Categorical Exclusion Determination
Bonneville Power Administration
Department of Energy

**Proposed Action:** Celilo Roof Fall Protection

**Project No.:** P01240

**Project Manager:** Jody Solmonsson

**Location:** Wasco County, OR

**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 is proposing to install railings along the roof of the Celilo DC Converter Station to improve the safety of personnel working on the roof, mainly when accessing the HVAC systems from the rooftop door. Composed of steel, approximately 44.5 inches in height, and with an approximate diameter of 1.5 inches, the rails would total about 150 feet in length along various portions of the roof. Approximately 56 feet of the rail would be a permanent installation, with the remainder being a linked-section convertible system.

**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/ Michael J. O’Connell  
Michael J. O’Connell  
Environmental Protection Specialist

Concur:

/\s/ Stacy L. Mason  
Stacy L. Mason  
NEPA Compliance Officer

Date: December 7, 2015

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:** Celilo Roof Fall Protection

### Project Site Description

The Celilo DC Converter Station Control House was built in 1970 and is unique in the Bonneville transmission system making it a special historic resource. It is the northern terminus of the Direct Current Intertie - one of the world's longest and highest-capacity DC transmission systems. The station exists to convert from the standard AC power of the system. Part of the Starr Complex at Celilo, the site is 1.2 miles southeast of the Columbia River in Wasco County, Oregon.

### 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><strong>1. Historic and Cultural Resources</strong></td>
<td>✔</td>
<td>[ ]</td>
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<tr>
<td><strong>Explanation:</strong> Because the work would result in no permanent structural or architectural modification to the building, and result in no ground disturbing activities, BPA cultural resources staff determined that this is a type of activity that would not have the potential to cause effects to historic properties, per 36 CFR 800.3(a). The Section 106 review determination is <em>no potential to affect.</em></td>
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<td><strong>2. Geology and Soils</strong></td>
<td>✔</td>
<td>[ ]</td>
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<tr>
<td><strong>Explanation:</strong> All work would be on the roof of the control house: no resource disturbance is expected outside of this zone.</td>
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<tr>
<td><strong>3. Plants</strong> (including federal/state special-status species)</td>
<td>✔</td>
<td>[ ]</td>
</tr>
<tr>
<td><strong>Explanation:</strong> All work would be on the roof of the control house: no resource disturbance is expected outside of this zone.</td>
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<tr>
<td><strong>4. Wildlife</strong> (including federal/state special-status species and habitats)</td>
<td>✔</td>
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<td><strong>Explanation:</strong> All work would be on the roof of the control house. There is no critical habitat nearby. There is overlapping occurrence of the federally-listed species of concern, the Columbia pebblesnail, but no impacts to the snail can be expected from the roof work.</td>
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<tr>
<td><strong>5. Water Bodies, Floodplains, and Fish</strong> (including federal/state special-status species and ESUs)</td>
<td>✔</td>
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<tr>
<td><strong>Explanation:</strong> All work would be on the roof of the control house and there would be no changes to total impervious surfaces.</td>
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</tbody>
</table>
6. **Wetlands**

   **Explanation:** All work would be on the roof of the control house: no resource disturbance is expected outside of this zone.

7. **Groundwater and Aquifers**

   **Explanation:** All work would be on the roof of the control house: no resource disturbance is expected outside of this zone.

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

   **Explanation:** The Starr Complex is located within the Columbia River Gorge National Scenic Area, but the land-use designation for the purposes of the CRGNSA Management Plan and Scenic Act is ‘Urban’ and therefore this project is exempt from CRGNSA Management Plan consistency review.

9. **Visual Quality**

   **Explanation:** The proposed addition of the roof fall protection railings would not be inconsistent with the visual appearance of the building. Plain, of steel construction, and about 44.5” in height, the rails would not detract from the overall aesthetics of the building and would be consistent with the CRGNSA ‘urban’ land-use.

10. **Air Quality**

    **Explanation:** The project would have no impact on air quality.

11. **Noise**

    **Explanation:** There would be short-lived noise associated with the installation of the railings. This would be during regular working daylight hours.

12. **Human Health and Safety**

    **Explanation:** There should be beneficial impacts to human safety while typical work is being performed in the railing zones.

### 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.
Explanation, if necessary:

☑️ 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, if necessary:

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**Landowner Notification, Involvement, or Coordination**

Description: The Celilo DC Converter Station Control House is a BPA-owned facility on BPA fee-owned land. Because there would be no resource or visual impacts or disruption to adjacent landowners, further notification is not warranted.

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

Signed: /s/ Michael J. O’Connell

Date: December 7, 2015

Michael J. O’Connell, KEC-4