

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Vancouver Control Center Project at the Ross Complex (*Update to previous CX issued on February 15, 2024*)

**Project No.:** P03890, P03892, P05413, and P06719

**Project Manager:** Mitchell Bergman – NWMM-PSB-2

**Location:** Clark County, Washington

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.15 Support buildings

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to construct the Vancouver Control Center (VCC) project at the J.D. Ross Substation and Regional Operations and Maintenance Facility (Ross Complex), located in Vancouver, WA. The new VCC building would functionally replace the existing Dittmer Control Center and other business function office spaces, increasing BPA's ability to modernize its control center systems, and consolidate BPA workgroups in a more efficient, purpose-built space. Additionally, BPA also proposes to construct a new Ross Central Stormwater Facility (RCSF) conveyance system and detention pond, and construct a new paved parking lot (Parking Lot F) to support staff working at the Technical Services Building (TSB). New fiber optic cable would be installed and new temporary gravel parking lots (Parking Lots D and E) would be developed to accommodate the temporary construction staff working onsite during the VCC project. This CX has been updated to include the results of a cultural resources Section 106 consultation related to an Area of Potential Effect expansion to accommodate a location shift for the stormwater pond and fiber optic cable and Ellen Davis Trail reroutes to allow space for the stormwater pond's new location and underground conveyance pipe system.

To prepare the Ross Complex for construction of the VCC building, the North Ampere (Z-989), Untanking Tower (Z-990), South Ampere (Z-991), South Ampere Accessory (Z-998), and the Wash Rack (Z-1361) buildings on the Ross Complex would be demolished and removed. The obsolete cooling pond and transfer track rails would be redeveloped into parking lots.

The new VCC building would be three-stories tall and about 360 feet long and about 210 feet wide at the ground level. The VCC would include office spaces and BPA transmission control center functions. In addition to the primary building structure, VCC would have an exterior central utility plant yard. The utility plant yard would be approximately 180 feet long and 90 feet wide. It would contain transformers, and four engine generators (with associated fuel tanks) to provide emergency electrical service. Some mechanical equipment (i.e. chillers) may also be located in the utility plant yard.

A new 200-foot-tall communications tower would be installed on the south side of the VCC building and west of the Central Plant Yard. Communications equipment, including a VHF whip antenna, UHF antenna, up to 6 microwave radio dishes, and associated communications cables, would be installed on the tower.

About 1,000 linear feet of new fiber optic cable and three new communications vaults would be installed. The new fiber would begin at an existing vault near the wash rack (inside the perimeter chain link fence). The fiber would be installed southward under NE Ross Street and would continue south and parallel the east side of NE 15<sup>th</sup> Avenue for about 660 feet. The fiber path would then turn west and be installed under NE 15<sup>th</sup> Avenue, near the ABC parking lots. The fiber path would then proceed south and parallel the west side of 15<sup>th</sup> Avenue for another 220 feet, where it would intersect with another existing vault.

Excavation would be used to install the new vaults, and each vault would be up to 6 feet deep, 4 feet wide and 4 feet long. The fiber would be installed via directional boring or trenching methods. Directional boring entry and exit pits would temporarily disturb an area of about 10 feet wide by 10 feet long. If trenching is used, then the trench would be up to 6 feet deep, and up to 2 feet wide.

About 391 existing vehicle parking spaces around the construction site would be decommissioned; virtually the same number of parking spaces would be created by converting the obsolete cooling pond and wash rack into vehicle parking lots.

Additionally, a new 78-stall overflow paved parking lot (Parking Lot F) with landscaping and security lighting would be constructed to support staff working in the nearby TSB. The lot would be up to 300 feet long and up to 180 feet wide (1.3 acre), and would be constructed southwest of Ross Substation's 230kV switchyard adjacent to the Ross–Rivergate No 1 right-of-way, in an area that is currently maintained as grass lawn.

