

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Mount Hebo Communications Site – Beam Path Maintenance

**Project Manager:** Bill Merriam, TFBV-3

**Location:** Yamhill County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.3 Routine Maintenance

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to modify (cut at ground level or top) a total of 64 conifer trees that are blocking, or at risk of blocking within the next 10 years, the existing microwave beam path between the Mount Hebo and Prospect Hill communications sites.

BPA proposes to perform the following vegetation maintenance activities at Mount Hebo:

- Cut about 60 percent of the 64 conifer trees (plus or minus 15 percent, to be determined in the field by logistics and safety requirements, i.e., 38 trees plus or minus 6 trees) with a chainsaw near ground level.
- Climb and cut with chainsaws, the tops of about 40 percent of the 64 conifer trees (plus or minus 15 percent, i.e., 26 trees plus or minus 4 trees) at variable heights, but no less than 20 feet tall, to retain diverse vertical wildlife habitat and snag features.
- Lop and scatter the cut tree material by hand within the local forested habitat areas to depths no greater than 18 inches tall to avoid fuel loading.
- Use a woodchipper to break-down limbs and tree debris into small pieces and scatter on-site across the forest floor, avoiding dispersal into meadow habitats.

Large tree trunks would not be drug across the landscape. No heavy logging equipment, helicopters, winches, or dragging/skidding equipment would be used. The woodchipper and work trucks would remain on existing paved or gravel access road surfaces. The project is expected to last no longer than three days.

**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.

Becky Hill  
Environmental Protection Specialist

Concur:

Sarah T. Biegel  
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:** Mount Hebo Communications Site – Beam Path Maintenance

## **Project Site Description**

The 0.4-acre project site is located on Mount Hebo, at about 3,150 feet above sea level, in the northern Coast Range of Oregon. Mount Hebo is about 10 miles east of the Pacific Ocean, about 40 miles northwest of Salem, and is located on lands administered by the U.S. Department of Agriculture, Forest Service (USFS), Siuslaw National Forest. The Mount Hebo area of the Siuslaw National Forest is comprised of dense forest stands of second growth western hemlock and Douglas-fir. Nine meadows, spanning a two-mile-long ridgeline, total about 65-acres of distinct meadow habitat on Mount Hebo. A communications complex, including the BPA Mount Hebo communications site, is located along the eastern edge of one of the meadows (near the summit). No freshwater designated critical habitats are located within one mile of the project site. However, three un-named headwater streams of Three Rivers are located downslope and over 600 feet south of the project site. A 0.5-acre wetland associated with one of the headwater streams is located about 1,900 feet away from the project site.

Mount Hebo has hiking and equestrian trails, lakes for boating and kayaking, and a campground. Near the north end of the communications complex, there is an informal visitor area with a Mount Hebo Air Force Station interpretive kiosk describing the history of the site.

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

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

Potential for Significance: No with Conditions

Explanation: The BPA archaeologist reviewed the proposed actions and coordinated with the USFS's archaeologist in late 2023 and early 2024. The USFS initiated Section 106 consultation with the Confederated Tribes of the Grand Ronde Community of Oregon (CTGR) and the Confederated Tribes of Siletz Indians on January 9, 2024. The initiation of consultation letter included a description of the USFS's intention to exercise an existing Programmatic Agreement for the proposed tree modification and vegetation maintenance work. The CTGR responded on January 31, 2024, with no concerns. The Confederated Tribes of Siletz Indians did not provide a response. BPA adopted USFS's Section 106 consultation for the proposed action, and determined no adverse effect to historic properties would result from the proposed undertaking.

#### Notes:

- A Post Review Discovery Procedure form with contact information for the BPA cultural resources lead would be supplied to the contractor prior to commencing work. Should any cultural resources be discovered during project activities, then all project work must stop in the area, and the cultural resources lead should be notified immediately.

## 2. Geology and Soils

Potential for Significance: No

Explanation: The soil at the project site is highly fertile, with a deep, un-compacted humic layer. No excavation activities are proposed, and no large tree trunks would be drug across the landscape. The 0.4-acre work area would be accessed on foot, and the woodchipper would stay on paved or gravel access road surfaces. Therefore, no soil disturbance is anticipated beyond minor, superficial surface soil movement from foot traffic and lopping and scattering tree limbs and debris by hand.

