Proposed Action: Tacoma Substation Security Upgrades (Update to previous CX issued on April 21, 2021)

Project Manager: Gerri Colburn—TEPF-CSB-2

Location: Pierce County, Washington

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.3 Routine Maintenance

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to remove an existing 7-foot-tall chain-link fence surrounding the Tacoma Substation and replace it with a new 8-foot-tall chain-link fence (2,632 linear feet). Four (4) 4-foot-wide pedestrian gates, three 10-foot-wide gates, one 15-foot-wide double gate, and five 20-foot-wide double swing gates would also be installed. Due to soil conditions and the potential for liquefaction, deeper footings would be necessary; the gate footings would be 2 feet in diameter by 17 feet deep, the fence post footings would be 2 feet in diameter by 9 to 9.5 feet deep. Three inches of aggregate rock would be added along a 6-foot-wide perimeter of the new fence. The fence would be realigned slightly along the northeast corner, along the eastern property boundary and near the control house. A new 47-foot cantilever gate would be installed at the entrance to the control house parking lot. In conjunction with this gate installation, approximately 34-feet of asphalt would be replaced. A security card reader would be installed nearby, along with new bollards to protect the equipment; the maximum depth of disturbance would be 36-inches. An approximate 4-foot-wide by 3-foot-deep by 250-foot-long trench would be excavated to install power conduit from the control house to the new card reader.

This CX has been updated to include removal of up to 400 feet of unused railroad track, in order to install the grounding mat under the new gate entrance to the substation yard and the property perimeter fence. The railroad track poses a potential hazard because of its proximity to the grounding conductors. After removal of the railroad track and installation of the grounding mat, gravel or pavement would back fill the area.

Two 20-foot-tall poles would also be installed to mount security cameras to. The poles would have a 2-foot-diameter by 12-foot-deep footing. Approximately 250 feet of additional trenching would occur (4-feet wide by 3-feet deep) to install power conduit from the control house to the new pole locations.

An additional fence (783 linear feet) would be installed inside the substation to separate the energized yard from the laydown yard. An existing concrete pad would be removed from the path of the new interior fence location.

Approximately 6 inches of aggregate rock would be added to the southeast corner of the yard to bring it up to grade.
Five mature cottonwood trees (*Populus balsamifera* ssp. *trichocarpa*) on the east side of the substation parking lot would be removed to eliminate security risks.

**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, Jul. 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/ Beth Belanger  
Beth Belanger  
Environmental Protection Specialist

Concur:

/s/ Katey C. Grange  
Katey C. Grange  
NEPA Compliance Officer  
August 17, 2022

Attachment: 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:** Tacoma Substation Security Upgrades

**Project Site Description**

The proposed project is at BPA’s Tacoma Substation in the Port of Tacoma in Pierce County, Washington. The substation is in Section 1, Township 20 North, Range 3 East and Section 36, Township 21 North, Range 3 East. The surrounding area is heavily developed as an industrial zone. The Puget Sound is approximately 0.20 miles west of the project location.

The site is in the Hylebos Creek—Frontal Commencement Bay watershed. There are wetlands to the east and west of the Tacoma Substation; however no proposed project activities would occur in the wetlands.

Vegetation in the project area includes, but is not limited to, approximately five mature cottonwood (*Populus balsamifera ssp. trichocarpa*) trees; madrone (*Arbutus menziesii*), red alder (*Alnus rubra*) and Douglas fir (*Pseudotsuga menziesii*) saplings; Indian plum (*Oemleria cerasiformis*), Oregon grape (*Berberis nervosa*), golden rod (*Solidago canadensis*), pearly everlasting (*Anaphalis margaritacea*), yarrow (*Achillea millefolium*), narrowleaf plantain (*Plantago lanceolata*), St. Johns wort (*Hypericum perforatum*), Himalayan blackberry (*Rubus armenicus*) and Scotch broom (*Cytisus scoparius*).

