

# RECLAMATION

*Managing Water in the West*

## Final Environmental Assessment and Finding of No Significant Impact

**Montrose Equipment Storage Building,  
Aspinall Unit, Montrose County, Colorado**



U.S. Department of the Interior  
Bureau of Reclamation  
Upper Colorado Region, Power Office, Salt Lake City, UT

June 28, 2016

## **Mission Statements**

### **Protecting America's Great Outdoors and Powering our Future**

The Department of the Interior protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interests of the American public.

# **Environmental Assessment and Finding of No Significant Impact**

Proposed agency action: Montrose Equipment Storage Building

Location: Montrose, Colorado

Lead agency: Bureau of Reclamation, Power Office

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Distribution date: June 28, 2016

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# Introduction and Need for Action

The Power Office of the Bureau of Reclamation's Upper Colorado Region proposes to erect a prefabricated storage building in Montrose County, Colorado. Reclamation has prepared this environmental assessment (EA) to disclose and analyze the environmental consequences of this proposal in compliance with the National Environmental Policy Act (NEPA). A finding of no significant impact is attached.

## Background and Project Location

Reclamation's Aspinall Unit is located in western Colorado, Montrose County (Figure 1). Most of Reclamation's staff who work on the Aspinall Unit live in Montrose and commute to the discontiguous project facilities to perform daily tasks. Heavy equipment such as trucks and backhoes are shared across the facilities and are moved from site to site within the Aspinall Unit, as needed. In 2011, Reclamation proposed to consolidate equipment storage at one centralized location and a prefabricated 7,500 square foot steel building was purchased.

However in 2012, before the building could be installed, the Office of Management and Budget (OMB) issued Memorandum 12, *Promoting Efficient Spending to Support Agency Operations*, commonly known as “Freeze the Footprint policy.” In 2013, the OMB issued procedures to implement the Freeze the Footprint policy (OMB Procedures Memorandum No 2013-02). These policies and procedures prohibit Executive Branch departments and agencies such as Reclamation from increasing their total square footage of office and warehouse inventory compared to a fiscal year (FY) 2012 baseline, unless certain exceptions apply. In 2013, the Department of the Interior issued a policy implementing the Freeze the Footprint policy and requiring that each bureau prepare a real property strategic plan and demonstrate that it is maximizing and increasing efficiency in use of space. Therefore, despite having purchased the new storage building, Reclamation could not erect it until it could comply with the Freeze the Footprint policy and OMB and Interior procedures. This EA and related planning documents have been prepared to document that compliance and conformance to the policy.



Figure 1. Vicinity map, showing the Aspinall Unit and Proposed Action locations

## Purpose and Need for Action

The need is to better manage storage and maintenance of vehicles and heavy equipment that are needed for the operation and maintenance of the Aspinall Unit. The purposes by which the alternatives will be evaluated are cost-effectiveness for construction and operation of the storage building (dollars per square foot); sustainability or environmental issues related to construction and operation of the building; the ease of obtaining the necessary permits, agreements or permissions to erect and maintain the new storage building; and conformance with various policies and requirements.

## Alternatives

Since 2011, Reclamation has considered multiple ways of meeting its need for additional storage space and has identified two alternatives: the No Action Alternative and the Proposed Action or Proposal. Additional alternatives were considered but rejected for reasons cited below.

## Proposed Action

Since 2011, the Aspinall Unit's need for consolidated storage space has been reaffirmed and Reclamation is proposing to erect the previously-purchased prefabricated steel building on a lot owned and managed by Western Area Power Administration in Montrose, Colorado. This proposal is considered "co-location and consolidation" which complies with the Freeze the Footprint policies of OMB

and the Department of the Interior. (These policies direct agencies to work together collaboratively to find opportunities for smarter space usage, including co-location opportunities within the existing Federal real estate inventory.)

