

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** NERC-CIP Security Upgrades 2015

**Project Manager:** Christopher Bachman, TEP-CSB-2

**Location:** Multiple locations within Bonneville Power Administration's (BPA) service area (see below)

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B2.5 Facility safety and environmental improvements

**Description of the Proposed Action:** BPA proposes to install security systems at the control houses of several substations and compensation stations across Montana, Oregon, and Washington (refer to Table 1). The work would be done to bring the substations and compensation stations into compliance with security standards established by the North American Electric Reliability Corporation's Critical Infrastructure Protection (NERC-CIP).

Work at these sites would include some or all of the following types of actions:

- Installing card readers on exterior pedestrian doors. Card reader pin pads would be installed on the interior and exterior of the main egress doors.
- Running surface-mounted conduit from card readers through floors or ceilings from door locations to security racks located near existing communication racks.
- Installing new security racks/enclosures to walls or floors (depending on site design) in the communication rooms.
- Installing fire-rated doors with card readers on access tunnels between the control house and substation yard.
- Installing additional security hardware such as motion detectors, glass break detectors, interior visitor key pads, and new door hardware.

All work would take place within the existing control house and no interior walls would be moved or altered. The project would not involve any ground disturbing activities.

**Table 1. Project Locations**

Substation	County	State
Allston Substation	Columbia	OR
Bell Substation	Spokane	WA
Benton Substation	Benton	WA
Big Eddy Substation 230kv	Wasco	OR
Celilo DC Converter Station	Wasco	OR
Chehalis Substation	Lewis	WA
Columbia Substation	Douglas	WA

<b>Substation</b>	<b>County</b>	<b>State</b>
Covington Substation	King	WA
Fort Rock Compensation Station	Lake	OR
Garrison Substation	Powell	MT
Grizzly Substation	Jefferson	OR
Holcomb Substation	Pacific	WA
John Day Substation 500 kv	Sherman	OR
Keeler Substation	Washington	OR
Knight Substation	Klickitat	WA
Lane Substation	Lane	OR
Longview Substation	Cowlitz	OR
Malin Substation	Klamath	OR
Maple Valley Substation	King	WA
Marion Substation	Marion	OR
McNary Substation	Umatilla	OR
Midway Substation	Benton	WA
Monroe Substation	Snohomish	WA
Naselle Substation	Pacific	WA
Ostrander Substation	Clackamas	OR
Paul Substation	Lewis	WA
Pearl Substation	Clackamas	OR
Raver Substation	King	WA
Sand Springs Compensation Station	Deschutes	OR
Santiam Substation	Linn	OR
Shelton Substation	Mason	WA
Sickler Substation	Douglas	WA
Snohomish Substation	Snohomish	WA
Sno-King Substation	Snohomish	WA
South Tacoma	Pierce	WA
Summer Lake Substation	Lake	OR
Sycan Compensation Station	Lake	OR
Tacoma Substation	Pierce	WA

**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, July 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.

/s/ Elizabeth Siping

Elizabeth Siping  
Contract Environmental Protection Specialist  
David Evans and Associates, Inc.

Reviewed by:

/s/ Gene Lynard

Gene Lynard  
Supervisory Environmental Protection Specialist

Concur:

/s/ Katherine S. Pierce

Katherine S. Pierce  
NEPA Compliance Officer

Date: September 3, 2015

Attachment: 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:** NERC-CIP Security Upgrades 2015

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### Project Site Description

All work would take place within existing control houses at BPA substations and compenstation stations in Montana, Oregon, and Washington.

### Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. <b>Historic and Cultural Resources</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> No potential to affect historic or cultural resources.		
2. <b>Geology and Soils</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> No ground disturbance proposed.		
3. <b>Plants</b> (including federal/state special-status species)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> No disturbance to plants would occur.		
4. <b>Wildlife</b> (including federal/state special-status species and habitats)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> No disturbance to wildlife would occur.		
5. <b>Water Bodies, Floodplains, and Fish</b> (including federal/state special-status species and ESUs)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> No water bodies present.		
6. <b>Wetlands</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> No wetlands present.		

7. **Groundwater and Aquifers**

Explanation: No impact to groundwater or aquifers.

8. **Land Use and Specially Designated Areas**

Explanation: All work within existing control houses.

9. **Visual Quality**

Explanation: No impact to visual quality.

10. **Air Quality**

Explanation: No impact to air quality.

11. **Noise**

Explanation: Minimal temporary construction noise.

12. **Human Health and Safety**

Explanation: No impact.

### **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, if necessary:

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- 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, if necessary:

- 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, if necessary:

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**Landowner Notification, Involvement, or Coordination**

Description: Not applicable.

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

Signed: /s/ Elizabeth Siping  
Elizabeth Siping – KEC-4

Date: September 3, 2015