**Proposed Action:** Covington Substation Stairway and Deck Replacement Project

**PP&A Project No.:** 4387

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

**Location:** King County, Washington

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.3 – Routine Maintenance

**Description of the Proposed Action:** The Bonneville Power Administration (BPA) is proposing to remove deteriorating wood decks and stairways and replace them with like-for-like in-situ wood assemblies. This work would be completed at the Covington Substation on the modular office structures (Z1298) and the SPC Maintenance Building (Z0045). The work would entail replacing the existing layout with a similar layout and concrete pier/deck blocks for footing supports would be utilized. There could be minimal ground disturbance in the event the new stair and deck footings require a more solid foundation in which the concrete pier/deck blocks need be placed in ground along with proper compacted base and backfill. The proposed work would occur on BPA-owned land within the substation fence line at Covington substation.

**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, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), BPA has determined that the proposed action:

1. **(1)** fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
2. **(2)** does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
3. **(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/ Treicia Albert
Treicia Albert
Physical Scientist (Environmental)

Concur:

/s/ Katey Grange Date: April 30, 2020
Katey Grange
NEPA Compliance Office

Attachment:
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.

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Project Site Description

The project would take place within the previously disturbed Covington substation yard, which is surrounded by residential and forested land uses. There is a freshwater emergent wetland in the surrounding area about a half mile to the northwest of the project area. The nearest waterbody to the work area is Jenkins Creek, which is about 182 yards from the project work areas.

Evaluation of Potential Impacts to Environmental Resources

<table>
<thead>
<tr>
<th>Environmental Resource Impacts</th>
<th>No Potential for Significance</th>
<th>No Potential for Significance, with Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Historic and Cultural Resources</td>
<td>[✓]</td>
<td>[ ]</td>
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<tr>
<td><strong>Explanation:</strong> BPA historian has reviewed the undertaking and there is no potential to effect.</td>
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<tr>
<td>2. Geology and Soils</td>
<td>[✓]</td>
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<td><strong>Explanation:</strong> Soil disturbance would be limited to areas that have been covered by gravel, asphalt, or concrete already. Some minor ground disturbance may occur if new stair and deck footings need to be installed. Minimal impacts to geology and soils are expected from this project overall.</td>
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<td>3. Plants (including Federal/state special-status species and habitats)</td>
<td>[✓]</td>
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</tr>
<tr>
<td><strong>Explanation:</strong> There is no vegetation in the proposed project area. No plants would be affected by the proposed project.</td>
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<tr>
<td>4. Wildlife (including Federal/state special-status species and habitats)</td>
<td>[✓]</td>
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<tr>
<td><strong>Explanation:</strong> The project area does not include habitat for any special status species or common wildlife. There would be no effect to ESA-listed species in the area.</td>
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<tr>
<td>5. Water Bodies, Floodplains, and Fish (including Federal/state special-status species, ESUs, and habitats)</td>
<td>[✓]</td>
<td>[ ]</td>
</tr>
<tr>
<td><strong>Explanation:</strong> No in-water work is proposed for this project and there are no floodplains present within the proposed work area. Erosion control measures would be used to prevent off-site sediment migration and a non-regulatory erosion control plan (ECP) would be prepared for the project. Therefore, there would be no effect to water bodies, floodplains, and fish.</td>
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<td></td>
</tr>
<tr>
<td>6. Wetlands</td>
<td>[✓]</td>
<td>[ ]</td>
</tr>
</tbody>
</table>
| **Explanation:** The minimal disturbance associated with the proposed project would be contained on site and best
management practices would be used during construction to prevent sediment from migrating off site during ground disturbing activities and to keep concrete washout in designated areas. The project would not affect wetlands.

7. **Groundwater and Aquifers**

   **Explanation**: There would be none to minimal ground excavation that would not be to a depth that would intersect ground water. Best management practices would be used during construction to prevent sediment from migrating off site during ground disturbing activities and to keep concrete washout in designated areas. The project would not affect groundwater or aquifers.

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

   **Explanation**: No change in land use would occur and project activities would not impact land use. No specially designated areas were identified within the project limits.

9. **Visual Quality**

   **Explanation**: The replacement of in-situ stairs and decks would not change the appearance of the substation. There would be no change to the visual quality of the area as a result of the proposed activities.

10. **Air Quality**

    **Explanation**: Some minor vehicle and equipment emissions would be expected during construction. Some very minor dust emissions may also occur during construction. The emissions would be minor and temporary. Minor impacts to air quality are expected from the proposed project.

11. **Noise**

    **Explanation**: Some temporary construction noise would occur during daylight hours. The operational noise of the substation and associated transmission lines would not change.

12. **Human Health and Safety**

    **Explanation**: During project activity all standard safety protocols would be followed. A site-specific health and safety plan would be prepared and implemented to address any hazards during the proposed work. Project activities would not impact human health or 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, if necessary**: NA

- **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**: NA

- **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.**
Exclude genetically engineered organisms, synthetic biology, governmental 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: NA

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**Landowner Notification, Involvement, or Coordination**

Description: BPA owns the substation property.

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

Signed: /s/ *Treicia Albert*  
Treicia Albert  
Physical Scientist (Environmental)  

Date: *April 30, 2020*