Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Technical Services Building Construction at the Ross Complex (*update to CX issued on August 24, 2021*)

Project No.: P03995

Project Manager: George E. Wespi, TEPF-CSB-2

Location: Clark County, Washington

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.15 Support buildings; B1.32 Traffic flow adjustments

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to construct a new Technical Services Building (TSB), improve road patterns, and add additional vehicle parking at its J.D. Ross Substation and Regional Operations and Maintenance Facility (Ross Complex) in Vancouver, Clark County, Washington. The Ross Complex is a 260-acre facility with multiple offices, maintenance buildings, and a large substation. The TSB would allow for the consolidation of System Protection Control (SPC) and Power System Control (PSC) work group functions in a new more efficient, purpose-built space. This CX has been updated to reflect the need for two engine generators to provide emergency electrical service to the TSB.

The new three-story TSB would be approximately 60,000 square feet and would be located in what is currently a partially paved and partially mowed grass field east of the Dittmer Control Center. Road improvements would include adding a new traffic circle east of the main gate on NE North Road and improving/reconstructing an existing southern entrance from NE Ross Street that is currently used solely for emergency purposes. Approximately 200 paved parking spaces would be added west of the existing Ross Substation (between the substation and the existing District Office Building [DOB-1] and the TSB) and south of the new TSB. The proposed parking area currently slopes steeply from Ross Substation to the DOB-1 and the TSB and would require grading and construction of new retaining walls to facilitate the installation of parking. Up to 14 trees could be removed to construct the TSB, improve the roads, and expand the parking areas.

Within the construction boundary, existing underground utilities, utility vaults, and stormwater infrastructure would be removed, replaced, and/or installed new to provide service to the TSB and parking areas. Two engine generators (with provisions for addition of a third generator in the future) would be installed to provide emergency electrical service to the TSB in the event of a power outage. A new sanitary sewer line would tie into an existing sanitary sewer line east of the Emergency Scheduling Center (ESC). The existing line would be camera scoped to determine its condition and could be replaced, if required. Replacing the existing sanitary sewer line could require removing up to eight trees. Stormwater infrastructure would be installed to manage runoff from the TSB and parking areas, including a vegetated infiltration basin east of the TSB and stormwater catch basins and underground piping throughout the construction area. The new stormwater system would tie into existing stormwater piping and would exit into the existing

treatment vaults located south of the TSB and west of the existing ESC. Tying into the existing stormwater treatment vaults would require trenching and installing new pipes west of the ESC building and could require removing up to four trees.

Temporary project oversight and coordination facilities would be established in an existing paved parking lot located approximately 0.20 mile east of the project site on the opposite side of NE Ross Street. The area would consist of up to seven mobile office trailers and a portable bathroom and would be surrounded by temporary security fencing. Power would be provided by installing approximately 800 linear feet of underground electrical service line in a 2-inch PVC conduit and a temporary 75-kilovolt-ampere (kVA) transformer. The electric service line would be installed via an approximately 5-inch-diameter directional bore, which would require excavation of three bore pits, each measuring approximately 8 feet by 8 feet by 4 feet deep, as well as potholing along segments of the bore route to verify existing utility locates.

Construction would require the use of heavy equipment, including excavators, dump trucks, flatbed trucks, concrete trucks, cranes, graders, roller compacters, backhoes, and light-duty work trucks. Materials and equipment staging areas would be located on paved and/or previously disturbed areas. Excavated soils would be used on site as much as possible and excess soils and demolished material from excavation and grading would be appropriately disposed of off-site, according to all applicable local, state, and Federal regulations.

In total, approximately 7 acres would be disturbed for the project, approximately 2.25 acres of which is currently paved. The final site buildout would include approximately 4.5 acres of paved surfacing. Up to 26 native and nonnative ornamental trees, including gingko (*Ginkgo biloba*), black maple (*Acer nigrum*), and amur maple (*Acer ginnala*), could be removed. Existing trees located around the perimeter of work areas would be retained, where feasible, and would be protected from construction-related damage with fencing and/or flagging. BPA would implement a landscape replanting plan with native, pollinator-friendly tree, shrub, and herbaceous species, consistent with the City of Vancouver municipal code.