At the intersection of NE Ross Street and NE 15<sup>th</sup> Avenue, an existing vehicle exit-only gate would be permanently closed to all vehicle traffic, and would be redeveloped and replaced with a medium security mini-mesh fence and a pedestrian access gate. Existing stormwater infrastructure on the Ross Complex would be removed, upgraded, modified, or installed new to manage runoff from the VCC and parking areas and across the Ross complex, including vegetated conveyance basins, and a new stormwater detention and infiltration pond. The new RCSF pond would have variable widths and lengths, but at most would be up to 200 feet wide by up to 300 feet long (about 1.25 acre), and would be constructed in a grass lawn area south of NE Ross Street and northwest of the Paul D. Johnson Substation. An existing gravel road would be reconstructed, and a new landing pad would be installed near the location of the new pond, to facilitate the heavy truck, equipment staging, and stable access route to haul offsite about 20,000 cubic yards of excavated materials to create the new pond.

Underground conveyance piping and catch basins would be installed in underground trenches up to 6 feet deep throughout the Ross complex. The stormwater diversion conveyance pipes would be installed alongside the Ellen Davis Trail and NE Ross Street, then pass under NE Ross Street to the new detention and infiltration pond, and then connect with existing underground city stormwater lines. A portion of the Ellen Davis Trail on BPA fee-owned property may be temporarily closed to public access and/or temporarily rerouted during the pipe installation. Temporary detour walkways would receive gravel or bark chip surfaces for safe navigation around construction work areas.

Removal, replacement, relocation, and/or installation of the following civil infrastructure would be necessary within the Ross Complex to support the new VCC, parking lots, and the RCSF: sidewalks, underground utilities and vaults, station service, fiber optic cable and communications equipment, water and sanitary sewer lines, and physical security updates to perimeter gates, fencing, concrete vehicle barriers, sidewalks, and landscaping. Vehicular traffic immediately surrounding the VCC would be possible, but controlled and reserved for fire apparatus or special deliveries to the Mangan Lab area.

Construction would require the use of heavy equipment, including excavators, bulldozers, 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 soil would be used on site as much as possible, including the relocation of up to 30,000 cubic yards of soil from the Ampere demolition and VCC construction site, to a grass-lawn area located between the ABC Parking Lot and the Paul D. Johnson Substation. The soil would be graded and compacted to create a flat surface area, and would cover about 2.87 acres (125,000 square feet; roughly 200 feet wide by 650 feet long). A fabric barrier and crushed gravel aggregate would be applied to the area to create temporary parking lots (Parking Lot D and E) with up to 250 vehicle stalls to support personnel working on the construction project. Upon VCC construction completion, the temporary gravel parking lots would be revegetated.

Excess soil may be spread around the construction site and revegetated, temporarily stockpiled for future BPA use, or hauled off-site. Demolished material from excavation and grading would be disposed of off-site, according to all applicable local, state, and Federal regulations.

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 1021.410(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; 89 FR 34074, April 30, 2024), 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.<sup>1</sup>

Becky Hill  
Environmental Protection Specialist

Concur:

Katey C. Grange  
NEPA Compliance Officer

Attachment(s): Environmental Checklist

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<sup>1</sup> BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

# 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:** Vancouver Control Center Project at the Ross Complex (*Update to previous CX issued on February 15, 2024*)

## Project Site Description

The project site is located on BPA fee-owned property within BPA's Ross Complex located in Vancouver, Washington. The Ross Complex consists of the Ross Substation, Ross Maintenance Headquarters, and other BPA support facilities. The complex is surrounded by residential neighborhoods on the north, east, and south, while Highway 99 and Interstate-5 are located about 250 feet and 500 feet, respectively, to the west of the complex. The complex is split north-south by a riparian corridor associated with Cold Canyon Creek and Burnt Bridge Creek, which are designated freshwater critical habitat for Lower Columbia River coho salmon. This east-west riparian corridor connects the creeks and their floodplains to freshwater-forested shrub wetlands located along both sides of Highway 99 and Interstate-5. A perimeter chain link fence surrounds the Ross Complex, and railroad tracks and the previously mentioned riparian corridor are located about 450 feet north of the existing North Ampere Building.

## 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 December 21, 2021, with the Cowlitz Indian Tribe and the Washington State Department of Archaeology and Historic Preservation (DAHP). On January 7, 2022, DAHP responded with a disagreement on the Area of Potential Effect (APE). As such, BPA revised the APE, and reinitiated consultation with the consulting parties on January 18, 2022.

