

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Ostrander and Malin Substations Perimeter Security Upgrades

**Project Manager:** Gerri Colburn, TEP-CSB-2

**Location:** Clackamas County and Klamath County, OR

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.11 Fencing and B2.2 Building and equipment installation

**Description of the Proposed Action:** BPA proposes to replace existing perimeter fences with improved security fencing at the Ostrander and Malin Substations. The Ostrander Substation is located in Clackamas County, Oregon and the Malin Substation is located in Klamath County, Oregon. The proposed work would support BPA's compliance with North American Electric Reliability Corporation-Critical Information Protection (NERC-CIP) standards, and protects critical assets from theft, vandalism, and terrorism.

The existing seven-foot-tall fences would be removed from in-ground concrete curbing, or would be removed along with individual post foundations where there is no curbing. Eight-foot-tall cut- and climb-resistant steel-mesh security fences topped with razor wire would be installed. In addition to the increased height, security would be enhanced by a near 40% reduction in visibility through the fence, impeding target acquisition by an attacker outside of the perimeter. New gates would be installed in some locations. The existing concrete curbing-supporting sections of fence would be left in place except where the concrete would affect the levelness or performance of the new fence. In the instances where it is determined that new holes for fence post footings would need to be dug, they would be no more than 54-inches deep and approximately 30-inches wide.

The new security fences would be in the same location as the existing fence around the perimeter of the substations with minor exceptions where improved design or added features require small alterations of existing fence location (i.e., new equipment, elimination of unused gates, or variations in layout for improved camera coverage). The disturbance for expansion construction would be limited to the BPA transmission facility boundaries in which vegetation growth is regularly managed by mechanical and chemical means.

Several tall poles ("security poles"), averaging about 23 feet in height, would host cameras. The cameras that would be installed would be mounted on arm brackets sufficient to get clear line-of-sight along the fence line. They would be installed just inside the fence perimeter and elsewhere as appropriate for coverage and would require footings up to six-feet deep. The cameras would provide an integrated perimeter intrusion detection system that would monitor and assess activity in and around the substation. The system would have the capability to detect movement near the perimeter as well as fence breaching, providing alarm information and images at the exact location of movement or intrusion attempt.

To incorporate the controls for the systems, a security communications rack would be installed in the basement of the control houses at Ostrander and Malin. A two-foot-wide, three-foot-deep trench

would be excavated to run conduit across the substation yards from the control houses to the nearest fence lines if wireless connections are not used. If a drilled hole is required for communication wires in the substations' control houses, the holes would be limited to three inches in diameter and would be located to minimize visibility.

**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/ Christopher H. Furey

Christopher H. Furey  
Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel  
NEPA Compliance Officer

Date: August 21, 2018

Attachment(s): 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:** Ostrander and Malin Substation Perimeter Security Upgrades

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## Project Site Description

The Ostrander project location is at the BPA Ostrander Substation in Clackamas County, Oregon. The site is located in Township 2 South, Range 03 East, Sections 26 and 35. The site is approximately a mile west of Concordia College and two miles northwest of the Eagle Creek Golf Course. The surrounding topography consists of primarily flat land with neighboring parcels comprised of flat and forested areas, livestock pastures, and semi-rural home sites. Some wetland areas were noticeable beyond the fence perimeter on the east side and a wetland mosaic was identified on the west side. The Clackamas River is approximately 3,900 feet to the east of the project.

The Malin project location is at the BPA Malin Substation in Klamath County, Oregon. The site is located in Township 41 South, Range 13 East, Sections 17 and 20. The site is approximately five miles east of the town of Malin and a half mile north of the border with California. Wooden Creek is a typically dry stream that would run west of the project area and can be identified using BPA eGIS. The surrounding topography consists of primarily brushland area with stony loam soil type that rises up 100 feet in elevation to the west side and a rock outcrop rising up about 300 feet to the east of the substation. Most of the surrounding land of the substation is Federal land held by the Bureau of Land Management.