**Evaluation of Potential Impacts to Environmental Resources**

1. **Historic and Cultural Resources**

   Potential for Significance: No

   **Explanation:** On August 13, 2019, BPA initiated Section 106 consultation with the Puyallup Tribe of Indians Chairperson and Tribal Historic Preservation Office (THPO). BPA then conducted a thorough cultural review, including an archaeological survey and provided letters to the Puyallup Tribal chairperson and THPO concluding that the project would have no adverse effect to historical resources. No responses were received from the Puyallup Tribe for either the initiation or determination of effect notifications.

   Removal of the railroad track has been reviewed by BPA historic and cultural staff and it was determined that the work area was included in the original cultural survey and would not require additional surveys or consultation.

2. **Geology and Soils**

   Potential for Significance: No

   **Explanation:** During construction, all appropriate Best Management Practices would be used to implement site-specific erosion and sediment control. Excavated spoils would be disposed of in a BPA-approved upland location.
3. Plants (including Federal/state special-status species and habitats)

Potential for Significance: No

Explanation: There are no Federal/state-listed plants at the project locations; therefore, there would be no impacts to special-status plants. Five mature cottonwood trees would be removed from the eastern portion of the substation parking lot. Native vegetation in the understory would be retained.

4. Wildlife (including Federal/state special-status species and habitats)

Potential for Significance: No with Conditions

Explanation: There are no known occurrences of Federal/state special-status species on the subject parcel. The site does not have high quality habitat; however, a small patch of trees and vegetation would be removed.
Notes: Trees would be cleared between September and March, to avoid impacts to nesting migratory birds.

5. Water Bodies, Floodplains, and Fish (including Federal/state special-status species, ESUs, and habitats)

Potential for Significance: No

Explanation: Approximately 200 feet of the fence replacement is in a 100-year flood zone. The activities occurring in the flood zone would not impede the flow of floodwaters; nor would significant amounts of impervious surfaces be added that would prevent flood waters from being absorbed into the ground there. Therefore, there would be no impacts to floodplains.

The project would not impact water bodies or fish.

6. Wetlands

Potential for Significance: No

Explanation: The project is not occurring in wetlands. There are delineated wetlands nearby in the transmission right-of-way, to the east of the substation. Vehicles and equipment would be restricted from those areas.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The groundwater at the site is approximately 6 to 8 feet below-ground surface. Groundwater at this location is extremely variable as it is both seasonally and tidally influenced. The project is planned for mid to late summer, when the water table is the lowest, to minimize contact with groundwater. The construction contractor would be required to develop a dewatering plan prior to construction.

The groundwater at the eastern portion of the adjacent transmission right-of-way is known to have concentrations of vinyl chloride and cis-1, 2, -dichloroethene in exceedance of Washington's Model Toxic Control Act (MTCA) Method C and B limits, respectively. This contamination is known to exist to the east of the proposed project area, and due to groundwater flow directions, it is unlikely that groundwater encountered during project activities would contain concentrations of these constituents in exceedance of MTCA limits. The Remedial Project Manager at Washington State Department of Ecology was consulted.
for another project occurring at this location, and has agreed that there is a low potential to encounter contamination.

Spill prevention measures would be utilized during construction activities. The project would not provide a pathway for groundwater contamination.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The land use would not change at the project site. Additionally, the project is not within, or near, any specially-designated area, such as National Scenic Rivers.

9. Visual Quality

Potential for Significance: No

Explanation: The visual quality would not change at the site. The project area is a large electrical substation and electrical transmission right-of-way, surrounded by industrialized development.

10. Air Quality

Potential for Significance: No

Explanation: A small amount of dust and vehicle emissions would occur during construction; however, there would be no significant changes to air quality during, or after, construction.

11. Noise

Potential for Significance: No

Explanation: Construction noise would be temporary and would occur during daylight hours. Operation noise would not change.

12. Human Health and Safety

Potential for Significance: No

Explanation: During project activities, all standard safety protocols would be followed. Project activities would not impact human health or safety.

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: N/A
Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation: N/A

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: N/A

Involves 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: N/A

**Landowner Notification, Involvement, or Coordination**

Description: The project site is on BPA fee-owned property, and the adjacent properties are industrial-use; therefore, landowner notification or coordination is not warranted.

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

Signed: /s/ Beth Belanger August 17, 2022
Beth Belanger, ECT-4 Date
Environmental Protection Specialist