Figures 2 and 3 provide an aerial view of where the building is proposed to be co-located. Figure 4 is a photograph showing the existing parking lot where the building would be erected. The space is owned and managed by Western Area Power Administration (Western). The location would be about 650 feet west of Western's existing office building in Montrose, in their existing lot. The entire property is fenced and monitored by Western.

The proposal is to erect a 60 by 125 square foot, prefabricated, pre-engineered building on a concrete slab on Western's lot at 1800 South Rio Grande Avenue, Montrose, CO, 81401. This is locally called the "Montrose Complex."

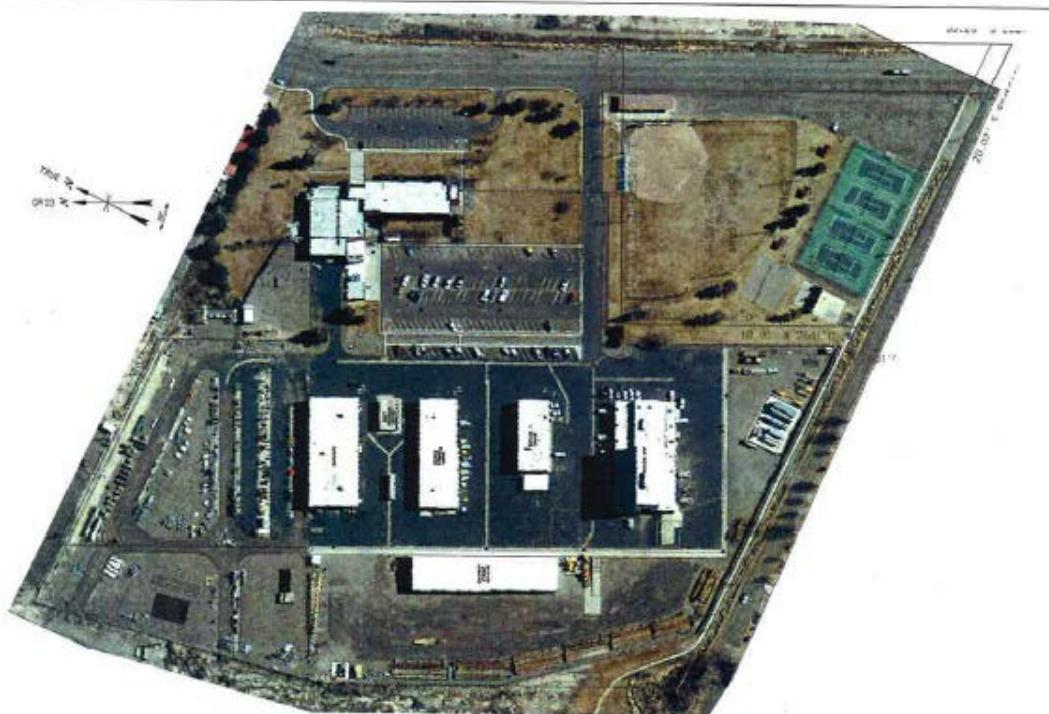


Figure 2. Aerial location of proposed building location. Proposed building footprint is black rectangle in bottom left corner of image. Source: Google Earth.

