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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: September 2, 2011

REPLY TO ATTN OF: KEPR-4

SUBJECT: Environmental Clearance Memorandum

TO: Leon Kempner
Project Manager – TEL-TPP-3

Proposed Action: Perform structural upgrades to the Ross Control House to allow the building to withstand a seismic event.

PP&A Project No.: PP&A-2051

Budget Information: Work Order # 00215487

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

- B2.5 Safety and environmental improvements of a facility, including replacement and upgrade of facility components…Improvements may include…addition of structural bracing to meet earthquake standards…

Location:
The proposed project is located at the BPA Ross Control House within the Ross Complex in Vancouver, Washington. The facility is within the NW 1/4 of Section 14, Township 2 North, Range 1 East.

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposed Action:
BPA proposes to retrofit the Ross Control House, located on the J.D. Ross Complex to address existing structural concerns that limit the building's ability to withstand a seismic event. The work involves a series of modifications to the 1939 stuccu-clad concrete shell and hollow clay tile interior walls that will provide increased lateral support to the structural walls. Other improvements will reinforce the existing flat roof to further strengthen the volume, while additionally allowing improved energy effeciencies and an enhanced working environment for BPA personnel. Specifically the work includes the following elements:

Exterior Work:

- The existing roof cladding will be removed and replaced with new work, except as noted entirely below the parapet level.
- New fall protection will be installed at the roof perimeter. This will consisted of small-diameter stainless steel cable (5/16" dia.) with required anchors and vertical standards, projecting approximately 12" above roof grade. Located 8' back from the exterior and of light colors in small dimension, this element should result in little if any visual impact above the parapet.

- As originally designed the glass block relites surrounding the primary entrance were indirectly illuminated via embedded fixtures metal surround, so that the glass block created a sort of "halo" lighting effect. This system is aged and no longer functional. As a part of the rehabilitation new light fixtures will be installed within the original cavities and the system will be rewired to allow renewed operation.

Interior Seismic Work:

- Improved/Augmented mechanical roof truss connections, utilizing metal clips and anchors will have no visual impact to the impact as all will occur above ceiling level. New steel trusses will reinforce the in-filled portion of the roof (the former skylight) to create a unified roof diaphragm. These trusses will be painted and remain visible from the interior.
- Interior walls will be reinforced with stainless steel studs, anchored into the existing plaster-coated concrete and hollow clay tile walls. Furred out wall cavities will be insulated and then clad with 5/8" gypsum board, finished in compatible fashion to the existing. This modification will extend above the ceiling level, where brace framing will provide additional lateral support, with no visual implications to the interior. Overall room dimensions will be reduced by the wall thickness, approximately 6" on each elevation.
- To maintain the existing window character, including the granite sills, perimeter stud walls will be held back 2" from all window openings, creating a stepped recess and maintaining the original window depth and design. New, lowered, sill caps will be of clear-finished wood, matched in color and design to original door trim.

Other Interior Work:

- Pre-existing ceiling tile throughout was removed due to asbestos as part of the planning and investigation stages of this project. The existing plaster ceiling retains dabs of adhesive as used to support those removed tiles. These areas will be cleaned and then overlaid with new gypsum board, finished in a historically appropriate texture (matched to the walls).
- The Plexiglas-type panels currently present in the (original) steel-grid skylight insert in the Control Room will be removed. The grid itself will be retained and restored, with new industrial-type down lighting installed within the truss bays.
- The perimeter recessed lighting (cove lighting) will be rebuilt/retained to continue this historic interior feature.
- The existing wooden hand rail at the vestibule/lobby does not meet current code. This feature will be modified by compatible 12" wooden arm extensions that project between the starting and ending treds as per code. Finish and design will be matched to the original element, which will be maintained.
- Schoolhouse type pendant lighting in the lobby will be replaced with new, energy efficient, units matched in color and design to the originals (i.e. brass fixtures with 16" dia. Milk glass globes, Shaper [Cooper] Series 434 "Schoolhouse," matched in design and size to existing.
- Original duo-tone brown linoleum tiles with perimeter dado line will remain "as-is" throughout the interior.

Findings:
BPA has determined that the proposed action complies with Section 1021.410 and Appendix B of Subpart D of the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, April 24, 1992, as amended at 61 FR 36221-36243, July 9, 1996; 61 FR 64608, Dec. 6, 1996). The proposed action does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal. The proposal is not connected [40 C.F.R 1508.25(a)(1)] to other action with potentially significant impacts, is not related to other proposed actions with cumulatively significant impact [40 C.F.R. 1508(a)(2)], and is not precluded by 40 C.F.R. 1506.1 or 10 C.F.R. 1021.211. Moreover, the proposed action would not (i) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, (ii) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities, (iii) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and Liability Act - excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted release, or (iv) adversely affect environmentally sensitive resources. The proposed project will not affect any listed threatened or endangered species, or critical habitat under the Endangered Species Act, or Essential Fish Habitat under the Magnuson-Stevens Fishery Conservation and Management Act.

On July 13, 2011, BPA initiated consultation with the Washington State Historic Preservation Office (SHPO), the Cowlitz Indian Tribe, the Confederated Tribes of Grand Ronde, the Confederated Tribes and Bands of the Yakama Reservation. An assessment of effects the project would have to historic properties was conducted by Kramer and Company and is summarized in the report *Request for Determination of Eligibility including Ross Control House Seismic Strengthening Project Finding of Effect.* The assessment determined the project would have No Adverse Effect to historic properties. A concurrence letter was received from the Washington SHPO dated August 17, 2011. No written response was received from the tribes.

This proposed action meets the requirements for the Categorical Exclusion referenced above. We therefore determine that the proposed action may be categorically excluded from further NEPA review and documentation.

/s/ Aaron Shurtliff
Aaron Shurtliff
Environmental Engineer

Concur: */s/ Katherine S. Pierce* Date: *September 2, 2011*
Katherine S. Pierce
NEPA Compliance Officer

Attachments
Environmental Checklist for Categorical Exclusions

Environmental Checklist for Categorical Exclusions

Name of Proposed Project: Ross Control House Seismic Upgrades

Work Order #: 215487 **PP&A Project No.:** PP&A 2051

Prepared by: Aaron Shurtliff **Routing:** KEPR-4 **Date:** 8/26/11

This project has been found to not adversely affect the following environmentally sensitive resources, laws, and regulations:

Environmental Resources	No Averse Effect	No Adverse Effect with conditions
1. Cultural Resources	x	
A letter was received from the Washington SHPO dated August 17, 2011, concurring the proposed project would have No Adverse Effect to historic properties. No written response was received from the tribes.		
2. T & E Species, or their habitat(s)	x	
The proposed area is limited to the interior and exterior structure of the Ross Control House inside the developed Ross Complex and will have no effect to listed T&E species.		
3. Floodplains or wetlands	x	
4. Areas of special designation	x	
5. Health & safety	x	
6. Prime agricultural lands	x	
7. Special sources of water	x	
8. Consistency with state and local laws and regulations	x	
9. Pollution control at Federal facilities	x	
10. Other	x	

List supporting documentation attached (if needed):