On February 25, 2022, BPA determined that implementing the proposed undertaking would result in an adverse effect to historic properties. BPA notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect on April 7, 2022, and worked with DAHP to develop mutually agreeable mitigation measures. A Memorandum of Agreement (MOA) was signed on May 12, 2022, by DAHP and BPA. The MOA defines those mutually agreed upon mitigation measures to be implemented by BPA for the adverse effect to the historic property.

On February 5, 2024, the BPA archaeologist and historian determined that the installation of new fiber optic cable, soil relocation, and the new parking lot would have no potential to cause effect to historic properties and issued a memorandum documenting the determination.

On March 24, 2025, the BPA archaeologist and historian initiated Section 106 consultation with the Cowlitz Indian Tribe and DAHP. This initiation also included Washington State Department of Transportation because the expanded APE intersects with WDOT land, even though no project work is proposed on WDOT land. While BPA continues to find that the overall Ross Vancouver Control Center undertaking will result in an adverse effect to

historic properties (resolved in May 2022 by the execution of an MOA between BPA and DAHP), there are no historic properties within the expanded APE that would be affected by the proposed stormwater and fiber conduit actions described in the proposed action above.

Notes:

- An Inadvertent Discovery Plan, with contact information for the BPA cultural resources lead, would be supplied to the construction contractor prior to commencing construction work. Should cultural resources be discovered during project activities, then all project work in the area must stop, and the cultural resources lead must be notified immediately.

## **2. Geology and Soils**

Potential for Significance: No with Conditions

Explanation: The proposed action associated with construction of VCC would result in about 10 acres of ground disturbance in the previously-disturbed areas: asphalt surfaces used for equipment storage and vehicle parking, the footprint of the concrete cooling pond, and existing buildings to be demolished. Additionally, ground disturbance would also occur on about 4.2 acres of land currently maintained for lawn grass and about 1.0 acre of ground disturbance in an area also currently maintained for lawn grass with some mature conifer trees and shrubs. Ground-disturbing activities would largely occur in previously-disturbed soils and would include demolishing existing structures and their foundations, excavating for a new building foundation, installing underground conduit for utilities and communications cables, and installing a stormwater detention pond and associated infrastructure. Best management practices (BMPs) would be implemented to prevent the migration of sediment off-site.

Notes:

- Test soils for hazardous materials, which if found, would be disposed of off-site according to local, state, and federal regulations.
- Implement a BPA-approved Erosion and Sediment Control Plan (ESCP) that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Implement a BPA-approved revegetation plan as soon as practicable after disturbance.
- Revegetate disturbed areas with a native seed mix appropriate for the region, as soon as practicable after project completion.

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

Potential for Significance: No with Conditions

Explanation: The proposed action includes development of partially vegetated spaces, which would require permanent removal of about 4.2 acres of regularly mowed, low-growing, lawn vegetation and removal of up to 18 mature conifer trees and low growing rhododendron shrubs. No special-status plant species or suitable habitat are 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 revegetation plan as soon as practicable after disturbance.
- Revegetate disturbed areas with a native seed mix appropriate for the region, as soon as practicable after project completion.
- Work with the City of Vancouver to communicate BPA's tree removal needs and landscaping plans, and 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, when feasible.

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

Potential for Significance: No with Conditions

Explanation: The proposed action includes development of partially vegetated spaces, which would require permanent removal of about 4.2 acres of regularly mowed, low-growing lawn habitat, which is of low wildlife habitat value, and removal of up to 18 mature conifer trees and low growing rhododendron shrubs. The permanent removal of 4.2 acres of low-quality lawn habitat would have a minimal effect to any local wildlife, should they be present. The permanent removal of landscape shrubs (i.e. rhododendrons), and up to 18 mature conifer trees would remove potential nesting habitat for birds and habitat for arboreal wildlife species.

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 Ross Complex, any wildlife present are likely used to human presence and noise. Permanent removal of up to 18 mature conifer trees may require arboreal wildlife to relocate to nearby trees. No special-status wildlife species or suitable habitats are present within or near the project site. Therefore, the proposed action would have no effect on special-status wildlife species or habitats, and low impacts to arboreal wildlife species.