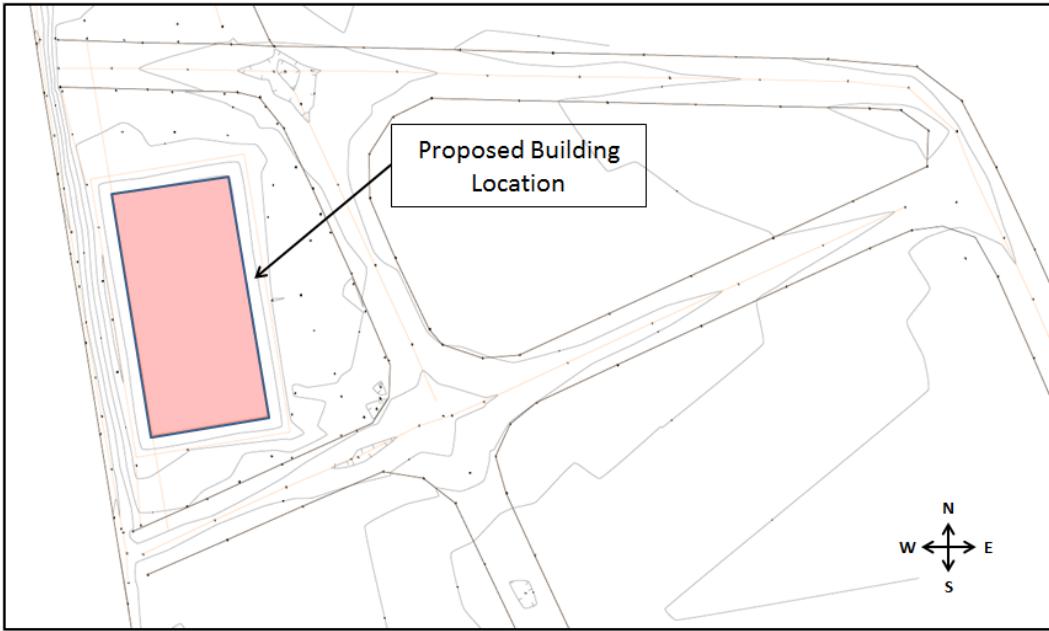


Figure 3. Close up of proposed building footprint on Montrose Complex.

### **Permits and Approvals Needed**

To implement the Proposed Action, several permits or permissions would be required. Reclamation already has an interagency agreement (9-AA-40-08350) with Western to cost-share the space at the Montrose Complex. A letter has been exchanged allowing Reclamation to erect the building on Western's property.

To erect the building and comply with the Freeze the Footprint policy, the Power Office has submitted a Business Case to Reclamation's Denver Office of Policy. Approval from the Office of Policy would be required to construct the building.

The City of Montrose has indicated that no permits or permissions are required.

### **No Action Alternative**

Under the No Action Alternative, the need for indoor equipment storage space would not be met. Equipment would continue to be stored outside; the previously purchased building would remain in storage boxes and deteriorating. The costs of storing the building would continue at \$200 per month or it would be placed on an excess property inventory and sold at an anticipated loss of more than \$145,000.

### **Alternatives Considered but Rejected**

Reclamation considered several different alternatives in making its business case proposal to the Denver Office of Policy. The first alternative considered, but

rejected, was to acquire additional space that would meet the need for action through leases. A search was made for space that could be leased, either through a lease managed by the General Services Administration or a direct lease by the Power Office. There are no other Federal leased spaces available in Montrose, which eliminated the efficiency of a GSA lease, so this alternative would be cost-prohibitive and was not carried through EA analysis.

The Power Office considered a direct lease or purchase of new space for the building, but this would add to the overall square footage owned and/or managed by the Power Office, and that would violate the “Freeze the Footprint” policy articulated in the Office of Management and Budget’s Memorandum 12-12, and 2013-02, as well as Reclamation’s Real Property Strategic Plan of FY2013-2015 of not acquiring new space. Thus this alternative was considered a policy violation and was not carried through EA analysis.

The Power Office also considered a stick-built building on the space at Western’s facility. However, purchase of a pre-engineered, prefabricated building was deemed more environmentally friendly because it reduces the amount of construction waste.

## **Affected Environment and Environmental Impacts**

Reclamation formed an interdisciplinary team to identify any physical, biological, social, cultural or economic issues that might be affected by the alternatives. The analysis of these resources compares effects of the Proposal to the No Action Alternative. The presentation is alphabetical by resource or issue.

