

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Mobile Transformer Storage Building at the Ross Complex

**Project No.:** P07033

**Project Manager:** Ian Flood, NWMM-1

**Location:** Clark County, Washington

**Categorical Exclusion Applied (from 10 C.F.R. Part 1021):** B1.15 Supporting buildings; B4.6 Additions and modifications to transmission facilities

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to construct a new mobile transformer storage building in the J.D. Ross Substation and Regional Operations and Maintenance Facility (Ross Complex). The new building would provide a dedicated and secure storage space for six mobile transformers, four trailers, heavy equipment, and other transmission-related materials. The storage building would provide protection from the elements, thereby contributing to a reduction in maintenance costs and improving the longevity of the equipment and materials.

To create space for the new storage building, BPA would demolish and remove an 8,000-square-foot warehouse modular office building, remove some decorative landscaping trees and small shrubs growing near the building's edge, and eliminate about 25 passenger vehicle parking spaces. If underground utilities, water and sanitary sewer lines, fiber optic cable, or communications equipment are encountered during the demolition process, they would be relocated to nearby locations to accommodate the new building's construction.

BPA would construct a new 9,400-square-foot, single-story, single-sloped roof open-bay storage building with up to 10 rolling garage doors and three human access doors. The seismically-sound building would be constructed on spread-footings up to about 5 feet deep below the ground's surface and would be about 110 feet wide by about 90 feet long. The building would have extended roof eaves and storage racks along exterior walls for additional material storage space. The storage building would also include a dead-end secondary containment system which would contain the capacity of the largest piece of oil-filled equipment. BPA would also create a permanent 11,500-square-foot asphalt laydown/storage area in the previously developed asphalt/warehouse modular office building areas.

Local station service would be routed to the new storage building for lighting and other electrical equipment needs. Water infrastructure would be brought to the building for hose bibs and sprinkler systems, however, no restroom facilities, sinks, or water for human consumption would be installed at the building. Local infrastructure would be installed to route stormwater to the Ross Complex's central stormwater facility located south of NE Ross Street. Upon construction completion of the storage building, BPA may restripe asphalt areas to indicate restricted access work areas and create up to 10 passenger vehicle parking spaces.

To perform the previously described work, excavators, dump trucks, asphalt rollers, bucket trucks and cranes, and other heavy equipment would be used.

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 the current *DOE National Environmental Policy Act (NEPA) Implementing Procedures*, 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.

Becky Hill  
Environmental Protection Specialist

Concur:

Katey C. Grange  
NEPA Compliance Officer

Attachment(s): Environmental Evaluation

# Categorical Exclusion Environmental Evaluation

This evaluation 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:** Mobile Transformer Storage Building at the Ross Complex

## **Project Site Description**

The project site is at the current location of the carpenter warehouse building (Z-1305) on BPA fee-owned property within BPA's Ross Complex in Vancouver, Washington. The Ross Complex is surrounded by residential neighborhoods on the north, east, and south, while Highway 99 and Interstate-5 are located about 250 feet and 500 feet, respectively, to the west of the complex. The Ross Complex is split north-south by a riparian corridor associated with Cold Canyon Creek and Burnt Bridge Creek, which are designated freshwater critical habitat for Lower Columbia River coho salmon. This east-west riparian corridor is about 500 feet north of the project site, and it connects the creeks and their floodplains to freshwater-forested shrub wetlands located along both sides of Highway 99 and Interstate-5.

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

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

Potential for Significance: No

Explanation: On April 8, 2026, BPA cultural resources staff determined that the proposed project 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.4 for undertaking a review at non-eligible substations per the Programmatic Agreement.

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

Potential for Significance: No with Conditions

Explanation: Construction of the new storage building would require some excavation and trenching to connect water and irrigation pipes to existing infrastructure. About 0.5 acre of existing asphalt and concrete developed surfaces would be disturbed due to implementation of the proposed action. Best management practices (BMPs) would be implemented to prevent the migration of sediment off-site.

Notes:

- Test soils for hazardous materials, which if found, would be disposed of off-site according to local, state, and federal regulations.
- Implement the BPA approved Stormwater Pollution Prevention Plan (SWPPP) under permit #WAR10F0C0.

