

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Facility Safety, Security, and Energy Efficiency Improvement Activities 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):** B2.5 Facility safety and environmental improvements; B5.1 Actions to conserve energy or water

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to conduct activities as the need arises to improve workplace comfort or safety, security systems, and energy and water efficiency at existing buildings or facilities throughout the BPA service territory. Specifically, BPA proposes to conduct the following activities at existing buildings or facilities:

- ***Workplace safety modifications and replacements*** – Install, upgrade, remove, or replace building features to enhance workplace habitability and safety conditions. Activities could include replacement of handrails in kind; modification of existing handrails; replacement or removal of interior doors; repair or in-kind replacement of steps and sidewalks; slight modifications to stair landings; replacement of non-original exterior doors and awnings; replacement or removal of non-original interior or exterior light fixtures; in-kind roof replacements, replace siding with the exact type, style, color, material and specification as the original; plumbing and electrical modifications; and interior or exterior painting or sealing that is of the same color.
- ***Security system modifications*** - Install, upgrade remove or replace security systems to comply with security standards. Activities falling under this class of action could include: installing card readers on exterior pedestrian doors; running surface-mounted conduit from card readers through floors or ceilings from door locations to security racks located near existing communication racks; installing new security racks/enclosures to walls or floors; installing fire-rated doors with card readers and/or replacing the door handles within access tunnels between the control house and substation yard; and/or installing additional security hardware, such as motion detectors, glass break detectors, interior visitor key pads, security cameras, and new interior door hardware.
- ***Energy efficiency modifications and replacements*** - Install, upgrade, remove, or replace building features to improve energy efficiency. Activities could include light bulb replacements; installation replacement or removal of non- original interior or exterior light fixtures; insulation of walls and ceilings; replacement of interior doors and replacement of non-original exterior doors; and installation replacement or removal of existing plumbing and fixtures.

These actions would occur at existing facilities, would not require major exterior building modification (e.g. removing or replacing original windows or doors, cutting wall holes in new locations), would not require major interior building modifications (e.g. tearing out walls), and would not require ground-disturbing activities. Any activities that involve hazardous materials such as incandescent bulbs containing mercury would be disposed of at a designated hazardous waste facility. Actions proposed would be reviewed by the BPA NEPA lead 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:** Facility Safety, Security, and Energy Efficiency Improvement Activities through 2030

## **Project Site Description**

Activities would be located in existing fenced or 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 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 would occur, so there would be no impacts to plants.

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

Potential for Significance: No

Explanation: Work would occur in existing, fenced or 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, fenced or graveled facilities, no water bodies, floodplains or fish habitat affected.

## 6. Wetlands

Potential for Significance: No

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

## 7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Work would occur in existing, fenced or graveled facilities, no groundwater or aquifer impacts.

## 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 construction equipment would occur during construction.

## 11. Noise

Potential for Significance: No

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

## 12. Human Health and Safety

Potential for Significance: No

Explanation: Any hazardous materials such as light bulbs or 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  
Environmental Protection Specialist