

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Big Eddy Substation Control House HVAC and Roof Replacement

**Project Manager:** Christopher Ross, NWMS-1

**Location:** Wasco County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.4 Air conditioning systems for existing equipment; B1.31 Installation or relocation of machinery and 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 Big Eddy Substation 230-kV control house in The Dalles, Oregon. The existing HVAC system has exceeded its useful service life and would be replaced by a modern and more energy efficient HVAC system.

The control house currently has two existing roof top HVAC units which would be removed and disposed of off-site. The roof top HVAC configuration would be replaced by two new HVAC units mounted on the ground on an existing concrete pad located on the eastern side of the control house. Moving the HVAC system from the roof to ground level increases safety for maintenance personnel when servicing and maintenance are required. HVAC ducting would be reused when possible and replaced with new ducting as required. Overhead HVAC lines would be routed into the building through the exterior HVAC connection system and connected to equipment inside the control house mezzanine. New wall penetrations to connect HVAC refrigerant lines to indoor equipment would be minimally sized and made with the least intrusive method possible. All exterior equipment attached to the control house would be painted to match the building's color scheme. Two surface mounted ductless HVAC units would be installed inside each of the battery rooms of the control house. Temporary weatherproofing of all roof penetrations caused by the removal of the existing HVAC units would be used until 2025.

In addition to the HVAC system replacement and relocation, BPA proposes to replace the existing roof of the Big Eddy Substation control house in 2025. The existing roof assembly would be removed down to the deck, along with the existing modified bitumen roof, sheet metal flashing on the parapet, roof vents, and drains. Bracing would be added to the existing roof structure to seismically harden the roof diaphragm which ensures building code standards are met. New synthetic roof material and sheet metal flashing would be installed, along with new roof drains that include overflow draining. Removed vents and drains would be patched, and the project would not change the flat roof design and appearance of the control house.

**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.

Justin Olmsted  
Environmental Protection Specialist

Concur:

Katey C. Grange  
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:** Big Eddy Substation Control House HVAC and Roof Replacement

## **Project Site Description**

The project site is located at BPA's Big Eddy Substation 230-kV control house in The Dalles, Oregon (Township 2 North, Range 14 East, Section 31). All project activities would occur within the fenced area of the substation inside the existing control house or outside on the roof and ground in previously-disturbed graveled and paved areas. Little to no vegetation is present within the project site, and the new HVAC system would be mounted on an existing 10-foot by 12-foot concrete slab on the east side of the control house. No waterbodies or wetlands are present within the project site footprint. Interstate 84 is located approximately 0.5 mile to the northwest of the project area, which creates a barrier to the Columbia River flowing adjacent to the interstate. From the control house, the land slopes steeply downwards to Fifteenmile Creek, approximately 0.25 mile to the north of the project site which is separated from the substation by multiple rural roads. Land use surrounding the project site is primarily agricultural fields and residential areas, with dispersed trees, shrubs, and various grasses throughout the surrounding area.

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

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

Potential for Significance: No

Explanation: Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and implementing regulations 36 CFR 800, BPA initiated consultation with the Oregon State Historic Preservation Office (SHPO), Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Warm Springs Reservation of Oregon, Confederated Tribes of the Umatilla Indian Reservation, and the Nez Perce Tribe on August 29, 2024. BPA has previously determined that the Big Eddy Substation is eligible for listing in the National Register of Historic Places with Oregon SHPO concurrence. The Big Eddy 230-kV Control House is a contributing resource.

The Oregon SHPO concurred with the Area of Potential Effect and the finding of no adverse effect to historic properties on September 25, 2024. No other responses were received within 30 days. In the unlikely event that cultural resources or historic properties are inadvertently encountered during the implementation of this project, BPA would require that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA and in consultation with the appropriate consulting parties.

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

Potential for Significance: No

Explanation: No soil would be disturbed by this project. The replacement HVAC unit would be located on an existing concrete slab located on the east side of the control house. Staging

for construction would be located on existing graveled or paved surfaces. Therefore, the proposed project would have no effect on geology or soils.

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

Potential for Significance: No

Explanation: The project would not require vegetation removal, and all access roads, staging, and construction areas are graveled or paved with little to no vegetation. There are no Federal or state special-status species or their habitats that would be impacted from the project. 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 disturbance to wildlife would occur from elevated noise and human presence during construction. However, wildlife species that may be present in the area would likely be habituated to this level of human activity given surrounding land uses. There would be no direct impacts to wildlife within the project vicinity due to work occurring inside the enclosed substation. There are no documented occurrences of any special-status species near the project site, and no suitable special status species habitat is present.

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

Potential for Significance: No

Explanation: The Columbia River and Fifteenmile Creek are located to the north beyond 0.25 mile and would not be within the footprint of the project. 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: The project would not require any ground disturbance and therefore would not intersect any groundwater or aquifers. Standard construction BMPs would reduce the potential for inadvertent spills of hazardous materials that could contaminate groundwater or aquifers. Therefore, the proposed action would not impact groundwater or aquifers.

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

Potential for Significance: No

Explanation: The substation is located within the Columbia River Gorge National Scenic Area (CRGNSA) in a designated Urban Area; therefore, the provisions in the management plan do not apply. There would be no change in the current transmission facility land use.

## 9. Visual Quality

Potential for Significance: No

Explanation: There would be minor impacts to visual quality from the project resulting from the removal of the roof HVAC equipment, installation of the new HVAC system, and replacement of the existing substation roof. However, these changes would be minimally visible and consistent with the existing control house building's visual characteristics and its surroundings.

Notes:

- All paint used would be required to match the exterior color of the building

## 10. Air Quality

Potential for Significance: No

Explanation: A small amount of dust and vehicle emissions would occur during construction; however, there would be no substantial changes to air quality during or after construction.

## 11. Noise

Potential for Significance: No

Explanation: Construction resulting from the HVAC and roof replacement would occur during daylight hours. Noise from construction equipment and vehicles would temporarily and sporadically increase noise above current ambient condition; however, no long-term impacts from noise are expected and ambient HVAC noise would not exceed current noise levels at the Substation. 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 impact human health and safety.

Notes:

- Certified asbestos abatement personnel would be on site to safely remove and dispose of asbestos off-site. BPA and contract personnel would be required to familiarize themselves with the established asbestos safety plan prior to starting work.

### **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: See #12 above.

**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 would occur at a BPA facility and would not require landowner involvement.

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

Signed:

Justin Olmsted  
Environmental Protection Specialist