

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Physical Security System Upgrade at Olympia Substation

Project No.: P06657

Project Manager: Rob Moriarty, TEGB-CSB-2

Location: Thurston County, WA

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B1.3 Routine Maintenance, B1.11 Fencing, B2.2 Building and equipment installation

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to upgrade the physical security system at BPA's Olympia Substation to support NERC CIP-006 and CIP-014 compliance. Work would occur within existing substation property and would involve replacement and enhancement of existing security infrastructure, new foundations for fence posts and security poles, and localized trenching and building modifications necessary to support the upgraded physical security system.

All ground disturbance including fence replacement, security pole installation, and trenching, would occur within areas previously disturbed by the installation of the existing perimeter fence and substation yard. Site access would occur through existing paved or gravel roads. Prior to ground-disturbing work, BPA would install stormwater controls, including sediment fencing around the perimeter fence and catch basin inserts within the inlets of the substation's existing stormwater control system. Areas for equipment staging, material stockpiles, and a concrete washout station would be installed within the substation yard, along with appropriate controls to contain and manage any stormwater runoff or accidental leakages.

BPA would demolish the existing 7-foot-tall chain-link perimeter fence and install approximately 6,200 linear feet of 8-foot-tall, medium security steel mesh fence in the same location. Demolition work would occur within a 5-foot-wide area surrounding the existing perimeter fence, and materials would be temporarily stockpiled in designated areas. Within the demolition area, existing switchyard rock would be removed and stockpiled. Existing fence posts and in-ground concrete footings (25 inches by 5 feet deep) would be excavated out, and larger concrete footings (30 inches wide by 9 feet deep) would be installed via auger to support the taller fence. Existing gates would be removed and replaced with the following: five 4-foot-wide double personnel gates, six 20-foot-wide manual swing gates, one 30-foot-wide double swing gate, one 20-foot-wide automated cantilever gate, and one 10-foot-wide cattle gate. Three-inch-deep switchyard rock would be added and extend 6 feet from new fence for stability and grounding protection. The demolished fence posts, concrete foundations, and stockpiled switchyard rock that is not clean enough to re-use would be disposed of offsite. The fence mesh and gates may be salvaged with first right of refusal to BPA. BPA would test soils for contaminants prior to construction and arrange for appropriate disposal.

Approximately 4,000 linear feet of mechanical trenching, approximately 1 foot wide by 2 feet deep, would be used to install new power and fiber conduits and to provide grounding upgrades for the replacement fencing. Grounding would be tied into the existing yard ground grid. New trenching would be minimized by routing through existing tunnels and duct banks wherever feasible.

Fifteen 20-foot-tall structural-steel security poles would be installed around the substation perimeter to mount exterior security cameras and related equipment. Security poles would be mounted on drilled piers that are 3 feet in diameter and embedded 9.5 feet deep. Each security pole would be served by four 2-inch conduits, two routed back to the control house, and two routed to a yard power panel to support power and communications to the cameras and security devices.

Within the control house, Maintenance Headquarters, Heavy Mobile Equipment Mechanic building, and IT Warehouse buildings, the project would upgrade and expand the existing electronic security systems, including physical access control, intrusion detection, and video assessment. New security control cabinets, racks, emergency power supplies would be installed with associated conduit and cabling. In addition, device and door hardware would be modified, including card readers, door contacts, door prop alarms, motion detectors, sirens, and associated wiring.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto (16 United States Code [U.S.C.] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities (16 U.S.C § 838i(b)(3)).

Findings: In accordance with Section 1021.102 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; 89 FR 34074, April 30, 2024; 90 FR 29676, July 3, 2025, Interim Final Rule) and the current *DOE National Environmental Policy Act (NEPA) Implementing Procedures*, BPA has determined the following:

- 1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
- 2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
- 3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

Jillian Cosgrove
Environmental Protection Specialist

Concur:

Sarah T. Biegel
NEPA Compliance Officer

Attachment(s): Environmental Evaluation

Categorical Exclusion Environmental Evaluation

This evaluation 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: Physical Security System Upgrade at Olympia Substation