### **Air Quality and Construction Impacts**

Under the Proposal, it is anticipated that construction would take one to two months. This means that short-term degradation of air quality would occur due to the release of particulate emissions (airborne dust, PM<sub>10</sub>, PM<sub>2.5</sub>) generated by excavation, grading, hauling, and other construction-related activities. Use of heavy-duty trucks and construction equipment powered by gasoline and diesel engines would generate carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOCs), and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

Ozone is a regional pollutant derived from NOx and VOCs in the presence of sunlight and heat. Colorado is not currently meeting the U.S. Environmental Protection Agency’s National Ambient Air Quality Standards for ozone, but Montrose County has not been designated as a nonattainment area for this or other

criteria pollutants. Therefore, a quantitative air quality analysis is not required for projects in Montrose County.

### **Avoidance, Minimization, or Mitigation Measures**

The construction impacts to air quality would be short-term and would not result in long-term adverse conditions. Implementation of the following measures, some of which may also be required for other purposes such as storm water pollution control, would reduce any air quality impacts resulting from construction activities.

- Water or dust palliative would be applied to the site and equipment as often as necessary to control fugitive dust emissions.
- Construction equipment would be properly tuned and maintained.
- A dust control plan would be developed and implemented, documenting sprinkling, temporary paving, speed limits, and possible re-vegetation of disturbed areas as needed to minimize construction impacts to the community.
- Equipment and material storage sites would be located as far away from any residence or park uses as practicable.
- Construction areas would be kept clean and orderly.
- Any transportation loads of soils and wet materials would be covered before transport, or adequate freeboard would be provided to minimize emissions of dust (particulate matter).
- To the extent feasible, construction traffic would be scheduled and routed to reduce congestion and related air quality impacts caused by idling vehicles along local roads during peak travel times.

### **Biotic Resources, Including Special Status Species**

The existing lot proposed for erecting the storage building is gravel, with turf grass in front of Western's Montrose Office building. (See Figure 4.) There would be no disruption of any native plant communities or displacement of wildlife.

There are no Special Status Species in the vicinity of Western's Office building in Montrose.

### **Energy Supplies, Natural Resources and Sustainable Design**

The prefabricated building in the proposed action measures 7,500 gross square feet in plan view. Any building or building over 5,000 gross square feet is required to conform to the *Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings* and Executive Order 13693, *Planning for Federal Sustainability in the Next Decade*. The proposed building will not have a heating or cooling system (or utilities) attached, and therefore it qualifies for

exemptions from these requirements. (The installed operational heating system capacity would be less than 3.4 BTU/hr/gsf and the installed operational cooling system would be less than 5 BTU/hr/gsf, and the sum of the power rating of all operational energy consuming equipment (other than heating and cooling equipment) would be less than 3.4 BTU/hr/sf (1 W/sf).) In sum, the building is not required to meet government-wide sustainable design or energy standards; however, the Curecanti Field Division will review and consider the Guiding Principles for new construction to conserve energy and natural resources, as practicable.

## **Historic Properties**

As shown in Figure 5, Western's office building is a mid-century modern office building. It was built in the 1960s and could be considered an historic property eligible to the National Register of Historic Places; however, given the distance from the office building and the proposed new building, and given the presence of other prefabricated steel buildings in the parking lot, Reclamation determined this is not an undertaking and there is no need to initiate the 36 CFR 800 process. Nonetheless, through this EA, Reclamation is providing the public with information and opportunity to comment.

## **Land Use and Real Property Acquisition**

Sixty-eight percent of the land in Montrose County is owned by the federal government (US Geological Survey 2012), but the proposal to co-locate the storage building on Western's lot would result in no change in land ownership. Implementation of the proposal would result in no land use ramifications, such as disruption of communities, relocation of residences or businesses, or impacts on natural resource areas. The location for the proposed building is shown in Figure 4. Reclamation would have use of the land under the current interagency agreement with Western for shared responsibilities.

## **Light Emissions and Visual Effects**

The project area is an industrial area and there are no nearby residences or visual receptors. The exterior of the proposed building would not be lit, so there would be no potential for lighting impacts. There would be no loss of night sky resources.



