Proposed Action: Roof Drainage System Replacement at Chehalis Untanking Tower

Project Manager: Thornton Smith – TEPF-CSB-2

Project Number: P04105

Location: Lewis County, Washington

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.3 Routine maintenance

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to replace portions of the roof drainage system at BPA’s untanking tower located at the Chehalis Substation. The aging system of drain pipes, which carries rainwater from roof drains, through the building, and out to the larger stormwater management system, has failed in some areas and is blocked by debris in other areas. To avoid damage to the building structure, future failures and subsequent flooding, equipment damage and safety hazards, BPA proposes to clean drainage pipes and replace failed pipes. There is no proposed ground disturbance outside of repairing the piping that connects to catch basins that are already installed in the ground. BPA could also complete additional repair work (e.g., adjacent systems, drywall, ceiling tiles, etc.) as necessary after the drainage system is replaced or repaired. All removed material would be disposed of off-site in accordance with local, state, and Federal regulations.

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, Jul. 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/ Becky Hill
Becky Hill
Environmental Protection Specialist
Concur:

/s/ Katey C. Grange  June 16, 2022
Katey C. Grange  Date
NEPA Compliance Officer

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:** Roof Drainage System Replacement at Chehalis Untanking Tower

**Project Site Description**

The project site is located on Bonneville Power Administration (BPA) fee-owned property at BPA’s Chehalis Substation. The substation is located about 4 miles south of Chehalis, Washington, in (WA T13N R2W Sec21). All proposed actions would occur inside the existing substation building or outside of the building, yet within the substation yard. The substation yard is on previously disturbed soil, covered in gravel, and maintained clear of vegetation. No wetlands or water bodies are located within 500 feet of the substation’s perimeter chain link fence. Outside of the Chehalis Substation, the surrounding area is primarily comprised of rural residences, agricultural fields and pastures with areas of mixed conifer and hardwood forest stands.

**Evaluation of Potential Impacts to Environmental Resources**

1. **Historic and Cultural Resources**

   Potential for Significance: No

   **Explanation:** The BPA historian and archaeologist reviewed the proposed action and determined that the undertaking is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present. The historian and archaeologist issued a memo documenting this determination on May 17, 2022.

2. **Geology and Soils**

   Potential for Significance: No

   **Explanation:** No ground-disturbing activities are proposed. Therefore, the project would not impact geology and soils.

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

   Potential for Significance: No

   **Explanation:** No ground-disturbing activities are proposed and the work area is located within and on the untanking tower building, which is located inside the substation yard and is maintained clear of vegetation. Therefore, the proposed action would not impact vegetation.

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

   Potential for Significance: No
Explanation: Minor and temporary disruption of normal wildlife behavior could occur from elevated noise and human presence during project activities. However, current ambient noise and disturbances are high in the area due to routine maintenance and operations at the Chehalis Substation. As such, wildlife species that could be present in the area would likely already be habituated to human activity. There are no known occurrences of any special-status wildlife species, and no suitable habitat is present.

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

Potential for Significance: No

Explanation: The project area does not contain any water bodies, floodplains, or surface connectivity to fish-bearing streams. Therefore, the project would not impact water bodies, floodplains, or fish.

6. Wetlands

Potential for Significance: No

Explanation: The project area does not contain any wetlands. Therefore, the project would not impact wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The proposed action would not require the use of hazardous materials that could impact groundwater and aquifers and no ground-disturbing activities are proposed. No new wells or other uses of groundwater or aquifers are proposed. Therefore, the proposed action would not impact groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The project area is located inside of BPA’s Chehalis Substation on BPA fee-owned land, and the proposed action would not alter existing land use. No specially designated areas are present in the project area.

9. Visual Quality

Potential for Significance: No

Explanation: The roof drainage system would be repaired and replaced in-kind. There would be no change in visual quality following completion of the proposed action.

10. Air Quality

Potential for Significance: No

Explanation: There may be a small amount of vehicle emissions during project activities; however, there would be no substantial changes to air quality after the proposed action is complete.

11. Noise

Potential for Significance: No
Explanation: Construction activities could temporarily and intermittently produce noise levels at greater than current ambient conditions. Noise impacts would be temporary and intermittent and would only occur during daylight hours (approximately 7AM to 7PM). There would be no long-term change in ambient noise following completion of the proposed action.

12. Human Health and Safety

Potential for Significance: No

Explanation: All standard safety protocols would be followed during project activities. Hazardous materials, if found, would be disposed of off-site according to all local, state, and Federal regulations. Therefore, the proposed action would not be expected to impact human health or safety.

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: N/A

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 proposed action would occur entirely on BPA’s fee-owned property and would not impact adjacent properties. No landowner notification, involvement, or coordination would be required.
Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ Becky Hill  
Becky Hill
Environmental Protection Specialist

Date: June 16, 2022