

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Ostrander Substation Control House HVAC Replacement

Project Manager: Christopher Ross, NWMS-1

Location: Clackamas County, Oregon

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B1.4 Air conditioning systems for existing equipment

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to replace the rooftop heating, ventilation, and air conditioning (HVAC) system at BPA's Ostrander Substation control house in Clackamas County, Oregon. The existing HVAC system has exceeded its useful service life and would be replaced by a modern and more energy efficient HVAC system.

The control house currently has an existing rooftop HVAC system which would be replaced by a ground-based system. Existing equipment, including basement units, ductwork, outdoor units, and associated equipment not compatible with the new HVAC system would be removed and disposed of at an appropriate offsite location. A 10 foot by 16 foot raised concrete pad and grounding loop would be excavated approximately 2 feet deep on the west side of the control house for the outdoor HVAC equipment. Bollards would be placed 4 feet apart around the pad to protect the exterior ground-level equipment. Connections from the outdoor pumps to the control house would be routed through minimally invasive new wall penetrations. Exterior line covers would be painted to match the existing control house color. A new roof vent would be installed to accommodate the new units, and an additional indoor fan unit would be added to serve non-critical spaces. Equipment staging would occur on graveled or paved areas within the substation's footprint. Construction equipment would include trucks, an excavator, and common construction tools.

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

Justin M. Olmsted
Environmental Protection Specialist

Concur:

Katey C. 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 Evaluation

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: Ostrander Substation Control House HVAC Replacement

Project Site Description

The project would occur at BPA's Ostrander Substation on BPA fee-owned property in Clackamas County, Oregon (Township 2 South, Range 3 East, Section 26). All proposed actions, including equipment and material staging, would occur within the existing footprint of the fenced substation which has been heavily disturbed and consists of electrical yard rock and paved surfaces. No wetlands or water bodies are present within 500 feet of the project site. Land use surrounding the substation is primarily rural and agricultural, with scattered tree stands interspersed throughout the properties.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and implementing regulations 36 CFR 800, BPA initiated consultation with the Oregon State Historic Preservation Office (SHPO), Confederated Tribes of the Warm Springs Reservation of Oregon, and Confederated Tribes of the Grand Ronde Community of Oregon on November 1, 2024. BPA has previously determined that the Ostrander Substation is eligible for listing in the National Register of Historic Places with Oregon SHPO concurrence. The Ostrander Control House is a contributing resource and individually eligible under Criterion C.

The Oregon SHPO concurred with the Area of Potential Effect and the finding of no adverse effect to historic properties on November 22, 2024. No other responses were received within 30 days. In the unlikely event that cultural resources or historic properties are inadvertently encountered during the implementation of this project, BPA will require that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA and in consultation with the appropriate consulting parties.

2. Geology and Soils

Potential for Significance: No

Explanation: The new concrete pad and bollards would be constructed on previously-disturbed ground within the substation's fenced perimeter. Minimal soil would be displaced due to the existing paved surface which would be removed and disposed of off-site. Standard construction best management practices (BMPs) would be used for sediment control. Staging and parking areas would be on existing bare ground within the substation footprint. Overall, the proposed action would have minimal impact to soil and no impact to geology.

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

Potential for Significance: No

Explanation: All work would occur on paved and gravel surfaces. Increased foot traffic around the control house may temporarily crush grass within the front lawn, but foot traffic would return

to normal following construction and the grass would grow back. Therefore, the proposed project would not impact vegetation.

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

Potential for Significance: No

Explanation: Minor and temporary disturbance to wildlife may occur from the elevated noise and increased human presence during construction. However, wildlife in the area would likely be habituated to increased human presence and noises associated with substation operations and agriculture in the general area. No habitat removal or alterations would be associated with the proposed actions. Therefore, there would be minimal impact to wildlife.

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

Potential for Significance: No

Explanation: The project site is located on paved and gravel surfaces with no waterbodies or floodplains within 500 feet. Therefore, the proposed action would not impact waterbodies or floodplains.

6. Wetlands

Potential for Significance: No

Explanation: The project site is located on paved and gravel surfaces with no wetlands present. Therefore, the proposed action would not impact wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Ground disturbance would unlikely reach depths of groundwater and no changes to wells or aquifers are proposed. BMPs would be used to minimize the risk of hazardous materials entering groundwater (i.e., fuel leaks). Therefore, the proposed actions would not impact groundwater or aquifers.

Notes:

- Ensure a spill kit is onsite during construction.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The new HVAC units would be located on BPA property and would be consistent with existing equipment within the perimeter of Ostrander Substation. No changes to the existing land use or specially-designated areas are proposed.

9. Visual Quality

Potential for Significance: No

Explanation: Minor changes to visual quality would occur due to moving the HVAC system to a ground unit; however, the concrete pad and HVAC equipment would not be visible to the public and all paint would match the existing color scheme of the control house. Therefore, the proposed action would have minimal impact on the visual quality.

10. Air Quality

Potential for Significance: No

Explanation: A small amount of dust and vehicle emissions would occur during construction; however, there would be no substantial changes to air quality due to the proposed actions.

11. Noise

Potential for Significance: No

Explanation: Construction would occur during daylight hours. Noise from construction equipment and vehicles would temporarily and sporadically increase noise above current ambient conditions; however, no long-term impacts from noise are expected and ambient HVAC noise would not exceed current noise levels of the substation.

12. Human Health and Safety

Potential for Significance: No

Explanation: BPA and its contractors would adhere to all safety requirements outlined in the BPA Substation Safety Manual. Hazardous materials would be properly handled and disposed of off-site, according to all applicable local, state, and federal regulations. Therefore, the proposed project would not impact human health and safety.

Notes:

- Certified asbestos abatement personnel would be on site to safely remove and dispose of asbestos. BPA and contract personnel would be required to familiarize themselves with the established asbestos safety plan prior to starting work.

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 #12 above.

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 project would occur on BPA fee-owned property.

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

Signed:

Justin M. Olmsted
Environmental Protection Specialist