

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Ross Complex Fleet Services and Circulation Upgrades

Project No.: P01491

Project Manager: George Wespi, TEP-CSB-2

Location: Vancouver, WA

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

Description of the Proposed Action: BPA proposes to upgrade facilities and improve road patterns at its JD Ross Substation and Regional Operations and Maintenance Facility (Ross Complex) in Vancouver, WA. The Ross Complex is a 250-acre facility with multiple offices, maintenance buildings, and a large substation. The upgrades would include construction of two buildings and a parking lot, removal of seven existing structures, and relocation of roads and trails within and throughout the complex. The upgrades would remove older, outdated, high-maintenance buildings and allow for consolidation of functions in a more efficient space.

One of the new buildings to be constructed would be the Fleet Services Building (FSB). The FSB building would be 36,000 square-foot two-story structure that would house the Heavy Mobile Equipment Maintenance function (which is currently located a 1940's-sized mechanical garage in the Ampere Building), the Fleet Administration, Loan Pool Administration (mobile equipment lending), and small equipment repair. The FSB would be centrally located at the eastern border of the Complex.

The second new building to be constructed would be the Bronto building, a 5,500 square-foot single story storage structure that would house large aerial lift equipment. The Bronto building would be located adjacent to the new parking lot outside the current Ross complex fence in an area known as the "orchard" per its previous purpose. The parking lot would be used for mobile equipment and loan pool parking. The 2.5-acre lot would be graded and graveled and a large retaining wall would be constructed at the northern property boundary.

The seven existing buildings to be demolished range in size from about 700 square feet (Bulk Gas Storage) to about 7,500 square feet (Plant Services Building Annex). In addition, extensive sections of existing below-ground utilities running throughout the complex would be decommissioned and replaced as needed. About 18 acres would be disturbed for project construction. The grading required for the plan would create a large amount of excess soil, some of which would be utilized to create a prominent vegetated knoll feature inside the Ross Complex.

About 40 trees would need to be removed for the parking lot in the orchard, and for circulation improvements that would displace a vegetated strip in the northern section of the project area. The latter holds the Memorial Grove which encircles stone features and an affixed plaque commemorating the Ross Complex's removal from the EPA Superfund list in 1996. There would be about 16 trees removed in the strip, including the Memorial Grove. At the orchard, three large trees would be removed along with 21 others. Trees to be preserved would be protected from construction impacts. These would be mainly on the perimeter of planned development areas. New tree and shrub plantings

would be done to: increase new parking lot shade, add structure and increase evapotranspiration in water treatment features, meet City of Vancouver code for planting along city streets adjacent to development (mainly the orchard area), and screen the loan pool from trail users on the Ellen Davis Trail.

Stormwater treatment facilities would also be constructed as part of the project. Currently, there are no water quality or flow control systems in this part of the Complex. The FSB would be outfitted with trench drain separators and oil-water separators. In the other project areas, BPA would install: vegetated flow control features, vegetated infiltration basins, a water quality manhole, and trapped catch basins. The outfall of the consolidated systems would be Cold Creek, where runoff is currently directed.

Associated with the redevelopment of facilities at the Ross Complex, about 3,800 linear feet of road would be upgraded and 1,320 linear feet of pedestrian trail would be rebuilt or upgraded. The upgrades would seek to integrate ingress and egress to the site, optimize outdoor workflow and maintain a safe work environment by, for example, removing unsafe “pinch points” and ambiguous rights-of-way between through traffic and adjacent logistics work zones. The main elements of the central circulation upgrade include a new intersection to improve vehicle flow between NE North Road and Ross Canyon Road, and a new pedestrian/bike path improving safety by separating those elements from motor-vehicle traffic along Ross Canyon Road. Also included in this circulation upgrade are the demolition of the old sally port, and the filling of a portion of this spur of NE North Road to accommodate traffic between FSB and loan pool parking at the orchard. The portion of the City of Vancouver’s Ellen Davis Trail that skirts the orchard and other BPA property along 54th Street NE would be re-routed during construction, and rebuilt and upgraded by BPA.

