Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Keeler and Marion Substation Security Upgrades

Project No.: P03723 and P03694

Project Manager: Gerri Colburn, TEP-CSB-2

Location: Washington County, OR and Marion County, OR

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.11 Fencing; B2.2 Building and equipment installation

Description of the Proposed Action: BPA proposes to replace existing perimeter fences with improved security fencing at the Keeler and Marion Substations. The Keeler Substation is located in Washington County, Oregon and the Marion Substation is located in Marion County, Oregon. The proposed work would support BPA's compliance with North American Electric Reliability Corporation-Critical Information Protection (NERC-CIP) standards, and protects critical assets from theft, vandalism, and terrorism.

The existing 7-foot-tall fences would be removed from in-ground concrete curbing or would be removed along with individual post foundations where there is no curbing. Eight-foot-tall cut- and climb-resistant steel-mesh security fences topped with razor wire would be installed. In addition to the increased height, security would be enhanced by a near 40% reduction in visibility through the fence, impeding target acquisition by an attacker outside of the perimeter. New gates would be installed in some locations. The existing concrete curbing supporting sections of fence would be left in place except where the concrete would affect the levelness or performance of the new fence. In the instances where it is determined that new holes for fence post footings would need to be dug, the footing holes would be no more than 54-inches deep and approximately 30-inches wide.

The new security fences would be in the same location as the existing fence around the perimeter of the substations with minor exceptions where improved design or added features require small alterations of existing fence location (i.e., new equipment, elimination of unused gates, or variations in layout for improved camera coverage). The disturbance for expansion construction would be limited to the BPA transmission facility boundaries in which vegetation growth is regularly managed by mechanical and chemical means. BPA would remove about seven small trees at Marion Substation along the northern and eastern perimeter of the substation property. Some new trees would be planted at Marion and Keeler in locations that would not be expected to impair camera sighting.

Several tall poles ("security poles"), averaging about 23 feet in height, would host cameras. The cameras that would be installed would be mounted on arm brackets sufficient to get clear line-of-sight along the fence line. Cameras would be installed just inside the fence perimeter and elsewhere as appropriate for coverage and would require footings up to six feet deep. The

cameras would provide an integrated perimeter intrusion detection system that would monitor and assess activity in and around the substation. The system would have the capability to detect movement near the perimeter as well as fence breaching, providing alarm information and images at the exact location of movement or intrusion attempt.

To incorporate the controls for the systems, a security communications rack may be installed in the control houses at Keeler and Marion substations. A 2-foot-wide, 3-foot-deep trench may be excavated to run conduit across the substation yards from the control houses to the nearest fence lines if wireless connections are not used. Some additional trenching may be done outside of the fenceline on substation property at Marion to accommodate wiring and conduit to a new gate on the west side of the substation. If a drilled hole is required for communication wires in the substations' control houses, the holes would be limited to 3 inches in diameter and would be located to minimize visibility.

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/ Christopher H. Furey
Christopher H. Furey
Environmental Protection Specialist

Concur:

KATEY GRANGE
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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: Keeler and Marion Substation Security Enhancement

Project Site Description

The Keeler project site is at the BPA Keeler Substation in Washington County, Oregon. The site is located in Township 1 North, Range 02 West, Section 23. The site is about 0.5 miles southeast of the Hillsboro Stadium and adjacent to the highway. The surrounding topography beyond the substation yard consists of primarily flat and rolling land with neighboring parcels comprised of a highway and a mix of commercial and residential suburban development. Some wetland areas have been delineated on the southwest corner of the substation property. Dawson Creek is over 2,000 feet west of the project.

The Marion project location is at the BPA Marion Substation in Marion County, Oregon. The site is located in Township 9 South, Range 01 East, DC 46. The surrounding topography consists primarily of flat and rolling farmland, greenspaces, and some limited rural development. Some wetland areas are located on the southeastern side of the substation about 300 feet from the substation fence. Alder Creek is located south of the substation.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: The BPA archaeologist reviewed the proposed activities and determined that these activities at the project area for the installation of the fencing, gates, cameras, and rack does not have potential to cause effects to historic or cultural resources.

2. Geology and Soils

Potential for Significance: No

Explanation: There would be minimal soil disturbance for installation of this security upgrade project. Some digging and trenching is expected to establish several of the new fence post locations and for necessary conduit. All work would be occurring at the established substation properties. Best Management Practices (BMPs) would be implemented to limit soil transport by wind and water.

Notes:

- Where possible, leave roots intact in vegetation-cover removal operations. Best Management Practices (BMPs) would be implemented to limit soil transport by wind and water.

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

Potential for Significance: No

Explanation: The project would be occurring in the BPA substation perimeters that are currently managed for low-growing vegetation. There are no listed or special-status species present. Some brush and small trees would be cleared where needed for construction and for long-term security monitoring.

Notes:

- Re-seed any cleared area with a BPA-approved mix of native low-growing species.

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

Potential for Significance: No

Explanation: The work would be occurring at established BPA substations. About seven small trees would be removed at Marion Substation, and the sites are not identified to provide spotted owl habitat or nesting sites. Some vegetation along the fence would be cleared at Keeler Substation.. Construction of the fences and gates is expected to occur during daytime hours at the substations with limited to no effect to any listed or special-status species.

Notes:

- Utilize applicable BMPs to limit wind and water erosion of soils.

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

Potential for Significance: No

Explanation: The Dawson Creek is over 2,000 feet west of the Keeler Substation. Alder Creek is south of the Marion Substation, and there would be no in-water work occurring and construction would not be near the creeks.

Notes:

- Use applicable BMPs to limit wind and water erosion of soils to water bodies. Reinforce exposed soils and seed them with an appropriate and native soil-stabilizing soil mix suitable to the environment. Develop a Fugitive Dust Control Plan.

6. Wetlands

Potential for Significance: No

Explanation: Some wetland areas are nearby, but project work would avoid those areas. Work would be limited to the substation fence perimeter and the area immediately adjacent to the perimeter. Project construction would avoid delineated wetland areas southwest of Keeler Substation and south of Marion substation.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The project would not impact groundwater or aquifers. Infiltration to groundwater and aquifers would not be adversely impacted by the construction. A dry season work schedule limits the potential for inadvertent intrusions to water sources.

Notes:

- Work should occur during the summer dry season or during a period when the southern boundary at Marion Substation is still dry.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: All work would take place around BPA substation properties consistent with activities at large substations without impact to any specially-designated areas.

9. Visual Quality

Potential for Significance: No

Explanation: There would be limited visual changes to the project area or surrounding environment. The completed work with the new fences and other substation security enhancements may be noticeable but would constitute a small overall change to the current visual states.

10. Air Quality

Potential for Significance: No

Explanation: A small amount of dust and vehicle emissions would occur during installation. Dust would be kept to a minimum in adhering to BMPs for ground-disturbing actions as noted in the Water Bodies, Floodplains, and Fish section above. There would be small, sporadic increases in machine exhaust during periods of active work along the fence perimeter.

11. Noise

Potential for Significance: No

Explanation: Temporary construction noise would occur during daylight hours. No ongoing noise increases.

12. Human Health and Safety

Potential for Significance: No

Explanation: Workers on the project would be required to follow all applicable state and/or Federal safety standards as the majority of work would occur form inside the substation grounds, and if work occurs outside, access the other active work sites would be controlled and monitored.

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: Marion and Keeler are BPA owned substations and the project sites are accessed by BPA entrance roads.

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

Signed: */s/ Christopher H. Furey* *December 20, 2023*
Christopher H. Furey Date
Environmental Protection Specialist