

PROJECT-SPECIFIC CATEGORICAL EXCLUSION FOR CONSTRUCTION OF MOBILE OFFICES, PACIFIC NORTHWEST NATIONAL LABORATORY, RICHLAND, WASHINGTON

Proposed Action:

The U.S. Department of Energy (DOE) proposes to construct three mobile offices to provide replacement office space and support staff needs at the Pacific Northwest National Laboratory (PNNL) Campus in Sequim, Washington.

Location of Action:

The proposed action will occur at the PNNL Sequim Campus in Sequim, Washington. Two mobile offices will be located on the upland portion of the campus, and one office will be located on the shoreline portion of the campus. Figure 1 shows the proposed locations of the three mobile offices.



Figure 1. Proposed Locations of the MSL-7 Replacement Mobile Offices.

Description of the Proposed Action:

The proposed project plans to install and operate three modular office buildings on the PNNL Sequim Campus in anticipation of the MSL-7 building decommissioning. A single 40ft long x 22ft wide office will be installed located west of the MSL-1 building on the shoreline (Figure 1). This shoreline office will be supported by precast concrete footer pads and tied down to embedded asphalt anchors. This modular building will be connected to power, data, access control equipment and the fire detection system fed from the MSL-1 building. Shallow trenching will be required at the shoreline to connect power, data, and building control systems to the office. Stormwater will discharge through existing drains as the structure is being placed on existing asphalt.

The other two buildings, each 60ft long x 36ft wide, and the associated new asphalt parking area will be installed on the uplands site southwest of MSL-5. Forest clearing activities are required to prepare the area for building installation. The offices will bear onto shallow cast in-place concrete strip foundations, including attachment to a concrete stem wall along the building perimeters. The buildings will be anchored to the concrete foundation using tie downs. Approximately 15 parking spaces will be added in front and directly southeast of the 2 buildings. Trenching is required to connect to power, data, building control systems, sewer and water. The buildings will be connected to potable water, power, access control equipment and the fire detection system fed from the campus storage warehouse located to the north. Data will be connected to the buildings from an existing handhole to the south along the main access road. The buildings will connect to the sewer manhole at the southwest corner of MSL-5, and effluent will be directed to the septic drain field utilizing the existing distribution system. Stormwater would be managed by directing to an existing swale.

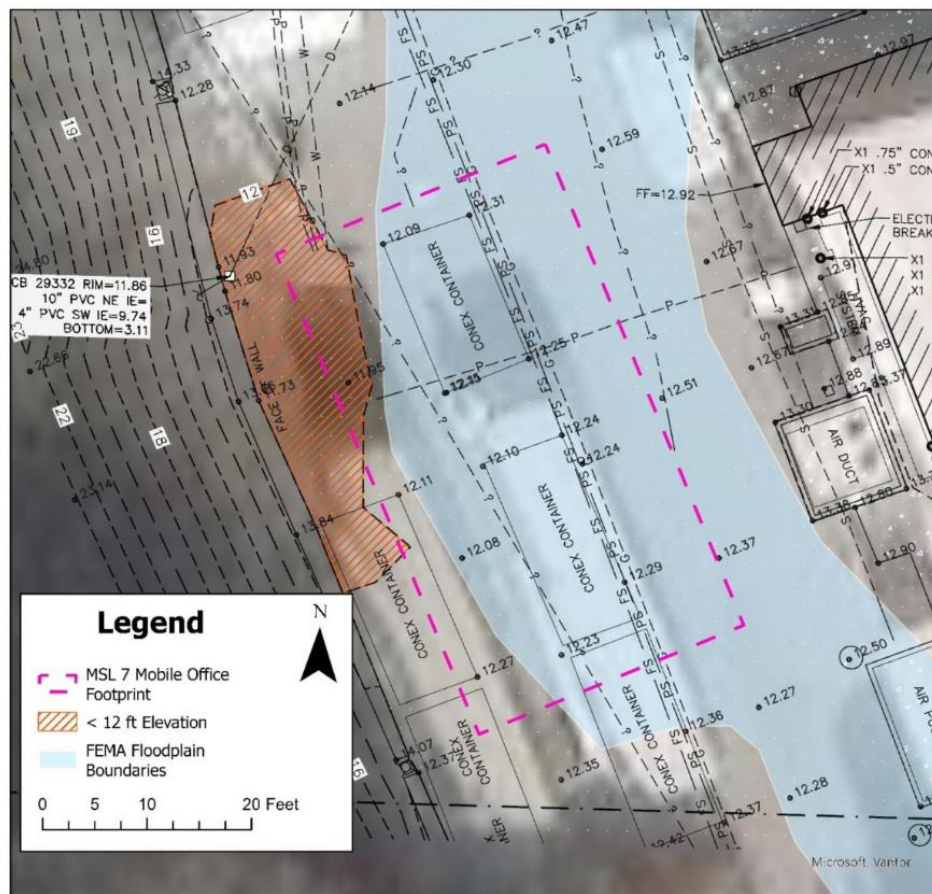
The proposed action also includes reasonably foreseeable actions necessary for implementation such as safety support; material storage, packaging, and transport; equipment and material staging; equipment/instrument installation, modification, calibration, and maintenance; award of grants and contracts; waste management, transport, treatment, storage, and disposal; and obtaining associated regulatory permissions. These activities would be managed in accordance to, and in compliance with, DOE orders, as well as federal, state, and local regulations and guidelines as applicable.

