DATE: June 19, 2014

REPLY TO ATTN OF: KEC-4

SUBJECT: Environmental Clearance Memorandum

TO: Molly Kovaka
    TEP-CSB-2

Proposed Action: Alcoa Digital Upgrade in Oregon and Washington

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B4.7 Fiber optic cable

Location: Vancouver, WA

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposed Action: BPA proposes to upgrade its analog communication system to a digital communication system at five existing facilities in Multnomah County, Oregon and Clark County, Washington. The following facilities would be affected:

- Alcoa Substation (Washington)
- Ross Substation (Washington)
- Dittmer Control Center (Washington)
- Clark Public Utilities River Road Generating Plant (Washington)
- St. Johns Substation (Oregon)

The proposed project would involve a number of activities, including replacing communications equipment, wiring, and batteries inside the facilities; replacing an asbestos-tile floor in the battery room at Ross Substation with a non-asbestos material; installing underground fiber optic cable in and around the Ross Substation yard in both existing and new conduit; and leasing existing Clark Public Utilities’ overhead fiber between its River Road Generating Plant and BPA’Ross Substation. The only areas of ground disturbance would be at Ross Substation, where new conduit for fiber optic cable would be installed underground for a total length of 250 feet, connecting two pairs of existing underground utility vaults. The conduit would be bored to a minimum of 36 inches belowground. Ground surface disturbance would occur as a result of driving and parking the directional boring machine, and excavating temporary pits for boring equipment.

Findings: BPA has determined that the proposed action complies with Section 1021.410 and Appendix B of Subpart D 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). The proposed action does not present any extraordinary circumstances that may affect the significance of the
environmental effects of the proposal. The proposal is not connected [40 C.F.R. 1508.25(a)(1)]
to other actions with potentially significant impacts, has not been segmented to meet the
definition of a categorical exclusion, is not related to other proposed actions with cumulatively
significant impacts [40 C.F.R. 1508.25(a)(2)], and is not precluded by 40 C.F.R. 1506.1 or
10 C.F.R. 1021.211. Moreover, the proposed action would not (i) threaten a violation of
applicable statutory, regulatory, or permit requirements for environment, safety, and health,
(ii) require siting and construction or major expansion of waste storage, disposal, recovery, or
treatment facilities, (iii) disturb hazardous substances, pollutants, contaminants, or
Comprehensive Environmental Response, Compensation and Liability Act-excluded petroleum
and natural gas products that pre-exist in the environment such that there would be uncontrolled
or unpermitted releases, (iv) have the potential to cause significant impacts on environmentally
sensitive resources, or (v) 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.

Based on the provisions identified on the attachment, this proposed action meets the
requirements for the Categorical Exclusion referenced above.

/s/ Kara Hempy-Mayer
Kara Hempy-Mayer
Environmental Project Manager

Concur:

/s/ Katherine S. Pierce              Date: June 19, 2014
Katherine S. Pierce
NEPA Compliance Officer

Attachment(s):
Environmental Checklist for Categorical Exclusions
Provisions
ATTACHMENT

PROVISIONS

This categorical exclusion will meet the following provisions:

- Lead paint and asbestos-mastic vinyl tile in the Ross Substation control house battery floor will be handled and disposed of according to all applicable regulations and notification and reporting requirements, including those administered under the Environmental Protection Agency (EPA), Occupational Safety and Health Administration Department of Labor (OSHA), Washington Industrial Safety and Health Act (WISHA), State of Washington Bureau of Labor and Industries, and Washington Southwest Clean Air Agency (SWCAA).
# Environmental Checklist for Categorical Exclusions

**Name of Proposed Project:** Alcoa Digital Upgrade in Oregon and Washington  
**Work Order #:** 342964

This project does not have the potential to cause significant impacts on the following environmentally sensitive resources. See 10 CFR 1021, Subpart D, Appendix B for complete descriptions of the resources. This checklist is to be used as a summary – further discussion may be included in the Categorical Exclusion Memorandum.

<table>
<thead>
<tr>
<th>Environmental Resources</th>
<th>No Potential for Significance</th>
<th>No Potential, with Conditions (describe)</th>
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</thead>
<tbody>
<tr>
<td>1. Historic Properties and Cultural Resources</td>
<td><strong>X</strong></td>
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<tr>
<td>No effect determination based on review, survey, and consultation with Wash. Department of Archaeology and Historic Preservation (DAHP), Ore. State Historic Preservation Office (SHPO), and the following tribes: The Confederated Tribes of Grand Ronde, the Confederated Tribes of Siletz, the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes and Bands of the Yakama Nation, and the Cowlitz Indian Tribe. BPA received concurrence from WA DAHP on 3/17/14 and from OR SHPO on 3/26/14.</td>
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<td>2. T &amp; E Species, or their habitat(s)</td>
<td><strong>X</strong></td>
<td></td>
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<tr>
<td>No effect determination based on no suitable habitat present for T &amp; E species that have the potential to occur in Multnomah and Clark counties.</td>
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<td>3. Floodplains or wetlands</td>
<td><strong>X</strong></td>
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<tr>
<td>Alcoa Substation and the River Road Generating Plant are both within the 100-year floodplain of the Columbia River (other project sites do no occur within a floodplain). Because project activities would occur inside existing buildings, there would be no impact to the floodplain. No wetlands occur in the affected area.</td>
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<td>4. Areas of special designation</td>
<td><strong>X</strong></td>
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<td>There are no areas of special designation in the affected areas.</td>
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<td>5. Health &amp; safety</td>
<td><strong>X</strong></td>
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<td>Workers would follow BPA standards for health and safety during project activities. In addition, removal and disposal of lead paint and the asbestos-mastic vinyl tile would follow all applicable regulations (see Provisions).</td>
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<td>6. Prime or unique farmlands</td>
<td><strong>X</strong></td>
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<tr>
<td>Because project activities occur in existing buildings or on developed substation property, there would be no impacts to prime or unique farmlands.</td>
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<td>7. Special sources of water</td>
<td><strong>X</strong></td>
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<tr>
<td>The St. Johns Substation is about 1 mile from the Willamette River, the Alcoa Substation and River Road Generating Plant are about 0.5 mile from the Columbia River, and the Ross Substation and Dittmer Control Center are about 2.5 miles from the Columbia River. Because project activities occur in existing buildings or on developed substation property, there would be no impacts to these waterbodies.</td>
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<td>8. Other (describe)</td>
<td><strong>X</strong></td>
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<tr>
<td>No other environmental resources would be affected by the proposed project</td>
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</tbody>
</table>

Signed: /s/ Kara Hempy-Mayer  
Date: June 19, 2014