DATE: September 3, 2014

REPLY TO ATTN OF: KEC-4

SUBJECT: Environmental Clearance Memorandum

TO: Mike Marleau
    Project Manager – TEP-TPP-1

**Proposed Action:** Puget Sound Area Northern Intertie-Covington and Raver substation upgrades

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.3, Routine Maintenance, B1.24 Property transfers, B4.11 Electric power substations and interconnection facilities

**Location:** Covington and Ravensdale, King County, Washington

**Proposed by:** Bonneville Power Administration (BPA)

**Description of the Proposed Action:** BPA proposes several improvements at the Covington and Raver substations in King County, Washington as part of the Puget Sound Area Northern Intertie (PSANI) project. In addition to the work described in the previous categorical exclusion for this project (August 7, 2014), BPA proposes the following improvements at Raver Substation

- Replace the existing 180 megavolt ampere reactive (MVAR) bank with a new 300 MVAR bank. Replacement would involve installing oil containment, adding additional reactor pads, extending the bus, adding 396-kilovolt (kV) and station class metal oxide surge arrestors, installing a new three phase cabinet and cable, purchasing and installing three single phase 300 MVAR reactors.
- Replace load break disconnect switch with breaker rated 50 kilo amps (KA) interrupting and 3,000 amp continuous. The breaker would have point on wave switching. Replace all associated relays that do not meet current design.
- Re-spread the reactors in Banks 3 and 4. This work would involve installing oil containment, adding additional reactor pads, extending the bus, and replacing the control cables.
- Replace and install relay cables within the substation yard.

**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 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. We therefore determine that the proposed action may be categorically excluded from further NEPA review and documentation.

/s/ Justin T. Moffett
Justin T. Moffett
Environmental Project Manager

Concur:

/s/ Katherine S. Pierce Date: September 3, 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:

Cultural Resources
In the event any archaeological or historical material is encountered during project activities, the following actions should be taken:

- Stop work in the vicinity and immediately notify the BPA environmental lead, a BPA archaeologist, appropriate BPA project staff, interested Tribes, Washington State Department of Archaeology and Historic Preservation, and the appropriate county, state, and federal agencies.
- Implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering.
- Take reasonable steps to ensure the confidentiality of the discovery site, including restricting access.
Environmental Checklist for Categorical Exclusions

Name of Proposed Project: Puget Sound Area Northern Intertie- Covington and Raver substation upgrades

Work Order #: 00319592, 00319588, 00310745, 00310746, 00343826, 00303984, 00304163

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>
</tr>
</thead>
<tbody>
<tr>
<td>1. Historic Properties and Cultural Resources</td>
<td>X</td>
<td></td>
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<tr>
<td>Washington State Department of Archaeology and Historic Preservation (DAHP) issued concurrence on October 28, 2013. BPA reinitiated consultation with DAHP in April 2014 due to addition of the eastern access road reconstruction to project scope. DAHP issued supplemental concurrence on July 10, 2014. BPA shall implement inadvertent discovery protocol in the event cultural resources are encountered during project construction.</td>
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<tr>
<td>2. T &amp; E Species, or their habitat(s)</td>
<td>X</td>
<td></td>
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<tr>
<td>None present.</td>
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<tr>
<td>3. Floodplains or wetlands</td>
<td>X</td>
<td></td>
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<tr>
<td>None present.</td>
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<td>4. Areas of special designation</td>
<td>X</td>
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<tr>
<td>None present.</td>
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<td>5. Health &amp; safety</td>
<td>X</td>
<td></td>
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<tr>
<td>None present.</td>
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<td>6. Prime or unique farmlands</td>
<td>X</td>
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<tr>
<td>None present.</td>
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<td>7. Special sources of water</td>
<td>X</td>
<td></td>
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<tr>
<td>None present.</td>
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<td>8. Other (describe)</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

Signed: /s/ Justin Moffett                     Date: September 3, 2014