Biological and Cultural Resources:

Biological and cultural resource reviews are conducted for proposed actions with the potential to impact environmental resources. Biological and cultural resource reviews were conducted for the proposed project. The biological resource review found no adverse effects to biological resources from the proposed activities, given the requirements in the biological resource review are followed. The cultural resource review resulted in a finding of Adverse Effect as defined in 36 CFR § 800.5 as the proposed project is a component of the undertaking as defined in *Section 106 Review for the Proposed PNNL Sequim Future Campus Expansion, Clallam County, WA (2019-PNSO-050)*. A Memorandum of Agreement (MOA) has been developed and executed to resolve adverse effects from the undertaking.

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 100-year base floodplain extends over the shoreline area of the PNNL Sequim Campus. This base floodplain identifies areas under the base floodplain elevation, which FEMA defines as 12 feet. FEMA

floodplain maps are developed using regional-scale elevation data, which may not capture localized site conditions. For the PNNL Sequim Campus shoreline, DOE uses the FEMA mapped outer floodplain boundary and FEMA's Base Flood Elevation (BFE) of 12 feet as the authoritative flood threshold, combined with site-specific ground survey elevation mapping to determine actual floodplain boundaries. This method improves upon FEMA's regulatory standard by incorporating more accurate, site-specific data to reflect real conditions on the ground. The proposed MSL-7 mobile office falls within the FEMA-mapped floodplain boundary, but the ground survey confirms that all areas within that boundary are above the 12-foot BFE (Figure 2). As a result, although FEMA mapping shows floodplain overlap, the site does not meet FEMA's definition of a base floodplain based on elevation. Based on the information relative to site conditions, DOE has determined that the proposed project falls outside of the base floodplain. This decision is based upon the most authoritative information available related to the site conditions at the PNNL Sequim Campus shoreline.



As the proposed action is to construct mobile offices, the following CX, as listed in 10 CFR 1021, would apply:

B1.15 *Support Buildings*

Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6, and B6.10 of this appendix.

Eligibility Criteria:

The proposed action meets the eligibility criteria of the DOE NEPA Implementing Procedures. To find a proposal is categorically excluded when applying a categorical exclusion to a proposal, DOE considers the following factors for the full scope of the proposal:

1. The proposal fits within one or more classes of actions listed in appendix B of the DOE NEPA Implementing Procedures;
2. The proposal has not been segmented to meet the definition of a categorical exclusion;
3. There are no extraordinary circumstances related to the proposal that indicate a normally excluded agency action is likely to have a reasonably foreseeable significant adverse effect.