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, July 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/ Michael J. O'Connell

Michael J. O'Connell

Environmental Protection Specialist

Concur:

/s/ Stacy L. Mason

Stacy L. Mason

NEPA Compliance Officer

Date: July 5, 2018

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: Ross Complex Fleet Services and Circulation Upgrades

Project Site Description

The JD Ross Complex is a large BPA substation and maintenance operations facility on BPA fee-owned land that is bounded by Vancouver outer-neighborhoods to the north and south, Interstate-5 to the west, and industrial development to the east. Cold Creek is a culverted intermittent stream to the north of the project area, and Burnt Bridge Creek – an anadromous stream and critical habitat for Coho Salmon – runs along the east side of the property.

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. Historic and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> The BPA Historian and BPA archeologist determined that the project would not adversely affect historic resources. Through a Ross Complex-wide inventory and evaluation, the buildings to be demolished were found to not contribute to the JD Ross Complex Historical District. A pedestrian survey and past study informed the conclusion that the development elements of project would not adversely affect the District and its resources. On December 20, 2017, the WA Department of Archaeology and Historic Preservation (DAHP) concurred that the project would not adversely affect historic resources.</p> <p>The Superfund Memorial Grove stones and plaque, though not from the era of significance for the BPA transmission system, are cultural objects that would be preserved in storage until a new display location is determined. BPA would install the fixtures in an as-yet-to-be-determined newly planted grove.</p> <p>Note: If any archaeological resources are uncovered during construction, immediately halt work in the area of discovery and contact the BPA ECT lead and BPA ECC archeologist for further consultation.</p>		
2. Geology and Soils	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><u>Explanation:</u> There would be approximately 35,000 cubic yards of soil cut by the project. What is not used onsite to backfill and grade would be used to construct a large (up to 40 feet above grade) knoll inside the Complex. As such, the knoll would create an open area of vegetation to support site-wide stormwater management and infiltration. With the plan, about 35% of cut soil would need proper off-site disposal (after testing for contaminants). If needed, and if it would still meet City of Vancouver stormwater management code, a smaller feature could be created instead and the total material needing disposal would rise accordingly.</p> <p><u>Mitigations:</u></p> <ul style="list-style-type: none">✓ Adhere to a BPA-approved Erosion and Sediment Control Plan that is guided by Washington Department of Ecology’s Stormwater Management Manual for Western Washington.✓ Re-vegetate disturbed areas with BPA-approved species mixes as soon as feasible after disturbance.		

3. **Plants** (including federal/state special-status species)



Explanation: Maintained areas of low vegetative cover would be removed, and about 40 mature trees of varying stature would be cut down. A natural area currently maintained as open space and a transmission line corridor (collectively, the "orchard") would be converted to graveled parking and circulation space for large equipment of the BPA loan pool. There would be an increase in vegetated, pervious area within the existing industrialized Complex to treat and manage stormwater and re-purpose excavated materials to a large landscape element.

Mitigations:

- ✓ Adhere to the City of Vancouver-approved Tree, Vegetation, and Soil Plan (TVSP) as developed in accordance with Vancouver Municipal Code 20.770, Tree, Vegetation, and Soil Conservation.
- ✓ Revegetate and seed areas as soon as feasible after disturbance with native species appropriate for the landscape.
- ✓ Contact the Vancouver City Engineering Services Greenways Program to complete fulfillment of BPA's mitigation of tree density impacts by the project. Fund the City Greenways to procure and plant and maintain approximately 70 immature trees in the Burnt Bridge Creek Watershed to meet the final requirements of the TVSP.

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



Explanation: The Ross complex does not support any US Fish and Wildlife-managed threatened or endangered. These species and the rationale for determining there would be no effect to them are presented in an Endangered Species Act No-Effect Memo documented by BPA. Other special-status species would also not be impacted by the project due to a lack of habitat. Potential impacts to breeding migratory birds would be avoided by timing tree and shrub clearing after nesting season.

