

## Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** NERC-CIP Security Upgrades

**Project Manager:** Christopher Bachman, TEP-CSB-2

**Location:** Multiple locations within Bonneville Power Administration's (BPA) service area

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B2.5 Facility safety and environmental improvements

**Description of the Proposed Action:** BPA proposes to install security systems on the control houses at several substations across the states of Montana, Oregon, and Washington. The work would be done to bring the substations into compliance with security standards established by the North American Electric Reliability Corporation's Critical Infrastructure Protection (NERC-CIP).

Work at these sites would include some or all of the following types of actions:

- Installing card readers on exterior pedestrian doors. Card reader pin pads would be installed on the interior and exterior of the main egress 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 (depending on site design) in the communication rooms;
- Installing fire-rated doors with card readers on access tunnels between the control house and substation yard;
- Installing additional security hardware such as motion detectors, glass break detectors, interior visitor key pads, and new door hardware.

All work would take place within the control house or relay house and no interior walls would be moved or altered. The project would not involve any ground disturbing activities. For specific substations included in the project, refer to Table 1 and Table 2.

Table 1. Non-historic Substations

<b>Non-Historic Substation</b>	<b>County</b>	<b>State</b>	<b>Township/Range/Section</b>
Columbia Falls 115-kV Yard	Flathead	MT	30N 20W Sec 15
Flathead	Flathead	MT	29N 21W Sec 30

Kalispell	Flathead	MT	28N 21W Sec 1
Boardman	Morrow	OR	4N 25E Sec 11
Fairview	Coos	OR	27S 12W Sec 24
Jones Canyon	Gilliam	OR	2N 21E Sec 8
Bellingham	Whatcom	WA	38N 3E Sec 9
Bettas Road	Kittitas	WA	19N 17E Sec 15
Chehalis	Lewis	WA	13N 2W Sec 21
Fairmount	Jefferson	WA	29N 2W Sec 25
Intalco	Whatcom	WA	39N 1E Sec 20 39N 1E Sec 21 39N 1E Sec 28 39N 1E Sec 29
Knight	Klickitat	WA	5N 15E Sec 35
Longview	Cowlitz	WA	8N 3W Sec 38
North Bonneville	Skamania	WA	2N 7E Sec 39
Schultz	Kittitas	WA	19N 19E Sec 19

Table 2. Historic-eligible Substations

<b>Historic-Eligible Substation</b>	<b>County</b>	<b>State</b>	<b>Township/Range/Section</b>
Columbia Falls 230-kV Yard	Flathead	MT	30N 20W Sec 15
La Grande	Union	OR	3S 36E Sec 9
Redmond	Deschutes	OR	15S 13E Sec 18
Roundup	Umatilla	OR	2N 32E Sec 24
The Dalles	Wasco	OR	2N 13E Sec 32
Boundary	Pend Oreille	WA	10N 13E Sec 10
Murray	Snohomish	WA	31N 6E Sec 19

**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, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), 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.

/s/ Hannah Sharp

Hannah Sharp  
Contract Environmental Protection Specialist  
CorSource Technology Group

Reviewed by:

/s/ Gene Lynard

Gene Lynard  
Supervisory Environmental Protection Specialist

Concur:

/s/ Katherine S. Pierce

Katherine S. Pierce  
NEPA Compliance Officer

Date: October 3, 2014

Attachment(s): Environmental Checklist

# 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: NERC-CIP Security Upgrades**

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## Project Site Description

All work would take place within the control houses or relay houses at multiple substations on BPA fee-owned property in Montana, Oregon, and Washington. All project areas have been previously disturbed.

## Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. <b>Historic and Cultural Resources</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> MT SHPO concurrence on no adverse effect determination 9/5/14. OR SHPO concurrence on no adverse effect determination 9/15/14. WA SHPO concurrence on no adverse effect determination 8/25/14. Determination from Tribal Affairs that project would not potentially affect tribal resources 7/15/14.		
2. <b>Geology and Soils</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> No ground disturbance proposed. All work in control houses or relay houses within previously disturbed substation yards.		
3. <b>Plants</b> (including federal/state special-status species)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> All work in existing substation yards. Areas previously disturbed and no plants present.		
4. <b>Wildlife</b> (including federal/state special-status species and habitats)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> All work in existing substation yards. No habitat present.		
5. <b>Water Bodies, Floodplains, and Fish</b> (including federal/state special-status species and ESUs)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> No in-water work. No work proposed within a floodplain.		

6. **Wetlands**

Explanation: No wetlands present in project areas.

7. **Groundwater and Aquifers**

Explanation: No ground disturbance proposed.

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

Explanation: All work in existing substation yards.

9. **Visual Quality**

Explanation: All work would take place inside existing control houses or relay houses.

10. **Air Quality**

Explanation: Proposed work would not generate dust or vehicle/equipment emissions and would not require air quality permits.

11. **Noise**

Explanation: Temporary construction noise during daylight hours. Operational noise would not change.

12. **Human Health and Safety**

Explanation: No known soil contamination or hazardous conditions at project locations.

### **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, if necessary:

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- 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, if necessary:

- 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, if necessary:

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**Landowner Notification, Involvement, or Coordination**

Description: No notification. All work on BPA fee-owned property and no visual or other effects to adjacent landowners.

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

Signed: /s/ Hannah Sharp  
Hannah Sharp, KEC-4

Date: October 3, 2014