

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Activities to Operate and Maintain High Voltage Electrical Facilities through 2030

Project Manager: Multiple

Location: Multiple locations in Idaho, Oregon, Washington, Montana, California, Nevada, Utah, and Wyoming

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B1.3 Routine maintenance; B1.4 Air conditioning systems for existing equipment; B1.7 Electronic equipment; B4.6 Additions and modifications to transmission facilities; B5.6 Oil spill cleanup

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to conduct activities listed below to operate and maintain high voltage electrical facilities throughout the BPA service territory. Electrical facilities would include, but are not limited to, control houses, substations, and switch yards. These activities would include the following:

- Repair, removal, replacement, or addition of substation equipment, and switch yard equipment, including but not limited to transformers, breakers, bushings, capacitor banks, voltage regulators, circuit switches, reactors, regulators, wave traps, radiators, circuit breakers, re-closers, disconnect switches, valves, wiring, lightening arrestors, buses, and communication equipment, including fiber optics equipment, and any associated foundations. Equipment removal and additions must comprise less than 50 percent of the existing equipment within the yard, as measured by, square footage of all the equipment within the yard.
- Repair, removal, replacement, or addition of fiber optics supporting substation or switch yard equipment repair, removal, replacement, or addition activities. Activities falling under this class of action could include removing, replacing, or installing new fiber optic cable and conduit within the control house or yard and minor alteration of existing holes in the exterior building wall, when needed, to accommodate the new size or shape of the fiber optic conduit.
- Remove, replace, upgrade, and/or modify electronic equipment required for operation and maintenance of BPA's transmission grid and supporting substation or switch yard equipment repair, removal, replacement, or addition activities. Several types of actions involving communications, meters, relays, Remedial Action Scheme (RAS), and Supervisory Control and Data Acquisition (SCADA) system upgrades would fall into this class of actions. Activities could include removal of old equipment, installing new equipment racks, new cabinets, phone systems, radios, meters, disconnects, switches, inter- and intra-net equipment, and associated wiring.
- Modify HVAC systems to accommodate electronic equipment installation. Activities falling under this class of action could include: removing or replacing HVAC equipment with new

equipment installed in the same location or within 5 feet of the previous location; widening existing holes or cutting holes in the exterior building wall near the existing HVAC equipment to accommodate the new size or shape of the replacement equipment; installing new concrete pads for exterior HVAC units; replacing solar panels; and installing, removing, or replacing duct work, wiring, and other electrical related equipment inside the building or facility.

- Maintenance and testing of equipment, including oil change outs.
- Maintenance, replacement, removal, or addition of aboveground or belowground storage tanks (excluding oil house storage tanks) and associated components.
- Maintenance, replacement, removal, or addition of an engine generator (EG) unit and associated components (including EG enclosure) that were installed after 1974.
- Maintenance, repair, replacement, or addition of ground mats.
- Maintenance, removal, replacement, and new installation of the storm water drainage treatment systems and precast concrete trenches.
- General yard work such as removal of contaminated soil, trenching, digging, removal of spoils, and replacement of yard rock.

These actions would occur in existing high voltage facilities situated on both BPA fee-owned land and land where BPA possesses an agreed upon easement with the landowner. These actions would not require major exterior building modification (*e.g.*, removing or replacing windows or doors, cutting new wall holes in new locations) and would not require major interior building modifications (*e.g.*, tearing out walls). The facilities would be accessed using BPA's existing access road system and no access road improvements or reconstruction would be required.

General equipment used for yard work would include cranes, excavators, bulldozers, dump trucks, vacuum trucks, and substation maintenance vehicles. No excavation activities would extend beyond the perimeter previously disturbed during construction and installation of the substation or switch yard. Any activities that involve hazardous materials, such as contaminated soil removal, would be disposed of at a designated hazardous waste facility.

Each project would be reviewed by the BPA NEPA lead to ensure that the activities fall within the range of those described in this Categorical Exclusion prior to initiating work.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

Findings: In accordance with Section 1021.102 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; 89 FR 34074, April 30, 2024; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and *DOE National Environmental Policy Act (NEPA), Implementing Procedures* (dated June 30, 2025), BPA has determined the following:

- 1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
- 2) The proposal has not been segmented to meet the definition of a categorical exclusion;
and
- 3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.¹

Jeremy Doschka
Environmental Protection Specialist

Concur:

Katey Grange
NEPA Compliance Officer

Attachment(s): Environmental Checklist

¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to the interim final rule to revise DOE NEPA regulations implementing NEPA at 10 C.F.R. Part 1021 and NEPA Implementing Procedures (dated June 30, 2025), to meet its obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

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: Activities to Operate and Maintain High Voltage Electrical Facilities through 2030