## 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"/>                       |
| <p><u>Explanation:</u> The BPA archaeologist reviewed the proposed activities and determined that these activities at the project area for the installation of the fencing and gates does not have potential to cause effects to historic or cultural resources.</p> <p><u>Note:</u> Treat potential discoveries of archeological materials with the 'inadvertent discovery' guidelines: Stop work, contact BPA ECT lead and BPA ECC archeologist for further notifications, and ensure integrity of site and materials until further instructions.</p>   |                                     |  |
| 2. <b>Geology and Soils</b>   | <input checked="" type="checkbox"/> | <input type="checkbox"/>                       |
| <p><u>Explanation:</u> There would be minimal soil disturbance for installation of the fencing and gates. Some digging is expected to establish posts. All work is occurring at the established substation property with disturbance limited to existing perimeter of the substations, and for short distances inside and outside the substation yards. Each substation consists of heavily disturbed and modified areas often lain with fill material. Best Management Practices (BMPs) would be implemented to limit soil transport by wind and water.</p> <p><u>Mitigation:</u> Where possible, leave roots intact in vegetation-cover removal operations.</p> |                                     |  |

3. **Plants** (including federal/state special-status species)

Explanation: The project would be occurring in the BPA substation perimeter that is currently managed for low-growing vegetation. There are no listed or special-status species present. Some brush would be cleared where needed for construction and for long-term security monitoring.

Mitigation: Re-seed any cleared areas with a BPA-approved mix of native low-growing species.

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

Explanation: The work would be at an established BPA substation. No significant trees would be removed, and the sites are not identified to provide spotted owl habitat or nesting sites. Construction of the fences and gates is expected to occur during daytime hours at the substations with limited to no effect to any listed or special-status species.

Mitigation: Clear vegetation in fall or winter before March 1 to avoid disturbing any nesting birds. Utilize applicable BMPs to limit wind and water erosion of soils to water bodies.

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

Explanation: The Clackamas River is approximately 3,900 feet to the east of the Ostrander Substation. Wooden Creek is identified to be on the west side of the Malin Substation but the creek is typically dry. There would be no in-water work occurring and construction would not be near the Clackamas River or in Wooden Creek.

Mitigation: Utilize applicable BMPs to limit wind and water erosion of soils to water bodies. Reinforce exposed soils and seed them with an appropriate and native soil-stabilizing soil mix. Develop a Fugitive Dust Control Plan.

6. **Wetlands**

Explanation: Some wetland areas are nearby but project work will avoid those areas. Work would be limited to the substation fence perimeter and the area immediately adjacent to the perimeter.

7. **Groundwater and Aquifers**

Explanation: The project would not impact groundwater or aquifers. Infiltration to groundwater and aquifers would not be adversely impacted by the construction. A dry season work schedule limits the potential for inadvertent intrusions to water sources.

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

Explanation: All work would take place on substation property consistent with activities at large substations without impact to any specially designated areas.

9. **Visual Quality**

Explanation: There would be limited visual changes to the project area or surrounding environment. The completed work with the new fence and several taller security poles may be noticeable but would constitute a small overall change to the current visual state.

10. **Air Quality**

Explanation: A small amount of dust and vehicle emissions would occur during installation. Dust would be kept to a minimum in adhering to BMPs for ground-disturbing actions as noted in the Water Bodies, Floodplains, and Fish section above. There would be small, sporadic increases in machine exhaust during periods of active work along the fence perimeter.

11. **Noise**



Explanation: Temporary construction noise would occur during daylight hours. No ongoing noise increase.

12. **Human Health and Safety**



Explanation: Workers on the project would be required to follow all applicable state and/or Federal safety standards as the majority of work would occur from inside the substation grounds, and if work occurs outside, access to the active work sites would be controlled and monitored.

In addition, the proposed work furthers BPA's compliance with NERC-CIP standards, and protects critical assets from theft, vandalism, and terrorism, and provides for a safe and reliable network for the regions.

**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: Ostrander is a BPA-owned substation and the project site is accessed by a BPA entrance road. BPA project manager will coordinate with neighboring landowners to avoid conflicts during construction. Malin is primarily a BPA-substation that is shared with other utilities, and the security upgrade will be coordinated with those utilities.

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

Signed: /s/ Christopher H. Furey  
Christopher H. Furey, ECT-4

Date: August 21, 2018