completed for any disturbed yard material needing disposal off-site.

### **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: see above Human Health and Safety

**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: The BPA Realty Specialist would contact the Bureau of Land Management (Kenyon) and the private landowner (Blue Ridge) per any agreed-upon terms in the permit and easement document.

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

Signed: /s/ Nancy A. Wittpenn June 30, 2023

Nancy A. Wittpenn, ECT-4  
Environmental Protection Specialist

Date