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

Potential for Significance: No with Conditions

Explanation: About 63 Douglas-fir (*Pseudotsuga menziesii*) trees and about 1 western hemlock (*Tsuga heterophylla*) tree would be modified (cut at ground level or topped). Understory vegetation nearby may be temporarily disturbed or damaged during project activities, including, but limited to, the following species: Oregon grape (*Berberis aquifolium*), elderberry (*Sambucus spp.*), red-flowering currant (*Ribes ssanguineum*), red huckleberry (*Vaccinium parvifolium*), sword fern (*Polystichum munitum*), bracken fern (*Pteridium aquilinum*), western trillium (*Trillium ovatum*), and native and non-native grasses and herbaceous ground cover plants.

The Coast Range fawn lily (*Erythronium elegans*), a Federal Species of Concern, a USFS Siuslaw National Forest Sensitive Species, and a state-listed Threatened species in Oregon, has been documented at various open-canopy locations across Mount Hebo during vegetation surveys, but has not been detected in the 0.4-acre project site.

Additionally, the early blue violet (*Viola adunca*), a common species that serves as a host plant for the federally-listed Oregon silverspot butterfly (*Speyeria zerene hippolyta*), has been documented in the meadow habitat located immediately northwest of the 0.4-acre project site. However, early blue violets have not been detected at the project site.

Vegetation surveys did not detect any federally-listed Endangered Species Act (ESA)-listed plant species. Native and non-native plant species may be damaged or temporarily crushed during project activities. However, due to the relatively small area of vegetation disturbance compared to the surrounding forest habitat, relatively short duration of project activities (about three days), and temporary nature of understory vegetation disturbance from lopping and scattering tree material, impacts to vegetation would be low.

### Notes:

- All equipment and vehicles (including, but not limited to passenger vehicles, work trucks, work boots and pant leg cuffs that may harbor weed seeds) would be inspected for cleanliness at the base of Mount Hebo Road ([NF-14] at intersection with Highway 22) by a BPA-designated environmental monitor. Equipment and vehicles must be free of plant material, mud, and debris that may harbor weed seeds and vegetative materials, and other foreign materials to avoid introduction or spread of non-native species to Mount Hebo. Vehicles and equipment that fail the inspection would be denied access on Mount Hebo Road (NF-14) and would be cleaned by the contractor before returning for reinspection.
- Contractors would avoid all meadow habitats, and only access the beam path work area on foot and from the gravel access road (NF-14) located downhill and to the southeast of the work area.
- Woodchipper and vehicles would not leave paved or gravel access road surfaces.
- Downed logs would not be drug or skid across the forest floor, to the maximum extent possible, so to minimize soil and understory vegetation disturbance.

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

Potential for Significance: No with Conditions

Explanation: The marbled murrelet (*Brachyramphus marmoratus*) and the northern spotted owl (*Strix occidentalis caurina*), federally-listed species under the ESA, have the potential to occur at Mount Hebo. Both species have designated critical habitat at Mount Hebo near the communications site. The Oregon silverspot butterfly, also a federally-listed species, is known to occur at Mount Hebo in meadow habitats. The Oregon silverspot butterfly does not have designated critical habitat at Mount Hebo.

In accordance with Section 7 of the ESA, BPA requested formal consultation for the Mount Hebo communications site redevelopment project with the USFWS, and received a Biological Opinion (BiOp) on November 2, 2020 (TAILS: 01EOFW00-2021-F-0046). The BiOp concurred with BPA's May Affect, Not Likely to Adversely Affect determination for the marbled murrelet. It also concurred with the No Adverse Modification determination for designated critical habitats for the marbled murrelet and the northern spotted owl. The BiOp concluded that the proposed action would not jeopardize the continued existence of the Oregon silverspot butterfly, so long as reasonable and prudent measures, and terms and conditions, described in the BiOp are met.

BPA submitted a summary of the proposed beam path activities to USFWS on September 6, 2023, and updated BPA's initial No Effect determination for the northern spotted owl, to a May Affect, Not Likely to Adversely Affect determination. BPA also made a No Effect determination for the Pacific marten, which was federally-listed after the BiOp was issued.

USFWS returned an amended BiOp on September 28, 2023, that concurs with BPA's updated determination for the northern spotted owl and finds BPA's No Effect determination on the Pacific marten to be a reasonable conclusion.

Ambient noise levels at the project site are relatively quiet. Tree cutting, lopping, and scattering activities may temporarily disturb wildlife in the local area; however, they are expected to return to the area upon project completion. General wildlife species (e.g., birds, squirrels) currently using the trees to be modified would likely relocate to adjacent forest habitats.

