

# CATEGORICAL EXCLUSION DETERMINATION



Western Area  
Power Administration  
Rocky Mountain Region

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## **Proposed Action Title: Blanket CX for Routine Maintenance Activities at Existing Substations and Switchyards**

**Location: Arizona, Colorado, Montana, Nebraska, New Mexico, Utah, and Wyoming**

**Project Number: 2021-035**

**Expiration Date: December 31, 2026**

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### **A. PROPOSED ACTION DESCRIPTION:**

The Western Area Power Administration (WAPA), Rocky Mountain Region (RMR), conducts routine maintenance activities at existing substations and switchyards in seven states (Arizona, Colorado, Montana, Nebraska, New Mexico, Utah, and Wyoming). These substations and switchyards are surrounded by a security fence and the entire area within this fenced perimeter has been previously disturbed by the installation of an electric ground mat installed several feet below the ground surface and covered with compacted fill material and gravel.

The following activities occurring **within the existing fenced perimeter of a substation or switchyard** are covered by this Categorical Exclusion (CX):

- (1) Maintenance and replacement of transformers and breakers;
- (2) Maintenance and replacement of battery banks;
- (3) Maintenance, servicing, and testing of equipment;
- (4) Installation and replacement of bushings;
- (5) Cleaning and replacement of capacitor banks;
- (6) Maintenance and installation of above ground propane tanks;
- (7) Replacement of wiring;
- (8) Replacement of equipment;
- (9) Installation of fuses;
- (10) Adjustment and cleaning of disconnect switches;
- (11) Cleanup of spills that don't reach reportable quantities, as defined by the RMR Spill Response Plan (SRP);
- (12) Repair and replacement of ground mats, not to exceed current depth of disturbance;
- (13) Replacement and repair of footings for electrical or communications equipment, not to exceed current depth of disturbance;
- (14) Any ground disturbing activity, not to exceed current depth of disturbance;
- (15) Maintenance and repair of buildings and structures less than 45 years old;
- (16) Substation control building upgrades;
- (17) Pest management within buildings;
- (18) Installation and maintenance of portable sanitary facilities;
- (19) Maintenance, installation, and removal of a solar power array panel and controller from structures; and
- (20) Installation, relocation, and removal of new poles, cable trays, and associated equipment.

The following activities occurring **within the existing fenced perimeter of a substation or switchyard and up to six (6) feet outside the fenced perimeter** are covered by this CX:

- (21) Activities to manage nuisance wildlife as covered under Interagency Agreements between RMR and the U.S. Department of Agriculture (USDA) Wildlife Services;
- (22) Repair, replacement, and removal of existing fences and gates, where existing postholes are reused and no new postholes are required;
- (23) Vegetation management including controlled burns and herbicide application;
- (24) Grounds maintenance including snowplowing, mowing, and servicing septic tanks;
- (25) Erosion control projects, not to exceed current depth of disturbance;
- (26) Maintenance of existing spill containment, control, and countermeasure (SPCC) structures;
- (27) Placing rocks and fill around existing culverts, provided the material is brought in from a commercial source and ground disturbance is not necessary; and
- (28) Other closely related activities that have little or no environmental or cultural resource impacts or regulated materials concerns as determined by RMR's Environment Department **(requires submission of a Project Initiation Form [PIF] per Stipulation B.2).**

## B. STIPULATIONS PERTAINING TO PROPOSAL:

- 1) Activities listed in **Section A, Items 1 through 27**, that will adhere to all Stipulations in Section B **do not require submission of a PIF** to RMR's Environment Department.
- 2) Activities listed in Section A, Items 1 through 27, that will not adhere to all Stipulations in Section B, and other closely related activities (**Section A, Item 28**), **require submission of a PIF** to RMR's Environment Department. If approved, RMR's Environment Department will provide written approval for use of this CX.
- 3) **This CX is valid until December 31, 2026**, or until an updated version is executed by RMR's Environment Department, whichever comes first.
- 4) Any injured or orphaned birds and all observed active nests must be immediately reported to RMR Environment at (970) 593-8803 or (970) 342-6462. Any dead birds must be reported to RMR Environment within twenty-four (24) hours of discovery. Additional documentation, such as photographs and GPS coordinates, may be requested to support RMR's reporting requirements to the U.S. Fish and Wildlife Service.
- 5) If any cultural resources are inadvertently discovered during implementation of the proposed action, work within 100 feet of the discovery area must halt immediately, and an RMR Archaeologist must be contacted immediately at (970) 302-4753 or (970) 286-3523. Work in the area of discovery must not resume until written notification to proceed is provided by an RMR Archaeologist.



