

memorandum

DATE: September 19, 2012

REPLY TO
ATTN OF: KEC-4

SUBJECT: Environmental Clearance Memorandum

TO: Charles Fleischer
Project Manager – NWM-4

Proposed Action: Ross Maintenance Headquarters Project

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

Location: Clark County, Washington

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposed Action: BPA is proposing to build a new maintenance headquarters facility within BPA's existing Ross Complex in the City of Vancouver in Clark County, Washington. The proposed project would co-locate five maintenance groups currently located in disparate buildings throughout Ross Complex and enhance their operational effectiveness. Upon completion, the new facility would meet existing and future maintenance group needs for vehicle access and storage, materials and equipment handling, and enhance managerial oversight, inter-group communication and coordination, and overall work efficiency.

The proposed facility would include an office building, a vehicle storage building, vehicle parking and circulation areas, and numerous storage areas including sheds. The office building would be 9,600 square feet, and the vehicle storage building would be 24,000 square feet; both buildings would stand 1-1 ½ stories tall with a 3-4 foot deep spread footing supporting a concrete slab-on-grade floor surface. The entire site would be either paved or graveled.

The proposed project would permanently disturb approximately 5 acres for the new facility and temporarily disturb approximately 11.5 acres for construction activities, all within BPA's 264-acre Ross Complex. Disturbance would result from the movement of vehicles and heavy equipment, organics/soil/debris removal, and the addition and compaction of fill materials. The project site would be accessed through an existing entrance from NE 10th Avenue located at the northwest corner of the site.

Resource Review: BPA reviewed potential impacts to vegetation, wetlands and floodplains, water, federally listed species and critical habitat, and cultural resources by the proposed project.

Existing Environment. The project area is located in the northwest portion of BPA's Ross Complex, approximately 800 feet east of the intersection of State Highway 99 and NE Minnehaha Street. The project site is zoned light industrial and serviced by all necessary utilities. High-voltage transmission lines from Ross Substation extend along the northern, eastern, and southern

borders of the project site. The western portion of the project site is used for the dumping of fill materials, and the rest is used primarily for the storage of wood poles and other transmission line maintenance materials and equipment. Soil contamination present from the wood poles and fill material would be removed in accordance with applicable policies and procedures, and there would be no uncontrolled or unpermitted release of contaminated material. Vegetated areas of the proposed project site are previously disturbed with evidence of fill and grading. The area surrounding the Ross Complex is a developed suburban neighborhood with a mix of residential and commercial uses. A rail corridor and a perennial stream, Cold Creek, cross the complex and lie just south of the project site.

Vegetation. The project would remove existing vegetation comprised of an upland herbaceous plant community with dominant non-native grass species and some non-native forb species, and approximately 20 small- and medium-sized cottonwoods at the southwest corner of the site. No sensitive or federally-listed plant species would be affected.

Water, Wetlands, and Floodplains. According to the National Wetland Inventory (NWI) and site visits, there are no areas classified as jurisdictional wetlands or 100-year floodplains located within or near the proposed site. There are no perennial or intermittent streams within the project site. Cold Creek lies south of the project area, flowing generally within 300 feet of the project site. Best management practices (BMPs) would be utilized to prevent erosion and runoff from construction activities from entering Cold Creek.

Federally Listed Wildlife Species and Critical Habitat. The proposed project will have no effect on these species or their critical habitat located in Clark County because suitable habitat does not exist within the project area.

Cultural Resources. On April 20, 2012, BPA initiated Section 106 consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP) and The Cowlitz Indian Tribe. Based on the background research results, BPA determined the proposed project would have no effect on cultural resources or historic properties. The Washington DAHP concurred with BPA's determination in letters dated August 2, 2012, and September 14, 2012.

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, Apr. 24, 1992, as amended at 61 FR 36221-36243, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011). 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 actions with potentially significant impacts, has not been segmented to meet the definition of a categorical exclusion, is not related to other proposed actions with cumulatively significant impacts [40 C.F.R. 1508.25(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 releases, (iv) have the potential to cause significant impacts on environmentally sensitive resources, or (v) 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.

Based on the provisions identified on the attachment, 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/ Zachary R. Gustafson
Environmental Project Manager

Concur:

/s/ Katherine S. Pierce
Katherine S. Pierce or Stacy Mason
NEPA Compliance Officer

Date: September 19, 2012

Attachments:
Environmental Checklist for Categorical Exclusions
Provisions

Provisions

This categorical exclusion will meet the following provisions:

Natural Resources

- Implement erosion and sediment control best management practices (BMPs) that are protective of Cold Creek.
- Remove all trees outside of the breeding season (February 1st through August 31st). If trees are to be removed between February 1st and August 31st, a qualified biologist must complete a nest survey on the entire site immediately prior to removal.

Cultural Resources

In the event any archaeological or historical material is encountered during project activities, the following actions should be taken:

- Stop work in the vicinity and immediately notify the BPA environmental lead, a BPA archaeologist, appropriate BPA project staff, interested Tribes, Washington DAHP, and the appropriate county, state, and federal agencies.
- Implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering.
- Take reasonable steps to ensure the confidentiality of the discovery site, including restricting access.

Hazardous Materials Management

- Collect, remove, and legally dispose of any construction waste, fill material unsuitable for grading and backfilling, and contaminated fill material off-site in accordance with the policies and procedures prescribed by BPA's Pollution Prevention & Abatement group, Ross Hazardous Materials facility permit, and the Department of Ecology.

Environmental Checklist for Categorical Exclusions

Name of Proposed Project: Ross Maintenance Headquarters Project

Work Order #: 305044

This project does not have the potential to cause significant impacts on the following environmentally sensitive resources. See 10 CFR 1021, Subpart D, Appendix B for complete descriptions of the resources. This checklist is to be used as a summary – further discussion may be included in the Categorical Exclusion Memorandum.

<u>Environmental Resources</u>	<u>No Potential for Significance</u>	<u>No Potential, with Conditions (describe)</u>
1. Historic Properties and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. T & E Species, or their habitat(s) Remove all trees outside of the breeding season (February 1 st through August 31 st). If trees are to be removed between February 1 st and August 31 st , a qualified biologist must complete a nest survey on the entire site immediately prior to removal.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Floodplains or wetlands	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Areas of special designation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Health & safety Collect, remove, and legally dispose of any construction waste, fill material unsuitable for grading and backfilling, and contaminated fill material off-site in accordance with the policies and procedures prescribed by BPA's Pollution Prevention & Abatement group, Ross Hazardous Materials facility permit, and the Department of Ecology.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Prime or unique farmlands	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Special sources of water	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Other (describe)	<input type="checkbox"/>	<input type="checkbox"/>

List supporting documentation attached (if needed):

Signed: /s/ Zachary Gustafson

Date: September 19, 2012