

# Radio System Upgrades at Willow Creek Summit and Windy Devil Annex

## Finding of No Significant Impact

Bonneville Power Administration  
DOE/EA-2092  
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### INTRODUCTION

Bonneville Power Administration (BPA) announces its environmental findings for the Radio System Upgrades at Willow Creek Summit and Windy Devil Annex Project (the “project”). The project would construct two communication stations on public lands managed by the U.S. Bureau of Land Management (BLM)-Challis Field Office (BLM-Challis) and the U.S. Forest Service (USFS) Salmon-Challis National Forest (SCNF) Lost River Ranger District located in Custer County, Idaho.

BPA and the BLM as co-lead agencies prepared an environmental assessment (EA) evaluating the Proposed Action and the No Action Alternative. The EA was released for a 30-day public comment period in June of 2021. One comment was received and responses to the comment are included in the Final EA. The Final EA also identifies changes made to the Draft EA.

Based on the analysis in the EA, BPA has determined that the Proposed Action is not a major federal action significantly affecting the quality of the human environment as defined by the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*). Therefore, the preparation of an environmental impact statement (EIS) is not required and BPA is issuing this Finding of No Significant Impact (FONSI) for the Proposed Action. The Proposed Action is not the type of action that normally requires preparation of an EIS and is not without precedent.

Attached is a Mitigation Action Plan (MAP) that lists all the mitigation measures that BPA, Custer Telephone, Incorporated – its partner in development of the Willow Creek Summit site — and contractors are committed to implementing. The FONSI also includes a statement of findings on how the Proposed Action impacts wetlands and floodplains. Impacts to wetlands and floodplains would be avoided.

### PUBLIC AVAILABILITY

This FONSI and attached MAP will be mailed directly to individuals who previously requested a copy; a notification of availability will be mailed to other potentially affected parties; and the Final EA, FONSI and MAP will be posted on BPA’s project website:

<http://www.bpa.gov/goto/WillowCreekWindyDevil>

## **PROPOSED ACTION**

Under the Proposed Action, BPA would upgrade its very high frequency (VHF) two-way radio coverage in the Idaho Falls VHF Radio Region of its transmission infrastructure territory. Two communication stations would be developed under this plan: the Willow Creek Summit on BLM-managed land in BLM-Challis and the Windy Devil Annex on USFS-managed land in the Lost River Ranger District of the SCNF.

Both sites would have many common activities and features, which would include existing access roads that would be subject to minor improvements, graded and graveled entrances from the existing access roads, and small graveled parking/turnaround areas. Both sites would also include underground electrical spur lines that would be installed to provide power to the communication stations (a distance of 220 feet at Willow Creek Summit and 1,600 feet at Windy Devil Annex). The stations would also include fully housed backup propane-powered generators. 30-foot-square concrete tower foundations with 100-foot-tall steel lattice towers would be constructed in the graveled station yards for both sites. To facilitate this work, some vegetation removal and temporary staging areas would be required for the construction of the radio facilities.

At Willow Creek Summit, a new fiber optic line would be buried along the full length of the existing access roads. The Willow Creek Summit location would include an approximately 35-foot by 24-foot communication building to house the BPA radio operation systems, and an adjoined, approximately 24-foot-square, generator building for a total building area of 1,416-square-feet. Two 3,000 gallon and one 1,000 gallon propane tanks would be installed. Staging areas would occupy about 1.5 acres temporarily.

At Windy Devil Annex, roadwork would also include re-routing of a hairpin turn to allow for large construction vehicle movement. The communication station would include a 1,000-square-foot communication building to house BPA radio operations and the generator room. Two 2,000-gallon propane tanks would be installed, and temporary staging would occupy about 0.4 acres.

## **NO ACTION ALTERNATIVE**

Under the No Action Alternative, BPA would not expand the existing Willow Creek Summit Communications Site with a new radio station and tower facilities, and BPA would not construct the Windy Devil Annex Communication Station. Because construction activities associated with the Proposed Action would not occur, it would be necessary to conduct periodic routine and emergency maintenance at the existing Windy Devil Communication Station to ensure it continues to function within the larger BPA communications network.

The equipment would continue to be outdated, and the reliability and safety concerns that prompted the proposal for action would persist. BPA would not be able to meet North American Electric Reliability Corporation (NERC) communication system standards. Because BPA would not have reliable communications between field staff and dispatch, BPA would not be able to meet their contractual and statutory obligations (see Chapter 1, Section 1.2 of the EA)., BPA would need to seek alternative communications solutions.

If the No Action Alternative were selected, project planning would need to be re-initiated in order to accomplish the goal of the Radio System Upgrades at Willow Creek Summit and Windy Devil Annex: modernize to a more reliable system to process voice data originating from transmission system field personnel in mountainous terrain, and continue to meet NERC standards. It is

assumed two new locations would need to be identified and vetted for radio station development.