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/ W. Walker Stinnette
W. Walker Stinnette
Contract Environmental Protection Specialist
Salient CRGT

Reviewed by:

/s/ Carol P. Leiter
Carol P. Leiter
Supervisory Environmental Protection Specialist

Concur:

/s/ Katey C. Grange *September 13, 2021*
Katey C. Grange Date
NEPA Compliance Officer

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: Technical Services Building Construction at the Ross Complex (*update to CX issued on August 24, 2021*)

Project Site Description

The project site is located on BPA fee-owned property within BPA's Ross Complex in Vancouver, Clark County, Washington (Township 2 North, Range 1 East, Sections 14 and 15). The Ross Complex consists of a large substation and maintenance and operations facilities situated on 260 acres, with residential neighborhoods to the north, east, and south and Interstate-5 to the west. Project activities would occur in the southwestern portion of the Ross Complex in an area bound by Ross Substation to the east, NE Ross Road to the south, Dittmer Control Center and DOB-1 to the west, and NE North Road to the north. Temporary project oversight and coordination facilities would be established in an existing paved parking lot south of NE Ross Street. Ground disturbance would occur in areas that were previously disturbed and are currently paved or maintained with low-growing vegetative cover and some native and non-native trees. No wetlands are located within or near the project site. The project site is underlain by Wind River and Hillsboro soils, which are not hydric. The closest streams are Burnt Bridge Creek and one of its tributaries, which are located over 300 feet from the project site.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: On May 6, 2020, BPA initiated National Historic Preservation Act, Section 106 consultation with the following parties:

- The Cowlitz Indian Tribe
- Washington Department of Archaeology and Historic Preservation (DAHP)

Within the project's area of potential effects (APE), the Dittmer Control Center was identified as a contributing resource to the J.D. Ross Substation Historic District and is individually eligible for inclusion in the National Register of Historic Places (NHRP). BPA determined that the proposed undertaking would adversely affect the historic integrity of the Dittmer Control Center as it relates to the relationship of greenspace to the built environment, the viewshed from the Dittmer Control Center east over the rest of the Historic District, and the established scale of structures west of the Ross Substation. A Memorandum of Agreement between the Bonneville Power Administration and the Washington State Historic Preservation Officer Regarding the Construction of a New Technical Services Building on the Ross Complex in Clark County, Washington was signed on August 3, 2020. No other comments were received from The Cowlitz Indian Tribe.

Notes:

- In the unlikely event that cultural material is 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 in consultation with the appropriate consulting parties.

2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: The proposed action would result in approximately 7 acres of ground disturbance in previously-disturbed and/or paved areas. Ground-disturbing activities would include excavating for the TSB foundations, installing underground utilities and stormwater infrastructure, and cutting into an existing slope, grading, and constructing retaining walls to create new parking areas. Excavated and graded soils would be stored temporarily on-site and then used for backfill and/or disposed of off-site, according to all applicable local, state, and Federal regulations. Best management practices (BMPs) would prevent migration of sediment off-site.

Notes:

- Test soils for hazardous materials, which if found, then would be disposed of off-site according to all local, state, and Federal regulations.
- Implement a BPA-approved Erosion and Sediment Control Plan that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Implement a BPA-approved landscape replanting plan as soon as feasible after disturbance.

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

Potential for Significance: No with Conditions

Explanation: The proposed action includes development of partial vegetated space, which would require permanent removal of approximately 2.25 acres of regularly mowed low-growing vegetation and up to 26 native and non-native ornamental trees. No special-status plant species or suitable habitat is present within or near the project site. Therefore, the proposed action would have no effect on special-status plant species or habitats.

Notes:

- Implement a BPA-approved landscape replanting plan as soon as feasible after disturbance.
- Adhere to the Tree, Vegetation, and Soil Plan (TVSP), which is consistent with the City of Vancouver Municipal Code 20.770, Tree, Vegetation, and Soil Conservation.

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

Potential for Significance: No with Conditions

Explanation: Minor and temporary disturbance of wildlife could occur from elevated noise during construction. Because the work would be occurring adjacent to a currently-operating substation and within the overall complex, any wildlife present are used to human presence and noise. No special-status wildlife species or suitable habitat is present within or near the project site. Therefore, the proposed action would have no effect on special-status wildlife species or habitats.