With implementation of the minimization measures listed below, which is consistent with the amended BiOp, the proposed project would have a low impact on state-listed, special-status, or federally-listed ESA wildlife species.

##### Notes:

- See the Plants section above for details on equipment and vehicle inspection requirements.
- Contractors must complete environmental training provided by a BPA-designated environmental monitor. Contractors who have not successfully completed the environmental training would not be allowed to work onsite.
- Prior to commencing tree work, a BPA-designated environmental monitor would install temporary, highly-visible flagging and a "Sensitive Area – No Access" at the northwest extent of the project site to prevent access into the meadow habitat.
- The contractor would access the beam path work area from the gravel access road (NF-14) located downhill and to the southeast of the work area and would not traverse through meadow habitats.
- Tree cutting work would occur between October 1 and March 1 to avoid critical butterfly flight periods and bird breeding seasons.
- Should the contractor require access to the work site between July 1 and September 30, vehicle speeds would not exceed 5 mph in roadway sections that are adjacent to open meadow habitat, to avoid colliding with butterflies in flight.

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

Potential for Significance: No

Explanation: The project area 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: The project does not have the potential to impact groundwater or aquifers. Therefore, the proposed action would not impact groundwater or aquifers.

## 8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The proposed beam path maintenance work is located in an area that would not interfere with recreationalists using horse trails, hiking trails, or the campground. The narrow, one-lane wide, gravel access road (NF-14) may be temporarily closed to vehicles for safety concerns. However, the temporary closure and delay to travelers would be short in duration. A detour route may be available if recreationalists are seeking to access South Lake.

The BPA beam path is located parallel to a cleared beam path for a nearby communications site. The BPA beam path is located within a USFS-designated Scenic Biological Special Interest Area. The communications complex is managed by the USFS through the Mount Hebo Communications Site Management Plan (dated October 1, 2023), which takes into consideration the USFS's guidelines for managing the Special Interest Area.

Furthermore, the visitor area with the Mount Hebo Air Force Station interpretive kiosk near the north end of the communications complex would not be impacted by the proposed action.

Therefore, the proposed action would be consistent with the existing land use and special designation of the site.

### Notes:

- BPA's Realty Specialist is coordinating with the Siuslaw National Forest's Special Uses and Lands Program Manager to update the existing USFS-BPA Land Use Agreement for the Microwave Beam Path.

## 9. Visual Quality

Potential for Significance: No

Explanation: About 64 conifers trees would be modified within an existing beam path located in forest habitat. While about 48 trees would be cut at ground level, some would be left as snags which would retain some visual quality within the beam path corridor. The beam path is located up a steep hill from the gravel road, so it would be minimally visible to people passing through this area along the narrow road. The surrounding area is intact, mature forest habitat. The proposed action would have no significant impact on the visual quality of the area.

## 10. Air Quality

Potential for Significance: No

Explanation: There may be a small amount of vehicle emissions and chainsaw exhaust during project activities; however, the proposed action would have no significant impact on air quality.

## 11. Noise

Potential for Significance: No

Explanation: Chainsaws and a woodchipper would elevate noise levels above current ambient conditions. However, the noise impacts would be temporary and intermittent. The proposed action would not result in long-term change in ambient noise levels at the site. The proposed action would have no significant noise impact.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: The proposed work would not occur on Federal holidays or weekends to reduce potential impacts to the public. There is a risk to human health and safety due to the inherent risk of climbing trees, cutting and falling trees, and working with chainsaws. A safety plan would be prepared prior to performing the tree modification work. The plan would include a fire prevention and suppression plan, guidance on climbing up trees, operating chainsaws at above ground elevations in a tree as well as on the ground, detailed information on how to respond to emergency situations, and guidance on safe distances for personnel working on the ground with falling tree material, and other safety practices.

Mount Hebo is a popular recreation area. All standard safety protocols would be followed during project activities to minimize risks to construction workers and members of the public potentially recreating at the site, including, but not limited to road flaggers and safety watchers to alert the public of the tree cutting activities and schedule that may potentially impact the users experience; therefore, project activities would not 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**

Description: BPA Realty, Forestry and environmental compliance personnel coordinated with the USFS Siuslaw National Forest. By implementing the conservation measures described above, the proposed action would be consistent with the USFS's Mount Hebo Communications Site Management Plan and Scenic Biological Special Interest Area.

BPA will notify the Siuslaw National Forest of the beam path work dates so they may communicate with recreationalists of the potential, temporary disturbance and/or detour.

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

Signed:

Becky Hill  
Environmental Protection Specialist