- 6) If any possible human remains are inadvertently discovered during implementation of the proposed action, work within 100 feet of the discovery area must halt immediately, and an RMR Archaeologist must be notified immediately at (970) 302-4753 or (970) 286-3523 (no later than 24 hours from the time of discovery). A reasonable effort must be made to protect the remains from looting and/or further damage. Work in the area of discovery must not resume until written notification to proceed is provided by an RMR Archaeologist.
- 7) Pesticide and herbicide applicators must meet all state licensing requirements and must follow all applicable federal, state, and local laws, regulations, and guidelines. Applicators must use only EPA-registered pesticides and herbicides that are approved for the intended use and location, and must follow all applicable label directions.
- 8) Installation of equipment in substations must conform to WAPA's requirements and must be approved by WAPA. Oil-filled equipment, including bushings, must not contain polychlorinated biphenyls (PCB). In addition, oil-filled equipment must be permanently labeled by the manufacturer as No-PCB. Certification must be provided to RMR's Environment Department at or before the time of installation. Oil-filled equipment may require an oil spill containment system to comply with federal or state regulations.
- 9) For facilities covered by a current Spill Prevention, Control, and Countermeasure (SPCC) plan, RMR's Environment Department must be notified prior to the installation, replacement, or removal of any oil-containing equipment, or placement of fill material to ensure activities are in compliance with the requirements of the SPCC plan.
- 10) Activities involving the use of fuel, oil, hydraulic fluid, or other petroleum products must comply with RMR's Spill Response Plan (SRP).
- 11) Handling and disposal of lead-based paint, asbestos, PCB, and other environmentally regulated materials must comply with local, State, and Federal regulations.
- 12) To prevent the transport of non-native and invasive plants and animals, including noxious weeds and aquatic nuisance species, work crews must thoroughly wash all vehicles and equipment (trailers, trucks, UTVs, etc.) before entering the action area and working on the project.

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**C. NUMBER AND TITLE OF THE CATEGORICAL EXCLUSION BEING APPLIED:**

(See text in 10 CFR 1021, Subpart D.)

B1.3 Routine maintenance

B1.7 Electronic Equipment

B1.11 Fencing

B1.15 Support Buildings

B1.22 Relocation of Buildings

B1.27 Disconnection of Utilities

B1.28 Placing a Facility in an Environmentally Safe Condition

B1.31 Installation or Relocation of Machinery and Equipment



B1.33 Stormwater Runoff Control  
 B2.1 Workplace Enhancements  
 B2.2 Building and Equipment Instrumentation  
 B2.3 Personnel Safety and Health Equipment

B2.5 Facility Safety and Environmental  
 Improvements  
 B4.6 Additions and Modifications to  
 Transmission Facilities  
 B5.6 Oil Spill Cleanup

**D. REGULATORY REQUIREMENTS 10 CFR 1021.410 (b):** (See full text in regulation)

The proposed action fits within a class of actions that is listed in Appendix A or B of 10 CFR 1021.

To fit within the classes of actions listed in Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of the Department of Energy (DOE) or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances; pollutants; contaminants; or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR 1021, Subpart D, Appendix B; (5) 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.

There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.

The proposal has not been improperly segmented, and the proposal is not connected to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts, and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.



**E. DETERMINATION:**

Based on my review of information conveyed to me and in my possession (or attached) concerning the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1B), I have determined that the proposed action fits within the specified class(es) of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

**JAMES  
WOOD**

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JAMES WOOD  
Date: 2021.03.04  
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Signature and Date

James Wood  
NEPA Compliance Officer  
Rocky Mountain Region  
Western Area Power Administration