Notes:

- Remove trees between September 1 and December 31 to avoid impacting breeding or nesting migratory birds, if present.

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

Potential for Significance: No with Conditions

Explanation: The proposed action includes installation of stormwater management infrastructure, which would be built in accordance with all applicable local, state, and Federal regulations. No waterbodies or special-status fish species are present within the project site, and the project site is not located within a floodplain. During construction, BMPs would prevent indirect impacts to off-site waterbodies, floodplains, and special-status fish.

Notes:

- Implement a BPA-approved Erosion and Sediment Control Plan that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Implement a BPA-approved Stormwater Pollution Prevention Plan (SWPPP) during construction.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: No wetlands are present within the project site. BMPs would prevent indirect impacts to off-site wetlands. Therefore, the proposed action would not impact wetlands.

Notes:

- Implement a BPA-approved Erosion and Sediment Control Plan that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

7. Groundwater and Aquifers

Potential for Significance: No with Conditions

Explanation: Ground disturbance is unlikely to reach depths to groundwater and no new wells or other uses of groundwater or aquifers are proposed. BMPs would prevent impacts from unintended spills to groundwater and aquifers. Therefore, the proposed action would not impact groundwater or aquifers.

Notes:

- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The project would develop partial vegetated space that is currently characterized by low-growing vegetative cover and some native and non-native trees. However, this change in land use would be consistent with the surrounding land uses within the Ross Complex. Project-related vehicle traffic could intermittently impact traffic flow on NE Ross Road during construction. The new vehicle entrance from NE Ross Road could permanently change traffic flow, but there would not be an overall change in the daily total number of vehicles at Ross Complex. No specially-designated areas would be impacted by the proposed action.

9. Visual Quality

Potential for Significance: No

Explanation: Construction of a new three-story, 60,000-square-foot building would result in a perceptible change in the appearance of the overall Ross Complex relative to the current vegetated area and the scale of existing structures. However, BPA would implement a landscape replanting plan to establish native, pollinator-friendly species, and the TSB would not be visible from properties outside of the Ross Complex.

10. Air Quality

Potential for Significance: No

Explanation: Construction activities would result in a minor and temporary increase in dust and vehicle emissions in the local area. The new engine generators, which constitute a new permanent source of emissions, would only be operated as needed in the event of a power outage and only until primary power service is restored. The engine generators would also be test run periodically throughout the year for approximately an hour to ensure they remain in reliable working condition.

Ross Complex maintains an existing Air Discharge Permit with Southwest Clean Air Agency (SWCAA), the delegated regulatory agency for State of Washington Ecology. The existing Air Discharge Permit would be updated to include the new engine generators, which would be maintained and operated within allowable emission levels.

11. Noise

Potential for Significance: No

Explanation: During construction, use of vehicles and equipment and general construction activities would create noise above current ambient conditions. However, noise impacts would be temporary and intermittent and would only occur during typical working hours (approximately 7 AM to 7 PM). Construction-related noise would not be audible from residential properties surrounding the Ross Complex. There would be no long-term change in ambient noise following completion of the project.

12. Human Health and Safety

Potential for Significance: No

Explanation: Construction would be completed by trained professionals who would follow all applicable safety precautions as detailed in a site-specific Safety Plan, which would be maintained on-site during construction and updated, as needed. The general public would not have access to construction areas while work is ongoing, and work areas would be secured when construction crews are not present. Therefore, the proposed action would not be expected to impact human health and 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: Surficial surveys of the project area have not indicated hazardous substances or contaminants. A qualified industrial hygiene firm has written a Hazardous Materials Management Plan for implementation in the unlikely event that problematic materials are identified during the project. This firm would be available for additional sampling and direction throughout the project to ensure that hazardous substances or pollutants are not released in an uncontrolled manner.

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: The proposed action would occur on BPA fee-owned property. Therefore, no landowner notification, involvement, or coordination would be required.

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

Signed: */s/ W. Walker Stinnette* *September 13, 2021*
W. Walker Stinnette, EC-4 Date
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