

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** HVAC Installation at Covington Substation and Maintenance Headquarters  
(update to CX issued on May 21, 2021)

**Project Manager:** Michael B. Henjum, TEPS-TPP-1

**Location:** King County, Washington

**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 install a new heating, ventilation, and air conditioning (HVAC) system at BPA's Covington Substation Maintenance Headquarters building (also known as the Untaking Tower) in Kent, King County, Washington (Township 22 North, Range 5 East, Sections 35 and 36). The existing HVAC system does not provide adequate temperature regulation required for optimal operation of indoor electronic equipment. This CX has been updated to reflect the need for two HVAC units, rather than the original proposal to install a single HVAC unit.

BPA would install two new HVAC units mounted on a new concrete pad surrounded by at least two (but up to four) reinforced concrete or steel protective bollards to prevent vehicle collisions. The concrete pad and bollards would be located in a previously-disturbed and graveled area at the southwest corner of the Untanking Tower, between the loading dock and the substation fence. BPA would remove, replace, relocate, and/or install new ductwork, wiring, and other components of the HVAC system inside the building. If possible, BPA would use existing ductwork and conduits in the walls and floors; however, BPA could also widen existing holes or cut new holes in exterior and interior walls, as necessary to accommodate the new size or shape of the HVAC equipment. No major interior or exterior building modifications would be required, and all remaining holes in the exterior and interior walls would be patched and painted to match the existing façade.

All materials and equipment staging would be located inside the Untanking Tower or outside in previously-disturbed and graveled areas. Excavated fill material would be stored temporarily and then deposited elsewhere on-site. Demolished material and decommissioned equipment would be appropriately disposed of off-site, according to all applicable local, state, and Federal regulations.

**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), 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/ W. Walker Stinnette

W. Walker Stinnette  
Contract Environmental Protection Specialist  
Salient CRGT

Reviewed by:

/s/ Carol P. Leiter

Carol P. Leiter  
Supervisory Environmental Protection Specialist

Concur:

|                            |                          |
|----------------------------|--------------------------|
| <u>/s/ Katey C. Grange</u> | <u>December 17, 2021</u> |
| Katey C. Grange            | Date                     |
| NEPA Compliance Officer    |                          |

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:** HVAC Installation at Covington Substation and Maintenance Headquarters (update to CX issued on May 21, 2021)

## **Project Site Description**

The project site is located on Bonneville Power Administration (BPA) fee-owned property at BPA's Covington Substation and Maintenance Headquarters in Kent, King County, Washington (Township 22 North, Range 5 East, Sections 35 and 36). All project activities would occur inside the existing Maintenance Headquarters building (also known as the Untanking Tower) and outside within previously disturbed graveled areas. Little to no vegetation is present within the project site. Areas of ground disturbance are predominantly underlain by the Everett soil series, which is not hydric. No waterbodies or wetlands are present within 500 feet of the site. Land use surrounding the project site is primarily urban development with a mix of commercial, industrial, and residential properties and some fragmented forest stands.

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

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

Potential for Significance: No

Explanation: Covington Substation and Maintenance Headquarters is listed on the National Register of Historic Places. No archaeological resources would be impacted as all ground disturbance would occur within previously-disturbed and graveled areas within the substation yard. Minor additive features associated with the removal and replacement of the HVAC system does not adversely impact the integrity of the historic property. Therefore, the proposed undertaking would have no potential to effect historic properties.

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

Potential for Significance: No

Explanation: Ground-disturbing activities would include excavating for a new concrete pad and up to four protective bollards. All ground disturbance would occur within previously-disturbed and graveled areas within the substation yard.

Notes:

- BPA and its contractors would implement best management practices (BMPs) to address temporary erosion and sediment control, if required.
- Excavated soils would be stored temporarily and then used for backfill or deposited elsewhere on-site.

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

Potential for Significance: No

Explanation: The project would not require any vegetation removal or management, and all access roads, staging areas, and construction areas are graveled or paved with little to no vegetation. No suitable special-status plant species habitat is present. Therefore, the proposed project would have no effect on special-status plant species or habitats.

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

Potential for Significance: No

Explanation: Minor and temporary wildlife disturbance could occur from elevated noise and human presence during construction. However, wildlife species that could be present in the area would likely be habituated to this level of human activity given surrounding land uses. There are no documented occurrences of any special-status species near the project site, and no suitable special-status species habitat is present. Therefore, the proposed project 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

Explanation: No water bodies, floodplains, or fish are present within or near the project site. Therefore, the proposed project would not impact water bodies and floodplains and would have no effect on special-status fish species or habitats.

#### **6. Wetlands**

Potential for Significance: No

Explanation: No wetlands are present within or near the project site. Therefore, the proposed project would not impact wetlands.

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

Potential for Significance: No

Explanation: It is unlikely that ground disturbance would be deep enough to intersect groundwater or aquifers, if present. Therefore, the proposed project would not impact groundwater or aquifers

Notes:

- BPA and its contractors would implement BMPs to reduce the potential for inadvertent spills of hazardous materials that could enter groundwater or aquifers, if required.

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

Potential for Significance: No

Explanation: The project would not require a change in land use and would not impact specially-designated areas.

#### **9. Visual Quality**

Potential for Significance: No

Explanation: The final appearance of the substation yard and Untanking Tower would be largely consistent with the existing appearance of the site and would not be visible to the public. The project site is not located in a visually sensitive area.

## 10. Air Quality

Potential for Significance: No

Explanation: Temporary and minor dust and vehicle emissions would increase in the local area during construction. Following completion of the proposed project, there would be no long term change in air quality.

## 11. Noise

Potential for Significance: No

Explanation: During construction, use of vehicles, machinery, and equipment and general construction activities could temporarily and intermittently increase noise above current ambient conditions during daylight hours. However, noise from operation of the new HVAC system would not exceed current ambient noise conditions. The proposed project would comply with all applicable noise ordinances.

## 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 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: 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: The project site is on BPA fee-owned property. No landowner notification, involvement, or coordination was conducted.

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

Signed: /s/ W. Walker Stinnette December 17, 2021  
W. Walker Stinnette, EC-4 Date  
Contract Environmental Protection Specialist  
Salient CRGT