

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Electronic Equipment and HVAC Replacement and Upgrades at Existing Buildings or Facilities through 2030

**Project Manager:** Multiple

**Location:** Multiple locations in Idaho, Oregon, Washington, Montana, California, Nevada, Utah, and Wyoming

**Categorical Exclusion Applied (from 10 C.F.R. Part 1021):** B1.7 Electronic Equipment, B1.4 Air Conditioning Systems for Existing Equipment

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to remove, replace, upgrade, and/or modify a variety of electronic equipment as the need arises at existing buildings throughout the BPA service territory. BPA also proposes to conduct heating, ventilation, and air conditioning (HVAC) activities that would support the electronic equipment replacements, upgrades, or modifications. Specifically, BPA proposes to conduct the following activities at existing buildings or facilities:

- ***Electronic equipment upgrades*** – Remove, replaced, upgrade and/or modify electronic equipment required for operation and maintenance of BPA's transmission grid. Several types of actions involving communications, meters, relays, Remedial Action Scheme (RAS) and Supervisory Control and Data Acquisition (SCADA) system upgrades would fall into this class of actions. Activities could include removal of old equipment, installing new equipment racks, new cabinets, phone systems, radios, meters, disconnects, switches, power circuit breakers, capacitive voltage transformers, bus ties, inter- and intra-net equipment, and associated wiring. Electronic equipment upgrades or modifications in support of new interconnection or integration activities are not included.
- ***Heating, ventilation and air conditioning (HVAC) removal, upgrades and replacements*** – Modify HVAC systems to accommodate electronic equipment installation or workplace comfort/safety. Activities falling under this class of action could include: removing or replacing HVAC equipment with new equipment installed in the same location or within 5 feet of the previous location; widening existing holes or cutting holes in the exterior building wall near the existing HVAC equipment to accommodate the new size or shape of the replacement equipment; installing new concrete pads for exterior HVAC units; replacing solar panels; and installing or replacing duct work, wiring, and other electrical-related equipment inside the building or facility.

These actions would occur at existing facilities, would not require major exterior building modification (e.g. removing or replacing windows or doors, cutting new wall holes in new locations), would not require major interior building modifications (e.g. tearing out walls), and would not require ground disturbing activities with the exception of new concrete HVAC unit pads. The installation of new concrete HVAC unit pads would be allowed as they would be located within the compacted gravel fill inside or immediately outside the existing substation. Any activities

that involve hazardous materials such as lead-acid batteries containing mercury would be disposed of at a designated hazardous waste facility.

Each project would be reviewed by the BPA NEPA lead and Cultural and Historical specialists to ensure that the activities fall within the range of those described in this Categorical Exclusion prior to initiating work.

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 1021.102 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; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and *DOE National Environmental Policy Act (NEPA), Implementing Procedures* (dated June 30, 2025), BPA has determined the following:

- 1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
- 2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
- 3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.<sup>1</sup>

Jeremy Doschka  
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 the interim final rule to revise DOE NEPA regulations implementing NEPA at 10 C.F.R. Part 1021 and NEPA Implementing Procedures (dated June 30, 2025), 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:** Electronic Equipment and HVAC Replacement and Upgrades at Existing Buildings or Facilities through 2030

### **Project Site Description**

Existing fenced and graveled facilities, including electric substations and control houses, maintenance headquarters, and radio facility support structures. These facilities are located in BPA's service territory, including Idaho, Oregon, Washington, western Montana and small parts of eastern Montana, California, Nevada, Utah and Wyoming.

### **Evaluation of Potential Impacts to Environmental Resources**

#### **1. Historic and Cultural Resources**

Potential for Significance: No

Explanation: BPA Cultural Resources staff has determined that the proposed undertaking meets the applicability of the Programmatic Agreement Among the Bonneville Power Administration, the Idaho State Historic Preservation Office, the Montana State Historic Preservation Office, the Oregon State Historic Preservation Office, the Washington State Historic Preservation Office, and the Advisory Council on Historic Preservation to Implement the Bonneville Power Administration Manual for Built Resources (executed July 15, 2025). Section 106 consultation was completed pursuant to Stipulation I.D.

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

Potential for Significance: No

Explanation: No ground disturbance beyond previously-compacted and graveled areas would occur, so there would be no impacts to soils and geology

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

Potential for Significance: No

Explanation: No ground disturbance in areas with vegetation would occur and no plants would be disturbed.

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

Potential for Significance: No

Explanation: Work would occur in existing, graveled facilities. No wildlife habitat present.

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

Potential for Significance: No

Explanation: Work would occur in existing, graveled facilities; no water or fish resources present.

## **6. Wetlands**

Potential for Significance: No

Explanation: Work would occur in existing, graveled facilities no wetlands present.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: No ground or groundwater disturbance would occur.

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

Potential for Significance: No

Explanation: No change in land use would occur.

## **9. Visual Quality**

Potential for Significance: No

Explanation: No change in the visual character of the facilities would occur.

## **10. Air Quality**

Potential for Significance: No

Explanation: Minor, temporary generation of emissions associated with increased vehicle traffic and equipment use would occur during construction.

## **11. Noise**

Potential for Significance: No

Explanation: Minor, intermittent noise associated with installation activities would occur during construction.

## **12. Human Health and Safety**

Potential for Significance: No

Explanation: Any hazardous materials such as batteries generated would be disposed of at a designated hazardous waste disposal facility.

### **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: Most facilities would be BPA-owned or leased. If activities are occurring within a non-BPA-owned facility, BPA would coordinate with the underlying facility owner.

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

Signed:

Jeremy Doschka ECT-4  
Environmental Protection Specialist