

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Clarkston MHQ Lease Project

**Project Manager:** Paul O'Dell, NWF-1

**Location:** Asotin County, Washington and Nez Perce County, Idaho

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

**Description of the Proposed Action:** Bonneville Power Administration proposes to enter into a 10-year build-to-lease agreement with the Port of Clarkston for the construction and occupation of the new Clarkston Maintenance Headquarters (MHQ) in Asotin County, Washington. The lease could be renewed for up to an additional 5 years after the initial 10-year lease period.

The Port of Clarkston would design and construct the new MHQ facility on about 3 acres for BPA's use upon execution of the build-to-lease agreement. The facility constructed would include about 6,250-square-feet of office space, 2,800-square-feet of warehouse space, 3,190-square-feet of high bay vehicle storage, and 2,000-square-feet of covered vehicle storage. The facility may consist of one or multiple buildings meeting the square footage requirements at the site. About 20 paved vehicle parking spots and an 8-foot-high perimeter fence would also be installed.

After the new Clarkston MHQ facility is completed, BPA would vacate and end the lease for the MHQ facility currently occupied in Lewiston, Nez Perce County, ID. BPA has occupied the Lewiston MHQ site since the 1970s. Prior to ending the lease, BPA would remove all BPA equipment and would appropriately dispose of any potential waste materials.

**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/ Katey Grange

Katey Grange

Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel  
NEPA Compliance Officer

Date: August 21, 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:** Clarkston MHQ Lease Project

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## Project Site Description

The Clarkston lease site is located about 550 feet from the Snake River in a currently developed commercial business park owned by the Port of Clarkston. The entire property is cleared of structures and has a mix of pavement and compacted gravel as ground cover. No wetlands, waterbodies, or vegetation is present and the site is outside of the 100-year-floodplain of the Snake River.

A portion of the Clarkston site is currently leased to an electric utility company which is storing wood poles, oil-filled electrical equipment, and utility maintenance vehicles. The remaining portion of the site is vacant. The property is adjacent to a mini-storage facility on the south; a commercial business on the east; a vacant, grassed lot on the north; and 13th Street to the west. A wastewater treatment plant is located about 300 feet northwest of the lease site. The overall surrounding area is generally a commercial land use and vacant grassed land that may be developed in the future.

The Lewiston MHQ site is a paved, fenced site with office space, covered vehicle and equipment storage, and parking areas.

## Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. <b>Historic and Cultural Resources</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><u>Explanation:</u> The BPA archeologist has reviewed the proposed project and has determined that the type of activity proposed does not have the potential to cause effects to historic properties. The proposed project is within an area that has been completely modified, artificially leveled from previous building construction with imported fill identified, and is disturbed by industrial development.</p> <p><u>Condition:</u> In the unlikely event that cultural materials are identified during the project construction, all work in the vicinity must stop, that area secured and the BPA environmental lead and Washington DAHP would be notified.</p>		
2. <b>Geology and Soils</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> Ground disturbance for the Clarkston MHQ facility construction would be required for the installation of building foundations and paving areas. Ground disturbance areas would be stabilized and managed with BMPs in accordance with the Port of Clarkston's stormwater pollution prevention planning and permitting.</p>		
3. <b>Plants</b> (including federal/state special-status species)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> No vegetation, including ESA-listed plant species, is present on the site; therefore, there would be no vegetation disturbance resulting from the project.</p>		

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

Explanation: No wildlife habitat, including that for ESA-listed species, is present on the site; therefore, no wildlife habitat would be disturbed by the project.

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

Explanation: There are no waterbodies or floodplains on the site; therefore, there would be no disturbance to aquatic resources. Implementation of the Port of Clarkston's stormwater pollution prevention planning and permitting would prevent sediment runoff occurring during ground disturbance from reaching the Snake River.

6. **Wetlands**

Explanation: No wetlands are present on the site; therefore, no wetlands would be disturbed by the project.

7. **Groundwater and Aquifers**

Explanation: No new wells or groundwater use is proposed. New building excavations would not be deep enough to intersect groundwater. BPA would ensure that the Clarkston MHQ lease site would be free of contaminants from previous leases prior to occupying the site, which would reduce the likelihood of groundwater contamination during MHQ construction.

At the current Lewiston MHQ site, BPA would ensure that the site is free of contamination prior to relinquishing the site. Therefore, there would not be any onsite contamination from BPA use that could contaminate groundwater resources in the future.

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

Explanation: The Clarkston MHQ site would be located in a currently-used industrial park and would be consistent with the zoning and previous site uses.

9. **Visual Quality**

Explanation: The Clarkston MHQ site would be located in a commercial/industrial area and the visual quality associated with the new facility would be consistent with the current condition.

10. **Air Quality**

Explanation: A small amount of dust and vehicle emissions would temporarily be generated during construction of the facility.

11. **Noise**

Explanation: A temporary increase in noise would occur during construction. There are no nearby noise-sensitive receptors.

12. **Human Health and Safety**

Explanation: The Port of Clarkston would adhere to OSHA and worker safety requirements during Clarkston MHQ facility construction.

At the current Lewiston MHQ site, BPA would remove and properly dispose of any potential hazardous materials (PCB equipment, sump pit debris, etc.) prior to vacating the property.

### **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: No recognized environmental conditions or concerns were identified during the Environmental Site Assessment, which included a site visit, for the Clarkston MHQ site. An additional site visit would be completed after the current lease holder vacates to confirm that no hazardous substances are present.

At the Lewiston MHQ site, BPA would clean the sump pits of sediment and dispose of materials at an approved waste disposal facility. One piece of equipment containing PCBs is currently housed at the Lewiston MHQ site. Before the end of the lease, the PCB-containing piece of equipment would be shipped to the BPA hazardous facility at the Ross Complex in Vancouver, Washington.

- 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:

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### **Landowner Notification, Involvement, or Coordination**

Description: BPA would be entering into a lease with the Port of Clarkston, the underlying landowner.

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

Signed: /s/ Katey Grange  
Katey Grange

Date: August 21, 2018