Project Site Description

Olympia Substation is located in Thurston County, WA approximately 4 miles southwest of the town of Olympia and 1 mile east of Black Lake. Land use surrounding the substation property consists of low density rural and residential properties. ESA Threatened Oregon spotted frogs are known to occupy wetlands immediately south and southeast of the substation, which is also designated critical habitat for the species. A 0.7-acre scrub-shrub wetland is located on BPA property immediately north of the substation.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: BPA initiated Section 106 consultation on April 3, 2026. Consulting parties included the Nisqually Indian Tribe, the Squaxin Island Tribe, the Confederated Tribes of the Chehalis Reservation, the Quinault Indian Nation, the Cowlitz Indian Tribe, and the Washington State Department of Archaeology and Historic Preservation (DAHP). DAHP concurred with BPA's delineation of the Area of Potential Effects on April 6, 2026. The initial 30-day comment period ended on May 3, 2026; no other comments were received from consulting parties.

Notes:

- If cultural material is inadvertently encountered during the implementation of this project, work would be halted in the vicinity of the finds until they can be inspected and assessed by BPA and in consultation with the appropriate consulting parties. See BPA's Post-Review Discovery Procedure.

2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: The new fence footings would be larger than the current footings and require soil removal. Excavation would occur where soils have been previously disturbed when the substation was originally built. Temporary stockpiles of excavated soil would be stored within the substation yard and would be protected by erosion and sediment control devices. BPA would test soils for contaminants prior to construction and arrange for appropriate disposal.

Notes:

- Best Management Practices (BMPs) would be implemented to limit and contain soil transport by wind and water during construction and during soil storage and disposal.

3. Plants (including Federal/state special-status species and habitats)

Potential for Significance: No

Explanation: All ground disturbance would occur within the existing substation yard.

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

Potential for Significance: No with Conditions

Explanation: There would be no effects to wildlife because all ground disturbance would occur within the existing substation yard. The existing stormwater and spill containment system at the substation, along with the implementation of construction stormwater controls and BMPs, would prevent indirect effects to wildlife and their habitats adjacent to the substation.

Notes:

- All vehicles and equipment would stay on existing paved or gravel roads.
- From February 1 through August 1, no vehicle or equipment access would be allowed in wetlands or flooded roadways.
- Sensitive areas would be flagged and stormwater controls would be installed prior to ground disturbance.
- District Environmental Lead Jonnel Deacon would be contacted at 360-870-1897 prior to entering sensitive areas.

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

Potential for Significance: No

Explanation: There would be no direct effects to water bodies, floodplains, or fish because ground disturbance only would occur within the existing substation yard. The existing stormwater and spill containment system at the substation, along with the implementation of construction stormwater controls and BMPs, would prevent indirect effects to water bodies, floodplains, and fish. Any spills would be addressed immediately and follow BPA protocol for cleanup and regulatory notification. See notes in #4.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: There would be no direct effects to wetlands because all ground disturbance would occur within the existing substation yard. The existing stormwater and spill containment system at the substation, along with the implementation of construction stormwater controls and BMPs, would prevent direct and indirect effects to wetlands. Any spills would be addressed immediately and follow BPA protocol for cleanup and regulatory notification. See notes in #4.

Notes:

- The 0.7-acre scrub-shrub wetland located on BPA property immediately north of the substation yard would be flagged prior to construction.
- Silt fencing, and other stormwater controls as appropriate, would be installed between the flagged wetland area and the construction zone prior to ground disturbance.
- No fill or removal of material would occur within the flagged wetland area.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Historical U.S. Geological Survey data indicate that groundwater is 14-25 feet below the ground surface in this area. Excavation for fence construction and pole installation would not be deep enough to affect groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The project would not result in changes to land use or specially-designated areas.

9. Visual Quality

Potential for Significance: No

Explanation: The new security fence would be slightly taller and more opaque than the existing fence, resulting in minimal changes to visual quality.

10. Air Quality

Potential for Significance: No

Explanation: There would be minor, temporary effects on air quality during construction caused by fuel emissions and dust from construction equipment. There would be no lasting change to air quality.

11. Noise

Potential for Significance: No

Explanation: Construction activities would create elevated noise during daytime hours. There would be no lasting change to baseline noise.

12. Human Health and Safety

Potential for Significance: No

Explanation: Workers would be required to follow all applicable state and Federal safety standards.

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

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: N/A

Landowner Notification, Involvement, or Coordination

Description: This project would occur entirely on BPA fee-owned property. No landowner notification or coordination is required.

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

Signed:

Jillian Cosgrove
Environmental Protection Specialist