Notes:

- Remove trees and shrubs between August 15 and February 15 to avoid impacts to potentially breeding arboreal species or nesting migratory birds, if present.
- Work with the City of Vancouver to communicate BPA's tree removal needs and landscaping plans, and adhere to the TVSP, which is consistent with the City of Vancouver Municipal Code 20.770, Tree, Vegetation, and Soil Conservation, when feasible.

#### **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 new and modification of existing stormwater management infrastructure, which would be built in accordance with all applicable local, state, and Federal regulations. No water bodies 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 water bodies, floodplains, special-status fish, and fish habitat. Therefore, the proposed action would not impact water bodies, floodplains, fish, or fish habitat.

Notes:

- Implement a BPA-approved ESCP 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

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

## 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 or 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 with Conditions

Explanation: The project would develop previously-paved areas and partially vegetated spaces that are currently characterized by low-growing vegetation cover and some native and non-native ornamental trees within a previously-developed site complex. The installation of the underground conveyance pipe near the Ellen Davis Trail would require temporary trail closures and walkway detours.

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 be negligible overall change in the daily total number of vehicles at the Ross Complex. On December 21, 2021, BPA sent the City of Vancouver a Trip Generation and Access Evaluation Memorandum that included a description of the project phasing, vehicle trip generation analysis based on each phase, and a vehicle site access evaluation. The results of the evaluation indicate that potential changes in traffic flow created by the proposed action would not warrant any capacity improvements on the City's transportation system. Senior staff members from the Streets and Transportation Division reviewed the information on February 15, 2022, and responded to BPA with no objections to the analysis and findings presented in the memorandum.

This change in land use of the partially vegetated spaces to Ross Complex transmission-related infrastructure would be consistent with the surrounding land uses within the Ross Complex. Any Ellen Davis Trail closures and detours would be temporary, and would not permanently impact the current land use.

Notes:

- Install temporary signage at both ends of the Ellen Davis Trail to inform the public of the potential temporary access disruption and available detours
- Install temporary gravel or bark chip walkways for Ellen Davis Trail detours during construction.

## 9. Visual Quality

Potential for Significance: No

Explanation: Construction of a new three-story tall VCC building in the place of existing BPA buildings and features 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 VCC 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 four 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 ran periodically for testing 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. Construction-related noise may be audible from residential properties located on the east side of the Ross Complex. However, noise impacts would be temporary and intermittent and would only occur during typical working hours (approximately 7am to 7pm). There would be no long-term change in ambient noise following completion of the project.

## 12. Human Health and Safety

Potential for Significance: No with Conditions

Explanation: Construction would be completed by qualified professionals who would follow all applicable safety requirements as detailed in their BPA-accepted site-specific safety plan, in accordance with BPA Contractor Safety and Health Requirements for Prime and Subcontractors, and any additional state, local, or authority having jurisdiction requirements. The safety plan would be maintained on-site during construction and updated, as needed. Work areas would be secured when construction crews are not present.

Non-construction-related Ross complex staff would not have access to the fenced-off construction areas while work is ongoing unless they first attend a mandatory training, or are escorted by a trained construction worker. Construction work areas in publicly accessible areas (i.e., Ellen Davis Trail) would be temporarily fenced-off to prevent public access and maintain safe distances. Temporary trail closures may be necessary, in which case, temporary detour walkways, located outside of fenced-off work areas would be established.

Demolition of existing buildings may release hazardous and toxic materials (i.e. asbestos and polychlorinated biphenyls [PCBs]) regulated under the Toxic Substances Control Act (TSCA), as implemented by the State of Washington's Department of Ecology. Qualified contractors would handle all TSCA-regulated contaminants and materials would be appropriately disposed of per TSCA regulations.

Therefore, the proposed action would not be expected to impact human health and safety.

Notes:

- Install temporary signage with maps at both ends of the Ellen Davis Trail to inform the public of the potential temporary access disruption and available detour options.
- Install temporary gravel or bark chip walkways for Ellen Davis Trail detours during construction.

### **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: 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. BPA is coordinating with the City of Vancouver during the design phase of the project and will continue to coordinate for the fiber optic cable installation under NE 15<sup>th</sup> Avenue and NE Ross Street.

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

Signed:

Becky Hill  
Environmental Protection Specialist