

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Sapho Engine Generator Installation

**Project No.:** P04857

**Project Manager:** David McAfee- TEPF-CSB-2

**Location:** Clallam County, WA

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.15 Support Buildings

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to demolish the existing 1976 control house and associated footings at the Sapho Substation. BPA would then install a new, enclosed engine generator and load bank assembly, mounted on concrete slab foundations in a similar location as the removed control house. BPA is also proposing to install new conduit at two locations, along with new electrical panels mounted on structural steel frames with concrete foundations in the switchyard. The conduit and electrical panels would connect the existing 2016 substation control house to the new engine generator enclosure. Conduit would run in similar locations as existing conduit to provide repetition in the event of outages and maintenance. All proposed excavation would be within previously-disturbed areas. Staging and access would utilize existing paved areas and no improvements are needed.

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.<sup>1</sup>

Christopher H. Furey  
Environmental Protection Specialist

Concur:

Katey C. Grange  
NEPA Compliance Officer

Attachment(s): Environmental Checklist

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<sup>1</sup> 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:** Sapho Engine Generator Installation

## **Project Site Description**

The project site is at the BPA Sapho Substation in Clallam County, Washington. The site is located in Township 30 North, Range 12 West, Section 29. The surrounding topography beyond the substation yard consists of primarily rolling and some hilled land with neighboring parcels comprised of cleared lands and some light and more forested areas. Some agricultural and rural development exists off the adjacent roadway and the substation is adjacent to the Sol Duc State Park. Lake Pleasant is located two miles to the west and the Sol Duc River is 800 feet south of the substation on the other side of the paved roadway. Some wetland areas would be adjacent to the Sol Duc River and are located about 800 feet south of Sapho Substation.

## **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 Jamestown S'Klallam Tribe, Lower Elwha Klallam Tribe, Makah Nation, and the Washington Department of Archaeology and Historic Preservation (DAHP) on March 19, 2025. BPA determined that the Sapho Substation is not eligible for listing in the National Register of Historic Places. There are no known historic properties within the Area of Potential Effect (APE). DAHP concurred with the APE and the finding of no historic properties affected on March 31, 2025 (DAHP Project No. 2025-03-01317). No other responses were received.

### **2. Geology and Soils**

Potential for Significance: No

**Explanation:** There would be some soil disturbance for the excavation to remove the control house and install the pre-assembled engine generator and conduit within the substation fenced area. Work would be occurring at the established substation property. Best Management Properties (BMPs) would be implemented to limit soil transport by wind.

**Notes:**

- Best Management Practices (BMPs) would be implemented to limit soil transport by wind.

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

Potential for Significance: No

**Explanation:** The project would be occurring in the BPA substation perimeter in a graveled area that is currently managed for no vegetation. There are no listed or special-status species present.

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

Potential for Significance: No

Explanation: The work would be occurring within an established BPA substation. Construction of the premanufactured building is expected to occur at daytime hours at the substation with no effect to any listed or special-status species.

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

Potential for Significance: No

Explanation: The Sol Duc River is over 800 feet south of the Sapho Substation. There would be no in-water work occurring and construction would not be near the river.

#### **6. Wetlands**

Potential for Significance: No

Explanation: Wetland areas are located adjacent to the Sol Duc River located about 800 feet south of the substation. Work would be within the substation fence perimeter. Project construction would avoid wetland areas.

#### **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: The project would not be expected to impact groundwater or aquifers.

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

Potential for Significance: No

Explanation: Project work would take place within the Sapho Substation perimeter consistent with activities at electrical substations.

#### **9. Visual Quality**

Potential for Significance: No

Explanation: There would be limited visual changes to the project area or surrounding environment. The completed construction of the engine generator may be noticeable but would constitute a small overall change to the current visual status of the substation.

#### **10. Air Quality**

Potential for Significance: No

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 activities.

Notes:

- Utilize applicable BMPs to limit wind erosion of soils during construction.

#### **11. Noise**

Potential for Significance: No

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

## 12. Human Health and Safety

Potential for Significance: No

Explanation: Workers on the project would be required to follow all applicable state and/or Federal safety standards as the construction work would occur from inside the substation grounds.

### **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: Sapho is a BPA owned substation.

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

Signed:

Christopher Furey  
Environmental Protection Specialist