Proposed Action: NERC-CIP Security Upgrades

Project Manager: Christopher Bachman, TEP-CSB-2

Location: Multiple locations within Bonneville Power Administration’s (BPA) service area

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B2.5 Facility safety and environmental improvements

Description of the Proposed Action: BPA proposes to install security systems on the control houses at several substations across the states of Montana, Oregon, and Washington. The work would be done to bring the substations into compliance with security standards established by the North American Electric Reliability Corporation’s Critical Infrastructure Protection (NERC-CIP).

Work at these sites would include some or all of the following types of actions:

- Installing card readers on exterior pedestrian doors. Card reader pin pads would be installed on the interior and exterior of the main egress doors;
- Running surface-mounted conduit from card readers through floors or ceilings from door locations to security racks located near existing communication racks;
- Installing new security racks/enclosures to walls or floors (depending on site design) in the communication rooms;
- Installing fire-rated doors with card readers on access tunnels between the control house and substation yard;
- Installing additional security hardware such as motion detectors, glass break detectors, interior visitor key pads, and new door hardware.

All work would take place within the control house or relay house and no interior walls would be moved or altered. The project would not involve any ground disturbing activities. For specific substations included in the project, refer to Table 1 and Table 2.

Table 1. Non-historic Substations

<table>
<thead>
<tr>
<th>Non-Historic Substation</th>
<th>County</th>
<th>State</th>
<th>Township/Range/Section</th>
</tr>
</thead>
<tbody>
<tr>
<td>Columbia Falls 115-kV Yard</td>
<td>Flathead</td>
<td>MT</td>
<td>30N 20W Sec 15</td>
</tr>
<tr>
<td>Flathead</td>
<td>Flathead</td>
<td>MT</td>
<td>29N 21W Sec 30</td>
</tr>
<tr>
<td>Historic-Eligible Substation</td>
<td>County</td>
<td>State</td>
<td>Township/Range/Section</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>------------</td>
<td>-------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Columbia Falls 230-kV Yard</td>
<td>Flathead</td>
<td>MT</td>
<td>30N 20W Sec 15</td>
</tr>
<tr>
<td>La Grande</td>
<td>Union</td>
<td>OR</td>
<td>3S 36E Sec 9</td>
</tr>
<tr>
<td>Redmond</td>
<td>Deschutes</td>
<td>OR</td>
<td>15S 13E Sec 18</td>
</tr>
<tr>
<td>Roundup</td>
<td>Umatilla</td>
<td>OR</td>
<td>2N 32E Sec 24</td>
</tr>
<tr>
<td>The Dalles</td>
<td>Wasco</td>
<td>OR</td>
<td>2N 13E Sec 32</td>
</tr>
<tr>
<td>Boundary</td>
<td>Pend Oreille</td>
<td>WA</td>
<td>10N 13E Sec 10</td>
</tr>
<tr>
<td>Murray</td>
<td>Snohomish</td>
<td>WA</td>
<td>31N 6E Sec 19</td>
</tr>
</tbody>
</table>

**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) 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/ Hannah Sharp  
Hannah Sharp  
Contract Environmental Protection Specialist  
CorSource Technology Group

Reviewed by:

/s/ Gene Lynard  
Gene Lynard  
Supervisory Environmental Protection Specialist

Concur:

/s/ Katherine S. Pierce  
Katherine S. Pierce  
NEPA Compliance Officer  
Date: October 3, 2014

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: NERC-CIP Security Upgrades

Project Site Description

All work would take place within the control houses or relay houses at multiple substations on BPA fee-owned property in Montana, Oregon, and Washington. All project areas have been previously disturbed.

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>
</tr>
<tr>
<td><strong>Explanation:</strong> MT SHPO concurrence on no adverse effect determination 9/5/14. OR SHPO concurrence on no adverse effect determination 9/15/14. WA SHPO concurrence on no adverse effect determination 8/25/14. Determination from Tribal Affairs that project would not potentially affect tribal resources 7/15/14.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Geology and Soils</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Explanation:</strong> No ground disturbance proposed. All work in control houses or relay houses within previously disturbed substation yards.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Plants (including federal/state special-status species)</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Explanation:</strong> All work in existing substation yards. Areas previously disturbed and no plants present.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Wildlife (including federal/state special-status species and habitats)</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Explanation:</strong> All work in existing substation yards. No habitat present.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Water Bodies, Floodplains, and Fish (including federal/state special-status species and ESUs)</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Explanation:</strong> No in-water work. No work proposed within a floodplain.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
6. **Wetlands**

   |   |   |
   --------
   ✓ |   |

   **Explanation:** No wetlands present in project areas.

7. **Groundwater and Aquifers**

   |   |   |
   --------
   ✓ |   |

   **Explanation:** No ground disturbance proposed.

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

   |   |   |
   --------
   ✓ |   |

   **Explanation:** All work in existing substation yards.

9. **Visual Quality**

   |   |   |
   --------
   ✓ |   |

   **Explanation:** All work would take place inside existing control houses or relay houses.

10. **Air Quality**

    |   |   |
    --------
    ✓ |   |

   **Explanation:** Proposed work would not generate dust or vehicle/equipment emissions and would not require air quality permits.

11. **Noise**

    |   |   |
    --------
    ✓ |   |

   **Explanation:** Temporary construction noise during daylight hours. Operational noise would not change.

12. **Human Health and Safety**

    |   |   |
    --------
    ✓ |   |

   **Explanation:** No known soil contamination or hazardous conditions at project locations.

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**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:**

- 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:**

- 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.
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.

Landowner Notification, Involvement, or Coordination

Description: No notification. All work on BPA fee-owned property and no visual or other effects to adjacent landowners.

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

Signed: /s/ Hannah Sharp
Hannah Sharp, KEC-4

Date: October 3, 2014