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

Potential for Significance: No

Explanation: A small number of relatively small, ornamental trees and some small shrubs growing near the building's edge would be removed. No special-status plant species or suitable habitat for special-status plant species are present within the project area. Therefore, the proposed action would have no effect on special-status plant species or habitat.

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

Potential for Significance: No

Explanation: Minor and temporary disturbance of generalist, urban wildlife species could occur from elevated noise during construction. Because the work would be occurring within the Ross Complex where human activity is frequent, any wildlife species present are likely already used to human presence and noise. No special-status wildlife species or suitable habitat is present within the project area. Therefore, the proposed action would have no effect on special-status wildlife species or habitats.

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

Potential for Significance: No with Conditions

Explanation: No water bodies, floodplains, or special-status fish species are present within the project area. During construction, BMPs would prevent indirect impacts to off-site waterbodies, floodplains, and special-status fish and fish habitat. Therefore, the proposed action would not impact water bodies, floodplains, fish, or fish habitat.

Notes:

- Implement the BPA approved SWPPP under permit #WAR10F0C0.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

#### **6. Wetlands**

Potential for Significance: No with Conditions

Explanation: No wetlands are present within the project area. BMPs would prevent impacts to off-site wetlands. Therefore, the proposed action would have no effect on wetlands.

Notes:

- Implement the BPA approved SWPPP under permit #WAR10F0C0.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

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

Potential for Significance: No with Conditions

Explanation: Ground disturbance is unlikely to reach groundwater depths, and no new wells or other uses of groundwater or aquifers are proposed. BMPs would prevent impacts from unintended spills to groundwater or aquifers. Therefore, the proposed action would not impact groundwater or aquifers.

Notes:

- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

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

Potential for Significance: No

Explanation: The construction of the new storage building would be consistent with the surrounding structures land uses at the Ross Complex. While the Ross Complex contains a historic district, the proposed action would not impact land use or specially-designated areas, including the historic district.

## 9. Visual Quality

Potential for Significance: No

Explanation: The new storage building is visually consistent with the existing infrastructure at the Ross Complex, and views of the area where the building would be constructed are hidden from the public's view. The change in visual quality would be negligible.

## 10. Air Quality

Potential for Significance: No

Explanation: Construction activities would result in a minor and temporary increase in dust and vehicle emissions in the local area. BMPs, such as turning off vehicles when not in use, would be implemented to limit the amount of emissions released in the local area.

## 11. Noise

Potential for Significance: No

Explanation: During construction, use of vehicles and equipment and general construction activities would create noise above current ambient conditions. However, noise impacts would be temporary and intermittent and would occur during typical working hours (approximately 7am to 7pm). Construction-related noise would not likely be audible from residential properties surrounding the Ross Complex. There would be no long-term change in ambient noise following completion of the project.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: Construction would be completed by qualified professionals who would follow all applicable safety requirements as detailed in their BPA-accepted site-specific safety plan, in accordance with BPA Contractor Safety and Health Requirements for Prime and Subcontractors, and any additional state, local, or authority having jurisdiction requirements. The safety plan would be maintained on-site during construction and updated, as needed. Construction areas within the Ross Complex would be secured by perimeter security fence when construction crews are not present. Therefore, the proposed action would not be expected to impact human health and safety.

### **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: The Environmental Protection Agency (EPA) regulates contaminants left in the ground, also known as Institutional Control Areas. Consistent with an agreement with the EPA, BPA's Pollution Prevention and Abatement department reviewed the proposed action, and approved Ross Dig Permit #2026-007 on May 19, 2026, for the Institutional Control Area located within the project area.

Prior to construction, BPA will have a third-party consultant develop a contaminated media management plan (CMMP) to ensure any soil or waste generated during the construction activity is properly managed and disposed of according to local regulations. Additionally, a qualified industrial hygiene firm has written a Hazardous Materials Management Plan for implementation in the unlikely event that problematic materials are identified during project activities. This firm would be available for additional sampling and direction throughout the project to ensure that hazardous substances or pollutants are not released in an uncontrolled manner.

**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 proposed action would occur on BPA fee-owned property. Therefore, no landowner notification, involvement, or coordination is required.

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

Signed:

Becky Hill  
Environmental Protection Specialist