Figure 4 Proposed building location within Western's lot



Figure 5 Western's office building.

## **Noise**

A noise impact would occur if the predicted future noise level with a project area substantially exceeds existing noise levels (with a significant impact defined as a 12 decibel or more increase). Current noise levels at the Montrose project area have not been measured, but with the area classified as a commercial zone, the noise levels are presumed to range from about 67 – 72 decibel. The Proposal, when compared to the No Action Alternative, could cause a short-term, temporary noise increase given that a diesel truck driving at 50 mph measures about 80 decibel. However, this should be below the 12 decibel change that defines a significant change.

## **Social Impacts, Including Environmental Justice**

Montrose County has a population of about 40,000 people (Commerce 2015). In the 2009-2014 period, the racial makeup of the population is 92 percent white. People who self-identify as “Hispanic” or “Latino” comprise about 8,200 persons or 20 percent of the county (Commerce 2015). In the 2010-2014 period, Montrose County has about 12 percent of the families living below the poverty level defined by the OMB Directive 14. This means the county does not have a minority or low-income population for purposes of environmental justice. Therefore, this project is not subject to the provisions of Executive Order 12898.

In comparing the effects of the proposal against the No Action Alternative, there would be slight inconveniences to the residents of Montrose during construction because the heavy equipment used to erect the building would create a slight inconvenience to local traffic. The Proposal would not result in any adverse effects to human health, social or economic issue.

## **Solid and Hazardous Wastes**

One of the reasons Reclamation purchased a prefabricated, pre-engineered building in 2011 was to help reduce the amount of construction waste and solid waste, in contrast with a stick-built building. The proposed erection of the building would not generate significant amounts of solid waste. The local county disposal facilities would be capable of handling the minor additional volumes of waste resulting from the project.

## **Water Resources, Water Quality**

There are no proposed hookups to Montrose City's municipal water supply system, so there would be no impacts to public water resources from the proposal.

There will be no discharges of dredge or fill material into waters of the United States, including wetlands. Therefore, a permit is not required under Section 404 of the Clean Water Act.

In evaluating the potential for storm water runoff, given the size of the proposed building, disturbance area of less than one acre, and the fact that no surface or ground water will be directly discharged into waters of the United States, there is no need for a permit pursuant to the National Pollution Discharge Elimination System (NPDES).

## **Agencies and Persons Consulted**

The public was not specifically notified of the preparation of this EA due to an anticipated lack of interest in the proposal. However, Reclamation is providing for public notification as specified at 43 CFR 46.305 by posting this EA on the internet and providing the public with an opportunity to comment on the proposed finding of no significant impact.

Table 2 lists the federal, state or local government agencies, Indian tribes, and individuals that were contacted or consulted during the development of this EA. Table 3 lists all preparers and the sections of the document they prepared.

**Table 1** List of agencies and persons consulted

Name	Authority for Consultation	Findings and Conclusions
Western Area Power Administration	Department of Energy Act of 1978; Interagency agreement 9-AA-40-08350	Reclamation and Western may co-locate facilities with Montrose complex for mutual benefit
City of Montrose	Hookups, storm water, and city permits	City confirmed that no permit is required, March 2016

**Table 2** List of preparers

Name	Title	Responsible for the Following Sections
Dale Carpenter	Facilities operations specialist	All sections, including impact analysis
Rick Clayton	General engineer	Technical coordination, quality control
Nancy Coulam	Environmental protection specialist	All sections, including impact analysis
Lesley McWhirter	Resource management specialist	Water Resources, Water Quality
Wendy Monroe	Property management specialist	Energy Supplies, Natural Resources, and Sustainable Design
Kay Schritter	Administrative officer	Technical coordination, quality control
Patricia Tease	Program analyst	Alternatives, technical coordination, quality control

# Finding of No Significant Impact

Based on the review of potential environmental impacts in the EA for the Montrose storage building, and considering the significance criteria in 40 CFR 1508.27, I have determined that the proposal will not significantly affect the quality of the human environment and an environmental impact statement is not needed. The rationale for this finding is that none of the environmental effects disclosed in the EA and summarized here meet the definition of significance in context or intensity as defined at 40 CFR 1508.27.