### **SIGNIFICANCE OF POTENTIAL IMPACTS OF THE PROPOSED ACTION**

To determine whether the Proposed Action has the potential to cause significant environmental effects, BPA analyzed the potential impacts of the proposal on human and natural resources and presented them in Section 3 of the EA. Not all of the resources present in the project areas would be affected by the alternatives because there would be either no or only an extremely small, insignificant impact on the resource from the project. Because these resources would not be affected by the proposed project, they were not evaluated further in the EA.

To evaluate potential impacts from the Proposed Action, four impact levels were used – high, moderate, low and no impact. High impacts could be considered significant impacts if not mitigated, while moderate and low impacts would not. The potential impacts associated with the Proposed Action are summarized below. The Proposed Action, with implementation of selected mitigation measures, would have no significant impacts. The following discussion provides a summary of the Proposed Action’s potential impacts and the reasons these impacts would not be significant.

### **RESOURCE DISCUSSION**

#### **Soils**

Impacts on soils would be moderate in the short term and low to moderate in the long term.

#### Willow Creek Summit

- Construction activities for installation of the fiber-optic line and electric utility service connection line would temporarily disturb about 0.5 acres of soil that would be revegetated. Construction of the communication station would result in about 0.5 acres of soil that would be permanently covered by structures or other impervious surfaces.
- Best Management Practices (BMPs) to decrease the potential for erosion include preparation of a Stormwater Pollution Prevention Plan (SWPPP), revegetation of disturbed areas, and graveling areas around the buildings.

#### Windy Devil Annex

- Construction activities at the Windy Devil Annex, would result in about 0.8 acres of soil that would be permanently covered by structures (0.5 acres) or converted to the access road (0.3 acres), and 0.1 acres temporarily disturbed by access road construction.
- BMPs would be the same as those proposed for Willow Creek Summit.

#### **Vegetation**

Impacts on vegetation would be low to moderate in the short term and low in the long term.

#### Willow Creek Summit

- Construction activities for installation of the fiber-optic line and the communication station would result in about 3.3 acres of temporary disturbance and 0.5 acres of permanent disturbance to vegetation.
- Invasive and noxious weeds occur where construction activities would take place, particularly along access roads. BPA would thoroughly clean all vehicles used in the construction, maintenance and operations of the project prior to moving equipment across or onto BLM/USFS-managed lands. Use high-pressure washing or other effective method would be used to clean vehicles. Disturbed areas would be revegetated with BLM approved native seed mixes to prevent further spread of weeds.
- A potential (identification was not conclusive) whitebark pine is located off the existing access road where no improvements are proposed and would not be directly affected.
- No other Threatened, Endangered, and Sensitive plants were found during the 2018 survey of the project area

### Windy Devil Annex

- Construction activities for the communication station would result in about 0.5 acres of temporary disturbance and 0.8 acres of permanent disturbance to vegetation.
- Action to be taken to prevent the spread of invasive and noxious weeds would be the same as those proposed for the Willow Creek Summit site.
- Up to three potential whitebark pine trees would be removed, but the project would not substantially contribute to key threats to whitebark pine and would not be detrimental to the local population. The BPA and BLM determination is that the project would not be likely to jeopardize the continued existence of whitebark pine. There were approximately 455 individual USFS-Sensitive Welsh's buckwheat plants found during a 2017 survey of the existing Windy Devil Communications Site, and the planned Windy Devil Annex communication station. Of these, only three isolated individual plants in the construction zone would be likely to be damaged or destroyed.
- No other Threatened, Endangered, and Sensitive (TES) plants were found during the 2018 survey of the Windy Devil Annex.

### **Wildlife**

Impacts on wildlife would be low to moderate in the short term and low in the long term. Impacts on TES animals would be low in the short term and low in the long term.

### Willow Creek Summit and Windy Devil Annex

- Construction activities would impact general wildlife, and BLM and USFS sensitive and Management Indicator Species (MIS) animals through removal of habitat, potential incidental mortality from collisions with construction equipment, and temporary displacement due to increased noise and human presence during construction activities.
- Construction noise and activity levels would be temporary, and wildlife would be expected to return after construction is complete.
- Construction activities would not occur during the elk winter range closure period at Willow Creek Summit.
- Re-vegetation of temporarily impacted areas, noxious weed control to limit habitat degradation, application of speed limits that reduce the likelihood of wildlife/vehicle

collisions, and efforts to avoid a project-related wildfire would reduce the long-term impact to wildlife habitat.