Project Site Description

Electrical facilities are located in BPA's service territory, including Idaho, Oregon, Washington, western Montana and small parts of eastern Montana, California, Nevada, Utah, and Wyoming. Project sites consist of existing high voltage electrical facilities where the underlying ground has been previously altered. During the original site development and construction, several feet of soil were excavated to a specific depth, a ground mat was installed, and the area was covered or filled with select fill material and compacted to bring the surface to the appropriate grade. Electrical facilities are surrounded by fencing and bare-ground conditions are maintained in the yards.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: BPA Cultural Resources staff has determined that the proposed undertaking meets the applicability of the Programmatic Agreement Among the Bonneville Power Administration, the Idaho State Historic Preservation Office, the Montana State Historic Preservation Office, the Oregon State Historic Preservation Office, the Washington State Historic Preservation Office, and the Advisory Council on Historic Preservation to Implement the Bonneville Power Administration Manual for Built Resources (executed July 15, 2025). Section 106 consultation was completed pursuant to Stipulation I.D.

2. Geology and Soils

Potential for Significance: No

Explanation: Operation and maintenance activities would not create substantial new impacts to geology or soil as existing yards were previously disturbed during yard construction. Spoils from excavations for installation/removal of equipment or spill cleanup would be disposed of according to all local, state, and Federal regulations.

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

Potential for Significance: No

Explanation: There is no vegetation in the yards; therefore, the activities would not impact any vegetation, including Federal or state special-status species or habitats. There would be no effect to ESA-listed species.

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

Potential for Significance: No

Explanation: The proposed activities would not require habitat removal or disturbance. Minor, intermittent noise associated with project activities has the potential for temporary disturbance to nearby wildlife species. In those locations containing nesting sensitive Federal or state bird species (e.g., bald and golden eagles), timing restrictions would be employed to minimize nest disturbance. For the majority of activities, there would be no

effect to ESA-listed species in the area. In locations adjacent to BPA substations or switch yards where ESA-listed wildlife species are known to occur, established measures or timing restrictions would be implemented, as appropriate, so that activities would either have no effect on ESA-listed wildlife species, or be in accordance with agreed-upon conservation measures, terms, and conditions of a completed ESA Section 7 consultation with the Services.

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

Potential for Significance: No

Explanation: The proposed activities would not require in-water work. Appropriate Best Management Practices (BMPs) would be utilized to keep sediment from entering waterways.

6. Wetlands

Potential for Significance: No

Explanation: The proposed activities would not require wetland work. Appropriate BMPs would be utilized to keep sediment from entering wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Spill prevention measures would be utilized during project activities. No groundwater or aquifers would be impacted by the activities.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: No change in land use would occur and activities would not impact land use.

9. Visual Quality

Potential for Significance: No

Explanation: The activities would have minimal impacts to visual quality and the results would remain consistent with the existing surroundings of the electrical facility.

10. Air Quality

Potential for Significance: No

Explanation: The activities may generate a small amount of vehicle emissions and dust during construction. Existing facility emissions may slightly increase or decrease according to equipment installed or removed. These changes would not significantly alter the emission profile of BPA facilities.

11. Noise

Potential for Significance: No

Explanation: Project length may vary greatly from a number of days to several months, depending on the scope work. Some temporary construction/activity noise would occur during daylight hours. Newly installed yard equipment may minimally raise the overall operational noise of the existing substation or switch yard.

12. Human Health and Safety

Potential for Significance: No

Explanation: BPA's standard safety protocols minimize the potential for activities to impact human health or safety. All materials would be disposed of at approved facilities in compliance with local, state, and Federal regulations.

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: Electrical facilities may contain known environmental, safety, and health hazards, as well as hazards that may be unique to the facility, equipment, or the type of work being performed. Implementing BPA's established environmental, safety, and health standards and procedures would minimize the potential for violations of statutory, regulatory, or permit requirements.

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: Electrical facilities may contain hazardous substances, and petroleum products that are used to operate and maintain electrical equipment. Because these substances and products are managed, stored, transported, and disposed of in accordance with established BPA policies and procedures as well as local, state, and Federal regulations, the risk of uncontrolled or unpermitted releases is minimal.

Additionally, pre-existing pollutants and contamination may be present within the fenced area of electrical facilities; however, it is unlikely that these materials would be disturbed in such a way that an uncontrolled or unpermitted release would result. If contamination is found or suspected, BPA would determine the nature and extent of contamination and remove the contaminated material until applicable cleanup standards are achieved. Contaminated material would be disposed of at approved facilities, in accordance with local, state, and Federal regulations. Clean fill would be imported to restore the original grade.

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: At facilities that are not BPA fee-owned, all activities would be coordinated with non-BPA utilities or landowners prior to beginning work. If activities would potentially impact adjacent landowners, BPA would notify and coordinate with them as needed.

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

Signed:

Jeremy Doschka
Environmental Protection Specialist