Mitigations:

- ✓ Cut trees and shrubs after general nesting season: no earlier than August 1, 2018

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



Explanation: The project would implement a stormwater treatment and management plan that would meet City of Vancouver industrial development standards. A BPA-approved Stormwater Pollution Prevention Plan (SWPPP) would guide the total of the construction phase of the project. The project erosion control detail plans are incorporated with construction specifications and are based on City of Vancouver guidelines. Construction would proceed with frequent inspection by BPA personnel for adherence to erosion and sedimentation control plans. Release of potential contaminants that are in the soil profile would be prevented through appropriate testing for the toxic substances and their isolation through onsite-containment Best Management Practices (BMPs).

Post-construction, stormwater would be controlled for flow and quality with a system of treatment elements that would make the project area of the Complex compliant with the City of Vancouver stormwater management ordinance. Quality assurance inspection and observation would begin with construction and personnel would monitor operations through the duration. There would also be self-reporting required to notify inspectors of potential spills or other emergency factors.

These controls would ensure no impacts to the Coho Salmon Critical Habitat about 2,300 feet downstream of the planned system outfall.

Mitigations:

- ✓ Install all effective and necessary controls and other elements developed in a BPA-approved Stormwater Pollution Prevention Plan that includes Erosion and Sediment Controls as noted above.
- ✓ Confirm in writing with City of Vancouver Stormwater Program officials that the plan for the project is compliant with municipal stormwater guidelines for new development.

6. **Wetlands**



Explanation: No wetlands would be affected by the project, and there would be robust controls on runoff to prevent impacts to wetland areas downstream.

7. **Groundwater and Aquifers**



Explanation: There would be excavation, but groundwater is not anticipated for the depths planned. Excavation would remain clear of an aquifer. Standard pollution control BMPs would contain spills that could impact groundwater or aquifers if unchecked. Inspectors would monitor BMP applications.

8. **Land Use and Specially Designated Areas**



Explanation: All land in the project site is owned by BPA. The Ellen Davis Trail is a Vancouver public trail that would be impacted by re-routing during construction. The City has been approached and has agreed to the plan for accommodating trail users during and after construction.

9. **Visual Quality**



Explanation: The neighbors adjacent to 54th Street NE across from the orchard could see and hear more Complex-related activity after construction. Also, the conversion of open space to graveled, industrial equipment parking here would be a potential detraction to the experience of trail use. When considered in context, however, the conversion of the orchard – owned in fee by BPA since 1992 – would not constitute a complete change in purposing. A 230kV transmission line (tower and conductors) traverses the site and a functioning utility garage is visible from the trail and road. There would be vegetative screening (trees, shrubs) established at the site perimeter and the road-side of the trail.

Mitigations:

- ✓ Maintain vegetative screening's integrity and vigor to adequately perform as intended.
- ✓ Use the orchard area as a heavy equipment loan pool and garage area as intended; any potential site re-purposing would need to be analyzed by ECT for visual impacts.

10. **Air Quality**



Explanation: There could be construction-related impacts to localized air quality including increases in vehicle exhaust and dust. Working hours would be standard and the neighboring community would not be disturbed during typical leisure hours.

11. **Noise**



Explanation: There would be construction-related noise, but it would occur during typical working hours and should not affect anticipated activities by the neighboring community.

12. **Human Health and Safety**



Explanation: Adherence to BPA safety specifications and applicable Occupational Safety and Health Administration regulations would be conditions of contractors working on the BPA project. Public safety would be ensured by the re-routing of the Ellen Davis Trail, the notice given to neighbors regarding upcoming construction traffic, and separation by fencing of construction activities from neighboring activities.

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, if necessary:

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- 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, if necessary:

- 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, if necessary:

Landowner Notification, Involvement, or Coordination

Description: The adjacent landowner to the orchard was individually notified of the project and is in possession of contact information of BPA personnel. The surrounding neighborhoods received two informational mailers: one in November 2017, and in May 2018 that had summaries of the most recent project descriptions and general information-line phone numbers for concerns. There have been no contacts regarding the project from the mailer recipients.

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

Signed: /s/ Michael J. O'Connell
Michael J. O'Connell/ECT-4

Date: July 5, 2018