Categorical Exclusion Determination

Bonneville Power Administration Department of Energy



Proposed Action: John Day Substation Control House HVAC Replacement

Project Manager: Christopher Ross, NWMS-1

Location: Sherman County, Oregon

<u>Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021)</u>: B1.4 Air conditioning systems for existing equipment

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to replace the heating, ventilation, and air conditioning (HVAC) system at BPA's John Day Substation control house near Rufus, Sherman 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 with built-in redundancy.

The control house currently has a ground-level outdoor HVAC system mounted to an existing concrete pad located on the north face of the building. The existing basement units, some ductwork, outdoor units, and associated equipment not compatible with the new HVAC system would be removed and disposed of at an appropriate offsite location. The new heating and cooling system would be a redundant variable refrigerant flow (VRF) with fan coils located in the basement mechanical room. An additional indoor fan unit would be added to serve non-critical spaces. Fan coils would be connected to existing ductwork, and heat pumps would be located outside on the concrete pad. Refrigerant piping would be routed from the new outdoor units, through existing wall penetrations or new small penetrations when necessary, into the basement mechanical room. New motorized dampers would also be installed in the existing ductwork for economizer control. All exterior equipment attached to the control house would be painted to match the building's color scheme.

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 1021.410(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; 89 FR 34074, April 30, 2024), 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.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 DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq*.

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: John Day Substation Control House HVAC Replacement

Project Site Description

The John Day Substation control house is located approximately 1 mile south of Rufus, Oregon (Township 2 North, Range 17 East, Section 7). The surrounding area is predominately upland agricultural fields with limited tree coverage. The site is located within the fenced perimeter of the substation where the ground is entirely paved or graveled with no vegetation coverage. The existing ground-level HVAC system is anchored in place using an existing concrete pad located just outside the northern face of the control house. There are no wetlands or surface waters within the project area.

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, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, and Nez Perce Tribe on January 27, 2025. BPA had previously determined that the John Day Substation is eligible for listing in the National Register of Historic Places with Oregon SHPO concurrence. The John Day 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 February 20, 2025. The Confederated Tribes of the Warm Springs Reservation of Oregon concurred with the finding of effect on February 18, 2025. No other responses were received.

2. Geology and Soils

Potential for Significance: No

Explanation: The increased traffic from construction vehicles and equipment staging may result in some soil compaction underneath gravel; however, compaction would be minor and construction traffic would cease following project completion. The proposed actions would have minimal impact to soils and no impact to geology.

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

Potential for Significance: No

Explanation: The project would not require vegetation removal, and all access roads, staging, and construction areas are graveled or paved with little to no vegetation. Therefore, the

proposed action would not impact plants including Federal or state special-status species or their habitats.

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

Potential for Significance: No

Explanation: Minor and temporary disturbance to wildlife may occur from elevated noise and increased human presence during construction. However, wildlife species that may be present in the area would likely be habituated to this level of human activity given its location at the John Day Substation. Construction would occur within the fenced perimeter of the substation where no suitable habitat exists for wildlife. Overall, proposed actions would have minimal impact to wildlife, and there are no documented occurrences of Federal or state special-status species or their habitats within the project site.

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

Potential for Significance: No

Explanation: The proposed action would not include any in-water work, nor is the site located within a floodplain. Therefore, the proposed project would not be expected to impact water bodies, floodplains, or Federal and state special-status fish species or their habitats.

6. Wetlands

Potential for Significance: No

Explanation: The proposed actions would occur within the fenced perimeter of the John Day Substation and with no wetlands present in the vicinity of the project site. Therefore, the project would not be expected to impact wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The project would not require any ground disturbing activities and therefore would not intersect any groundwater or aquifers. Standard construction Best Management Practices (BMPs) would reduce the potential for inadvertent spills of hazardous materials that could contaminate groundwater or aquifers. Therefore, the proposed action would not impact groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The project would take place in an existing fenced BPA facility and would not change the current land use or affect any specially-designated areas.

9. Visual Quality

Potential for Significance: No

Explanation: Minor visual changes would result with the updated outdoor HVAC equipment; however, the location of the new outdoor equipment would be installed on the existing concrete slab. Existing exterior wall penetrations would be used when possible to route refrigerant lines, and any new holes that may be required would be small. Visual changes that occur would be minimal and consistent with the existing control house building's visual characteristics.

Notes:

• Any exterior paint used would be required to match the exterior color of the building.

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 permanent changes to air quality following construction.

11. Noise

Potential for Significance: No

Explanation: Construction related noise 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 changes to noise levels at the substation are expected. The proposed project would comply with all applicable noise ordinances, as required.

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 staffed to safely remove and dispose of asbestos off-site. BPA and its contractors 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

<u>Description</u>: The project would occur at a BPA facility and would not require landowner involvement.

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