

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Roof Replacements and Thermal Performance Improvements at Garrison and Keeler Substations

Project Manager: Micaiah Watkins – TEPF – CSB 2

Location: Washington County, Oregon (Keeler) and Powell County, Montana (Garrison)

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B2.1 Workplace enhancements, and B5.1 Actions to conserve energy or water.

Description of the Proposed Action: Bonneville Power Administration (BPA) is proposing to conduct activities to improve thermal efficiency and moisture retention in buildings at two BPA-owned substations. The improvements would take place at the Garrison Substation's control house and maintenance building in Powell County, Montana and at Keeler Substation's maintenance building in Washington County, Oregon. Specifically, BPA proposes to conduct the following activities:

- **Roof Replacements:** Remove existing roof system and install new system for better water and moisture performance. Activities could include replacement or installation of new shingles, roof membranes, gutters, sealants, downspouts, snow guards, skylights, and roof insulation.
- **Improvement of Thermal Performance:** Replace or install new features that would improve the thermal performance and moisture retention of the buildings. Activities could include replacing existing windows, replacing gypsum board, installing a weather barrier system or improving current system, replacing insulation, improving interface details, replacing or installing sealant, and installing drainage planes behind siding.

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/ Kathryn Duvall

Kathryn Duvall
Contract Environmental Protection Specialist
Portland State University

Reviewed by:

/s/ Carol Leiter

Carol Leiter

Supervisory Environmental Protection Specialist

Concur:

/s/ Katey C. Grange

Katey C. Grange

NEPA Compliance Officer

Date: January 22, 2020

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: Roof Replacements and Thermal Performance Improvements at Garrison and Keeler Substations

Project Site Description

Both project sites are limited to buildings within BPA substation property and work would be done on the roofs and interior and exterior walls of the buildings. The Garrison substation is located in a rural area of Montana. The Keeler substation is located in a commercial and highly trafficked area in Hillsboro, Oregon.

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. Historic and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> BPA Historian has reviewed the undertaking and determined there is no potential to effect historic properties. Garrison and Keeler Substations have been determined not eligible, therefore no consultation is required.		
2. Geology and Soils	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> No ground disturbance would occur and, therefore, there would be no effect on geology or soils.		
3. Plants (including Federal/state special-status species and habitats)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> No plants would be impacted by project work.		
4. Wildlife (including Federal/state special-status species and habitats)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> Work would occur only in and on substation buildings and is not expected to substantially impact wildlife or its habitat. However, minor, temporary noise from project work may disturb wildlife close to the project area during project construction at Garrison substation because of its rural, isolated setting. Keeler substation is in a busy, heavily trafficked area and project noise is not expected to be louder than typical noise for that area.		
5. Water Bodies, Floodplains, and Fish (including Federal/state special-status species, ESUs, and habitats)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> There would be no impacts to bodies of water, floodplains, or fish.		
6. Wetlands	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> Work would only occur at building site and there would be no impact to wetlands.		

7. **Groundwater and Aquifers**

Explanation: No impacts to groundwater or aquifers.

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

Explanation: No change in land use or area designation would occur.

9. **Visual Quality**

Explanation: There would be no permanent visual impacts at either site, as the replacements are largely in-kind and would look very similar to the existing roofs and windows.

10. **Air Quality**

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

11. **Noise**

Explanation: The Keeler substation is surrounded by commercial buildings and highly trafficked roads, including Interstate 26 directly to the north of the substation. Any noise created by project construction is not expected to be louder than typical noise in the area during regular working hours. Garrison substation is in a rural setting, with the closest buildings more than 0.75 miles away. Any noise from project construction is expected to be minor. At both sites, noise is temporary and would have no impact after project completion.

12. **Human Health and Safety**

Explanation: There would be no impact to health and human safety. All materials would be disposed of properly.

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:

Landowner Notification, Involvement, or Coordination

Description: N/A – BPA is the underlying landowner.

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

Signed: /s/ Kathryn Duvall
Kathryn Duvall – ECF - 4
Contract Environmental Protection Specialist
Portland State University

Date: January 22, 2020