

United States Government

Department of Energy  
Bonneville Power Administration

# memorandum

DATE: July 23, 2014

REPLY TO  
ATTN OF: KEC-4

SUBJECT: Environmental Clearance Memorandum

TO: Chris Bachmann  
Project Manager – TEP-CSB-2

**Proposed Action:** Chief Joseph and Custer Substations Security Fence Replacement

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021:** B 1.11 Fencing

**Location:** Douglas and Whatcom counties, Washington

**Proposed by:** BPA

**Description of the Proposed Action:** BPA proposes to replace existing perimeter fences with taller security fencing at Chief Joseph and Custer substations. The work would help BPA be in compliance with North American Electric Reliability Corporation-Critical Information Protection (NERC-CIP) standards, and protect critical assets from theft, vandalism, or terrorism.

At each substation, BPA would install a medium-security cut-and-climb-resistant fence, perimeter intrusion detection, video surveillance, security lighting, and a communication system. To incorporate the controls for the lighting and cameras, a security communications rack would be installed in each control house. If a drilled hole is required for communication wires in the substations' control houses—which are eligible for listing in the National Register of Historic Places—the holes would be limited to 3 inches in diameter and would be located to minimize visibility.

At both substations, the new security fences would be in the same location as the existing fence around the perimeter of the substations. A 2-foot-wide, 3-foot-deep trench would be excavated to run conduit across the substation yards from the fences to the control houses. Two types of poles would be used in the fencing – taller “security” poles to support the cameras and lighting that would require footings up to 6-feet-deep, and “regular” fence poles that would use 2-foot-deep footing. No access road improvements would be needed and work materials would be staged inside the fenced substation yards.

**Findings:** BPA has determined that the proposed action complies with Section 1021.410 and Appendix B of Subpart D 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, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011). The proposed action does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal. The proposal is not connected [40 C.F.R. 1508.25(a)(1)] to other actions with potentially significant impacts, has not been segmented to meet the

definition of a categorical exclusion, is not related to other proposed actions with cumulatively significant impacts [40 C.F.R. 1508.25(a)(2)], and is not precluded by 40 C.F.R. 1506.1 or 10 C.F.R. 1021.211. Moreover, the proposed action would not (i) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, (ii) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities, (iii) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and Liability Act-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases, (iv) have the potential to cause significant impacts on environmentally sensitive resources, or (v) 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.

This proposed action meets the requirements for the Categorical Exclusion referenced above. We therefore determine that the proposed action may be categorically excluded from further NEPA review and documentation.

Prepared by:

/s/ Carolyn A. Sharp

Carolyn A. Sharp

Contract Environmental Protection Specialist

Act 1 Group

Reviewed by:

/s/ Lydia T. Grimm, for

Gene Lynard

Supervisory Environmental Protection Specialist

Concur:

/s/ Katherine S. Pierce

Katherine S. Pierce

NEPA Compliance Officer

Date: July 23, 2014

Attachment:

Environmental Checklist for Categorical Exclusions

# Environmental Checklist for Categorical Exclusions

Name of Proposed Project: Chief Joseph and Custer Substation Security Fence Replacment

Work Order #: 00339633 and 00339827

This project does not have the potential to cause significant impacts on the following environmentally sensitive resources. See 10 CFR 1021, Subpart D, Appendix B for complete descriptions of the resources. This checklist is to be used as a summary – further discussion may be included in the Categorical Exclusion Memorandum.

Environmental Resources	No Potential for Significance	No Potential, with Conditions (describe)
1. Historic Properties and Cultural Resources DAHP concurrence received May 20, 2014	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. T & E Species, or their habitat(s) None present/previously disturbed area	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Floodplains or wetlands None present within project area	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Areas of special designation None present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Health & safety Workers would follow BPA standards for health and safety during construction	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Prime or unique farmlands None present within project area	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Special sources of water None present within project area	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Other (describe)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Signed: /s/ Carolyn Sharp

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