## Context

The affected locality is within western Colorado and the town of Montrose. The proposal is a site-specific action involving less than one acre of land administered by Western Area Power Administration. The land and Western's Montrose Complex does not have national, regional, or state-wide importance. Interested parties include Reclamation, Western Area Power Administration and the City of Montrose.

## Intensity

The Council on Environmental Quality's 10 intensity factors identified at 40 CFR 1508.27(b) have been considered in evaluating this proposal.

- **Impacts that may be both beneficial and adverse.** The beneficial effects of the Montrose Storage Building proposal include the consolidation of equipment indoors; the reduction of emissions from moving the vehicles from one job site to another; and the use of previously purchased prefabricated building. Adverse effects include minor, short-term (one to two months) impacts to air quality while the project is being constructed. Long-term effects would be limited in scope. Whether beneficial or adverse, none of the predicted environmental effects are considered significant.
- **The degree to which the proposed action affects public health or safety.** The Proposal would have no significant impacts on public health or safety and no minority or low income communities would be disproportionately affected. The only impact on human health and safety would be minor emissions during construction. However, these would be short-term and no air quality standard would be exceeded.
- **Unique characteristics of the geographic area.** As discussed in the EA, there are no unique characteristics associated with the project area; i.e., there are no park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. While the project is near a “park,” it is an industrial park—not a recreational area.

- **The degree to which the effects on the quality of the human environment are likely to be highly controversial.** Reclamation contacted representatives of Western Area Power Administration and the City of Montrose regarding the proposal and its effects on resources. No comments were received indicating any effects would be controversial. Also, the draft finding of no significant impact was provided to the public for comment on May 13, 2016 and as of June 28, 2016, no comments or concerns had been raised.
- **The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.** No highly uncertain or unknown risks to the human environment were identified during analysis.
- **The degree to which the action may establish precedent for future actions with significant effects or represents a decision in principle about a future consideration.** The proposal neither establishes a precedent for future Reclamation actions with significant effects nor represents a decision in principle about a future consideration.
- **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.** When the effects of the action are added to other past, present, or reasonably foreseeable future actions, no significant cumulative effects are predicted. No individually or cumulatively significant impacts were identified for the proposal. Any adverse impacts identified for the proposal, in conjunction with any adverse impacts of other past, present, or reasonably foreseeable future actions will result in negligible to moderate impacts to resources.
- **The degree to which the action may adversely affect districts, sites, highways, buildings, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.** Reclamation conferred with Western Area Power Administration's Rocky Mountain Region archeologist regarding eligibility of the Montrose Complex office building and whether the proposal should be considered an undertaking. Given the distance from the existing office building, the presence of other prefabricated steel buildings in the back parking lot, and the fact that the new building would not be in the viewshed of the office building, Reclamation has determined that the proposed erection of the new building is not an undertaking and the 36 CFR 800 process is not required. However, the public is being notified of the proposal via this EA and they have the opportunity to comment prior to signing the Finding of No Significant Impact.
- **The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.** No species listed under the Endangered Species Act nor critical habitat are present in the action area in Montrose.
- **Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.** The proposal does not violate any federal, state, or local law. In addition, this project is consistent with applicable land management plans, policies, and programs.

**Approved:**

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Responsible Official

Date

## References Cited

U.S. Department of Commerce. Census Bureau. 2015. *American Community Survey*. Washington D.C.

U.S. Geological Survey. 2012. *Gap Analysis Program, Protected Areas Database of the United States*. Version 1.3