

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Marion Substation Control House HVAC Replacement

Project Manager: Christopher Ross, NWMS-1

Location: Marion County, Oregon

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

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to replace the rooftop heating, ventilation, and air conditioning (HVAC) system at BPA's Marion Substation control house in Stayton, Marion 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.

The control house currently has an existing rooftop HVAC system which would be replaced by three new ground units. HVAC equipment, including basement units, ductwork, outdoor units, and associated equipment not compatible with the new HVAC system would be removed and disposed of at an appropriate offsite location. A 12 foot by 17 foot raised concrete pad and grounding loop would be excavated approximately 2 feet deep on the northeast corner of the building for the outdoor HVAC equipment. Connections from the outdoor units to the control house would be routed through minimally invasive new wall penetrations and exterior line covers would be painted to match the existing control house color. A new roof vent would be installed on the roof to accommodate the new units, and an additional indoor fan unit would be added to serve non-critical spaces. Equipment staging would occur on previously disturbed ground within the substation's fenced perimeter and access to the site would use established roads. Construction equipment would include trucks, an excavator, and common construction tools.

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: Marion Substation Control House HVAC Replacement

Project Site Description

The project site is located at BPA's Marion substation control house in Stayton, Marion County, Oregon (Township 9 South, Range 1 East, DC 46). All project activities would occur within the fenced perimeter of the substation, either inside the existing control house or outside on the roof and ground in previously disturbed areas. The front of the control house utilizes a rocky surface rather than a grass lawn. A storm water drain is located outside the north perimeter of the substation and an intermittent drainage follows Baler Lane SE which flows south to a confluence of the Santiam River over 1 mile away. No additional waterbodies or wetlands are located within the footprint of the project site. The local area is primarily farmland and rural development. Tree coverage to the north and east consists of young-generation tree stands interspersed with mature trees.

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 Grand Ronde Community of Oregon, Confederated Tribes of Siletz Indians, and Confederated Tribes of the Warm Springs Reservation of Oregon on March 3, 2025. BPA had previously determined that the Marion Substation is eligible for listing in the National Register of Historic Places with Oregon SHPO concurrence. There are no other known historic properties within the Area of Potential Effect (APE).

The Oregon SHPO concurred with the APE and the finding of no adverse effect to historic properties on March 5, 2025 (OR SHPO Case No. 25-0860). The Confederated Tribes of the Warm Springs Reservation of Oregon responded on April 2, 2025, and concurred with the finding effect. No other responses were received.

2. Geology and Soils

Potential for Significance: No

Explanation: The excavation of the new concrete pad would result in approximately 400 cubic feet of soil displacement on previously disturbed ground. Some soil would be used to backfill the grounding loop, while the rest of the soil would be disposed off-site at a BPA-approved location. All equipment staging would be within the fenced perimeter of the substation where the ground is paved or graveled. No impacts to geology would occur.

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

Potential for Significance: No

Explanation: The project area surface is rocky with little existing vegetation. Some grass and weeds are present which would be removed during construction, but the control house's planted trees would not be impacted by the proposed actions. Overall, the proposed actions would have minimal impact to common plant species and would not impact any Federal or state special-status species or their habitat.

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 in the area would likely be habituated to construction-related noise given the surrounding land use (i.e., substation operations and agricultural practices). No habitat would be altered as the project would occur within the fenced perimeter of the substation. There are no documented occurrences of special-status species near the project site, and no suitable special-status species habitat is present. Therefore, the proposed actions would have minimal impact to wildlife.

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

Potential for Significance: No

Explanation: There would be no work associated with any water bodies or floodplains. Best management practices (BMPs) would be used for sediment control and spill prevention to avoid impacts to the nearby drainage systems. Therefore, the proposed actions would not impact water bodies, floodplains, or fish.

Notes:

- Ensure a spill kit is onsite during construction to address inadvertent spills of hazardous materials (i.e., fuels and refrigerant).

6. Wetlands

Potential for Significance: No

Explanation: No wetlands are present within the project site.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Ground disturbance is unlikely to reach depths of groundwater and there would be no changes proposed to any wells or aquifers. Therefore, the proposed actions would not impact groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The new HVAC unit would be located on BPA property and would be consistent with existing equipment within the perimeter of Marion substation. No changes to the existing land use or specially-designated areas are proposed.

9. Visual Quality

Potential for Significance: No

Explanation: The new HVAC system would be visible from Baler Lane SE Road, however, all paint used would match the existing color scheme of the control house. The visual characteristics of the building would not change and therefore, the proposed actions would have limited impact to visual quality.

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 resulting from the proposed actions.

11. Noise

Potential for Significance: No

Explanation: Construction 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 impacts from noise are expected and ambient HVAC noise would not exceed current levels of the substation.

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 on site to safely remove and dispose of asbestos. BPA and contract personnel 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

Description: The project would occur on BPA fee-owned property.

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