- Implementation of the USFWS recommended BMPs for communication towers would help avoid and minimize adverse effects to migratory birds.
- The project would have no effect to Endangered Species Act-listed and proposed animals.
- Minor greater sage-grouse Priority Habitat Management Area habitat loss is anticipated and no direct mortality or breeding disturbance is anticipated due to project timing and distance to the nearest lek. The BLM-Challis Field Office and the BLM Idaho State Office found that the project would be in conformance with the greater sage-grouse Approved Resource Management Plan Amendment (ARMPA) of 2015.

## **Visual Resources**

### Willow Creek Summit

Impacts on visual resources would be moderate in the short term and moderate in the long term.

- The Willow Creek Summit facilities would not be in conformance with the BLM Visual Resource Management (VRM) Class II objectives established for the Willow Creek Summit area; however, the project would not change the scenic quality of the area as a whole.
- The existing communication facility at Willow Creek Summit contains many of the same elements as the proposed project facilities at the location and has already altered the form, line, color, and texture of the landscape. Buildings at the Willow Creek Summit site would have design components (such as paint color, screening, and low profile components) to blend with the background. Project facilities would not result in additional impacts to the scenic quality at the local level.

### Windy Devil Annex

Impacts on scenic quality, would be low in the short term and low in the long term

- The Windy Devil Annex facilities would be consistent with the Challis National Forest Plan (1987) visual quality objective of partial retention for the area where the Windy Devil Annex would be built.

## **Cultural Resources**

Impacts on cultural resources would be low in the short term and low in the long term.

### Willow Creek Summit

- Trenching fiber conduit underneath the linear cultural resource, U.S. Highway 93, would not adversely affect the site and would not impact the characteristics that make the roadway eligible for listing in the National Register of Historic Places (National Register).
- A precontact lithic scatter that is recommended eligible for listing in the National Register would be avoided. The site would be flagged and marked as an avoidance area prior to construction activities and a cultural monitor would be present during construction near the site.

- Construction activities could result in disturbance to unknown cultural resources through accidental discovery. Use of design features, mitigation measures, and BMPs would ensure that any previously undiscovered resources found would be managed properly and would minimize any inadvertent disturbance or destruction of cultural resources from the construction of the Willow Creek Summit Communication Station.

#### Windy Devil Annex

- The historic cultural resource Horseshoe Mine and Taylor Homestead, determined eligible for listing in the National Register would be avoided. The site would be marked on construction documents and maps as an avoidance area, and as needed, would be marked in the field by a cultural monitor.
- Construction activities could result in disturbance to unknown cultural resources through accidental discovery. Use of design features, mitigation measures, and BMPs would ensure that any previously undiscovered resources found would be managed properly and would minimize any inadvertent disturbance or destruction of cultural resources from the construction of the Windy Devil Annex Communication Station.

#### **Socioeconomics**

Impacts on socioeconomics, would be beneficially low in the short term and there would be none in the long term.

#### Willow Creek Summit and Windy Devil Annex

- Project construction at Willow Creek Summit and Windy Devil Annex would employ up to eight workers at each site during the construction period lasting 5 to 6 months. If local construction workers are hired to complete the work this would result in an increase of 21 percent in the number of construction jobs in Custer County.
- An estimated 5 to 10 percent of total project costs would involve local purchases of fuel, vehicle parts, and other goods and services in Custer County.
- The operation and maintenance of the communication stations would not result in the creation of new jobs or services in Custer County.

#### **Noise**

Impacts of noise would be moderate in the short term and low in the long term.

#### Willow Creek Summit and Windy Devil Annex

- Construction would cause temporary and intermittent noise as construction progresses, with anticipated noise levels reaching 80 to 89 dBA, the typical range of a construction site from a listening distance of 50 feet.
- Construction would only occur during daytime hours thereby greatly limiting the potential for disturbance to local populations.
- Noise from heavy equipment and truck traffic and increased worker trips would temporarily add to existing noise on local roads and highways but would not cause a substantial increase in average traffic noise levels.
- During operation, backup power generators would be tested regularly resulting in approximately one hour of continuous combustion engine noise once each month.

## **FLOODPLAIN AND WETLAND STATEMENT OF FINDINGS**

Construction of the project would not result in impacts to floodplains and wetlands. The Willow Creek Summit and Windy Devil Annex sites are located on high mountain ridgelines that do not support floodplain or wetland features. Access roads to the proposed radio facility sites do not cross National Hydrologic Dataset streams or wetlands mapped under the National Wetland Inventory. Field visits to the proposed radio facility sites have verified that no wetlands or floodplains are present.

## **DETERMINATION**

Based on the information in the EA, as summarized here, BPA determines that the Proposed Action is not a major federal action significantly affecting the quality of the human environment within the meaning of NEPA (42 USC 4321 *et seq.*). Therefore, an EIS will not be prepared and BPA is issuing this FONSI for the Proposed Action.

Issued in Portland, Oregon.

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