

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Soil Sampling and Geotechnical Investigations at the Ross Complex

Project No.: P07033

Project Manager: Erin Couch, NWMM-1

Location: Clark County, Washington

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B3.1 Site characterization and environmental monitoring

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to perform soil sampling and geotechnical investigations to inform design details for potential site developments in the future at the J.D. Ross Substation and Regional Operations and Maintenance Facility (Ross Complex). Up to 10 sampling locations have been identified within the parking lot and surrounding areas of the Modular Warehouse on the Ross Complex. A truck-mounted drill rig and directional boring equipment would be used to collect the soil samples up to 10 feet deep and up to 50 feet deep for the geotechnical investigation work. All bore holes would be refilled with bentonite and cold-patched with bag asphalt following completion of the site characterization and soil testing.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

Findings: In accordance with Section 1021.102 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; 89 FR 34074, April 30, 2024; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and *DOE National Environmental Policy Act (NEPA), Implementing Procedures* (dated June 30, 2025), BPA has determined the following:

- 1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
- 2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
- 3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.¹

Becky Hill
Environmental Protection Specialist

Concur:

Katey C. Grange
NEPA Compliance Officer

Attachment(s): Environmental Evaluation

¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to the interim final rule to revise DOE NEPA regulations implementing NEPA at 10 C.F.R. Part 1021 and NEPA Implementing Procedures (dated June 30, 2025), to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*

Categorical Exclusion Environmental Evaluation

This evaluation 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.

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Project Site Description

The project site is at the current location of the carpenter warehouse building (Z-1305) on BPA fee-owned property within BPA's Ross Complex in Vancouver, Washington. The Ross Complex is surrounded by residential neighborhoods on the north, east, and south, while Highway 99 and Interstate-5 are located about 250 feet and 500 feet, respectively, to the west of the complex. The Ross Complex is split north-south by a riparian corridor associated with Cold Canyon Creek and Burnt Bridge Creek, which are designated freshwater critical habitat for Lower Columbia River coho salmon. This east-west riparian corridor connects the creeks and their floodplains to freshwater-forested shrub wetlands located along both sides of Highway 99 and Interstate-5.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: The Ross Complex has had substantial and continual disturbance since its original construction in 1940, and as such, it is extremely unlikely that any intact archaeological resources remain. The borings are not located within the boundary of any known historic properties.

On November 13, 2025, BPA determined, per 36 CFR 800.3(a)(1), that the sampling is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present.

2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: The geotechnical investigations and soil sampling would disturb existing asphalt surfaces and bore to depths of up to 50 feet deep. All bore holes would be refilled with bentonite and cold-patched with bag asphalt following completion of the site characterization and soil testing. A representative sampling plan for the work area would be created by the contractor to test for potential contamination. Best management practices (BMPs) would be implemented to prevent the migration of sediment or geotechnical slurry material off-site.

Notes:

- Test soils for hazardous materials, including but not limited to RCRA8, NWTPH-dx and PCBs. If found, the soils would be disposed of off-site according to local, state, and federal regulations.
- Implement a BPA-approved Erosion and Sediment Control Plan (ESCP) that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.

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

Potential for Significance: No

Explanation: The soil sampling and geotechnical investigations would occur in non-vegetated, asphalt areas. Therefore, the proposed action would have no effect on special-status plant species or habitat.

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

Potential for Significance: No

Explanation: Minor and temporary disturbance of wildlife could occur from elevated noise during construction. Because the work would be occurring within the Ross Complex where human activity is frequent, any generalist wildlife species present are likely already used to human presence and noise. No special-status wildlife species or suitable habitat is present within the project area. Therefore, the proposed action 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 with Conditions

Explanation: No water bodies, floodplains, or special-status fish species are present within the project area. During construction, BMPs would prevent indirect impacts to off-site waterbodies, floodplains, and special-status fish and fish habitat. Therefore, the proposed action would not impact water bodies, floodplains, fish, or fish habitat.

Notes:

- Implement a BPA-approved Erosion and Sediment Control Plan (ESCP) that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: No wetlands are present within the project area. BMPs would be implemented to prevent impacts to off-site wetlands. Therefore, the proposed action would have no effect on wetlands.

Notes:

- Implement a BPA-approved ESCP that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

7. Groundwater and Aquifers

Potential for Significance: No with Conditions

Explanation: The project area occurs within the bounds of the Troutdale Aquifer System. However, ground disturbance is unlikely to reach depths to groundwater or the aquifer. No new wells or other uses of groundwater or aquifers are proposed. BMPs would prevent impacts from unintended spills to groundwater or aquifers. Therefore, the proposed action would not impact groundwater or aquifers.

Notes:

- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The soil sampling and geotechnical investigations would disturb non-vegetated, asphalt surfaces. All bore holes would be refilled with bentonite and cold-patched with bag asphalt following completion of the site characterization and soil testing. Therefore, the proposed action would not impact land use or specially-designated areas, including the nearby historic district.

9. Visual Quality

Potential for Significance: No

Explanation: The soil sampling and geotechnical investigations would disturb non-vegetated, asphalt surfaces. All bores would be refilled following completion of the geotechnical site characterization to restore the area to the current visual quality. Therefore, the proposed action would not impact visual quality of the project area.

10. Air Quality

Potential for Significance: No

Explanation: Construction activities would result in a minor and temporary increase in dust and vehicle emissions in the local area. BMPs, such as turning off vehicles when not in use, would be implemented to limit the amount of emissions released in the local area.

11. Noise

Potential for Significance: No

Explanation: During construction, use of boring equipment would create noise above current ambient conditions. However, noise impacts would be temporary and intermittent and would only occur during typical working hours (approximately 7am to 7pm). Project-related noise would not likely be audible from residential properties surrounding the Ross Complex. There would be no long-term change in ambient noise following completion of the project.

12. Human Health and Safety

Potential for Significance: No

Explanation: Construction would be completed by qualified professionals who would follow all applicable safety requirements as detailed in their BPA-accepted site-specific safety plan, in accordance with BPA Contractor Safety and Health Requirements for Prime and Subcontractors, and any additional state, local, or authority having jurisdiction requirements. The safety plan would be maintained on-site during project activities and updated, as needed. Therefore, the proposed action 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: Soil samples from around the project area and material extracted from geotechnical boring efforts would be tested for hazardous materials, including but not limited to RCRA8, NWTPH-dx and PCBs. After excavation, boring material would be drummed with 1-2 samples taken for each boring location. Soils and boring material would be disposed of off-site according to BPA best management practices in conjunction with local, state, and federal regulations

A qualified industrial hygiene firm would provide sampling services and guidance throughout the project to ensure that hazardous substances or pollutants are not released in an uncontrolled manner.

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 proposed action would occur on BPA fee-owned property. Therefore, no landowner notification, involvement, or coordination would be required.

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

Signed:

Becky Hill
Environmental Protection Specialist