To fit within the categories of actions listed in 10 CFR 1021, the proposal must include the following “Integral Elements”, which are satisfied as discussed below:

INTEGRAL ELEMENTS, 10 CFR 1021, SUBPART B	
<i>Would the Proposed Action</i>	Evaluation
Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health?	The proposed action would not threaten a violation of regulations, DOE orders, or Executive Orders.

Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities?	No waste facilities would be constructed under this CX. Any generated waste would be managed in accordance with applicable regulations in existing facilities. Waste disposal pathways would be identified prior to generating waste and waste generation would be minimized.
Disturb hazardous substances, pollutants, or contaminants that preexist in the environment such that there would be uncontrolled or unpermitted releases?	No preexisting hazardous substances, pollutants, or contaminants would be disturbed in a manner that results in uncontrolled or unpermitted releases.
Have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited, to: <ul style="list-style-type: none"> protected historic/archaeological resources, protected biological resources and habitat, jurisdictional wetlands, 100-year floodplains, Federal- or state-designated parks and wildlife refuges, wilderness areas, wild and scenic rivers, national monuments, marine sanctuaries, national natural landmarks, and scenic areas. 	No environmentally sensitive resources would be adversely affected by the proposed action. Refer to the Biological and Cultural Resources section for details regarding the project potential to impact environmental resources.
Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species?	The proposed action does not involve the use of genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species.

Summary of Environmental Impacts:

The following table summarizes environmental impacts considered when preparing this CX determination.

Environmental Impacts Considered when Preparing this CX Determination	
<i>Would the Proposed Action</i>	Evaluation
Result in more than minimal air impacts?	Air impacts from construction activities would be minimized as necessary and would be compliant with applicable permits, local, state, and federal regulations, DOE orders, and PNNL guidelines.
Increase offsite radiation dose measurably?	The proposed action would not increase offsite radiation dose.

Require a radiological work permit?	The proposed action does not require a radiological work permit.
Discharge any liquids to the environment?	Liquid wastes generated by construction activities would be discharged into existing treatment systems and/or disposed of in accordance with applicable regulations and best management practices.
Require a Spill Prevention, Control, and Countermeasures plan?	The proposed action is not expected to require a formal Spill Prevention, Control, and Countermeasures plan.
Involve hazardous, radioactive, polychlorinated biphenyl, or asbestos waste?	The proposed action is not expected to involve hazardous, radioactive, polychlorinated biphenyl, or asbestos waste streams.
Use carcinogens, hazardous, or toxic chemicals/materials?	Construction activities associated with the proposed action may involve the use of carcinogens, hazardous and/or toxic chemicals and materials. Project inventories would be maintained at the lowest practicable levels, and chemical wastes would be recycled, neutralized, or regenerated if possible. Product substitution (use of less toxic chemicals in place of more toxic chemicals) would be considered when reasonable.
Cause more than a minor or temporary increase in noise level?	Noise level increases associated with the proposed action will be minor and temporary.
Create light/glare, or other aesthetic impacts?	The proposed action is not expected to create light, glare, or other aesthetic impacts.
Require an excavation permit (e.g., for test pits, wells, utility installation)?	The proposed action may require an excavation permit, excavation permits will be acquired as required.
Disturb an undeveloped area?	The proposed action includes tree clearing activities occurring directly adjacent to developed areas. Restrictions provided in the biological review will minimize impacts to biological resources that may utilize that area.
Result in more than minimal impacts on transportation and public services?	The proposed action will not have more than minimal impacts on transportation and will have no impact on public services.

Require environmental or other permits from federal, state, or local agencies?	Federal, state, and/or local environmental permits will be required for the proposed action. All permits will be acquired or updated prior to project activities and activities will abide by all applicable permit requirements.
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Compliance Action:

I have determined that the proposed action satisfies the DOE NEPA eligibility criteria and integral elements, does not pose extraordinary circumstances, and meets the requirements for the CX referenced above. Therefore, using the authority delegated to me, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation.

Signature: _____

Tom McDermott
PNSO NEPA Compliance Officer

cc: ES Norris, PNNL