Categorical Exclusion Determination
Bonneville Power Administration
Department of Energy

Proposed Action: Sno-King Substation Security Upgrades

Project No.: P03487

Project Manager: Gerri Colburn

Location: Snohomish, Washington


Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to enhance the physical security of the BPA-owned Sno-King 230 kV substation. The work would support BPA’s compliance with the updated North American Electric Reliability Corporation-Critical Information Protection (NERC-CIP) standards, protecting critical assets from theft, vandalism, and terrorism. BPA would replace the existing perimeter fences and gates with new 8-foot-tall cut and climb-resistant steel mesh security fencing topped with razor wire coils. The existing perimeter fence would be expanded in the northwest corner to encompass the current vehicle parking area and communications tower located near the control house. Current vegetation would be removed in this area along with clearing tree limbs as necessary to increase visibility along the new fence line. The northeast corner would also be expanded to the current main driveway and encompass a new vehicle gate, which would restrict access from WA highway 524 to the easternmost vehicle access point into the energized facility. Crushed gravel would be placed in areas incorporated into the northeastern expansion and along the fence line as needed during replacement.

Additionally, security cameras would be mounted to the substation facility, and within the substation yard as appropriate for complete coverage. Cameras would be placed on new arm brackets connected to fence poles throughout the perimeter in order to gain sufficient line of site of the fence line. Cameras could include both standard, thermal, and infrared technology systems. If needed, a security communication rack may be installed inside the basement of the control house with a 2-foot-wide by 3-foot-deep trench proposed for conduit to be installed between the control house and fence line along the substation yard. Equipment used would be a small excavator, brush mower, dump truck, pick-up trucks and hand tools as needed.

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/ Nicholas Johnson
Nicholas Johnson
Environmental Protection Specialist

Concur:

/s/ Katey C. Grange August 17, 2021
Katey C. Grange Date
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:** Sno-King Substation Security Upgrades

**Project Site Description**

The project is located in Snohomish County, Washington, Township 27 North, Range 5 East, and Sections 20 and 21. The site is located directly south of Washington State Highway 524. The BPA fee-owned parcel is amongst neighboring housing developments and has some remaining trees mixed throughout the western boundary. The eastern portion of the parcel is typical high-voltage transmission line corridors, populated with low growing vegetation. In the areas where the perimeter fencing would be expanded, there is some intermixed woody vegetation, surrounding unground utilities, existing fencing, pavement, concreate jersey barriers and gravel pads. No water resources occur within 0.5 mile of the project area. There is a small intermittent wetland area located 100 feet east of the project site.

**Evaluation of Potential Impacts to Environmental Resources**

1. **Historic and Cultural Resources**
   
   Potential for Significance: No
   
   **Explanation:** The proposed project was reviewed by a BPA archaeologist and it was determined that there is no potential to cause effects to historical or cultural resources. BPA archaeologists issued a no potential to cause effects on historic properties memo dated June 30, 2021.

2. **Geology and Soils**

   Potential for Significance: No

   **Explanation:** In all areas of the perimeter fencing, the ground surface has previously been leveled and cleared as part of the substation construction. All excess fill that would be removed for the new fencing structures would be spread and left onsite. Areas not covered by crushed gravel post upgrades would be re-seeded with a native seed mix.

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

   Potential for Significance: No

   **Explanation:** No known special-status plants are located within the project area. Areas that would be cleared of current woody vegetation would be re-seeding using a native pollinator seed mix.

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

   Potential for Significance: No

   **Explanation:** No special-status wildlife species and habitats occur within the project area. Local wildlife may be disrupted during the short construction window of ten days.
5. Water Bodies, Floodplains, and Fish (including Federal/state special-status species, ESUs, and habitats)

Potential for Significance: No

Explanation: No water resources are located within the project area.

6. Wetlands

Potential for Significance: No

Explanation: No wetlands are known to occur within the project area. The small wetland area located the east of the project would not be impacted by the proposed activities.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Proposed project actions would not occur within the groundwater water table or impact aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: Land use would remain the same post project completion. No specially-designated areas are located within the project area.

9. Visual Quality

Potential for Significance: No

Explanation: Visual quality would remain the same post project completion. Areas of cleared vegetation would be re-established with pollinator habitat of native wildflowers.

10. Air Quality

Potential for Significance: No

Explanation: Light dust creation may occur with construction activities and would occur in relatively short periods of time.

11. Noise

Potential for Significance: No

Explanation: Some noise would occur associated with construction activities occurring during daylight hours.

12. Human Health and Safety

Potential for Significance: No

Explanation: Crews would follow all applicable health and safety regulations.
**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*

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**Landowner Notification, Involvement, or Coordination**

**Description:** All work would occur on BPA fee-owned property, no additional landowner notification, involvement or coordination would be needed.

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

Signed: /s/ Nicholas Johnson  
**August 17, 2021**  
Nicholas Johnson, ECT  
Date  
Environmental Protection Specialist