

PMC-EF2a

(2.04.02)

**U.S. DEPARTMENT OF ENERGY  
EERE PROJECT MANAGEMENT CENTER  
NEPA DETERMINATION**



RECIPIENT: NREL

STATE: CO

PROJECT TITLE : STM Pigeon Reduction Project; NREL Tracking No. 12-006

Funding Opportunity Announcement Number	Procurement Instrument Number	NEPA Control Number	CID Number
		NREL-12-006	GO10337

Based on my review of the information concerning the proposed action, as NEPA Compliance Officer (authorized under DOE Order 451.1A), I have made the following determination:

**CX, EA, EIS APPENDIX AND NUMBER:**

Description:

**B1.3**

Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (e.g., pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed. Custodial services are activities to preserve facility appearance, working conditions, and sanitation, such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal. Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Routine maintenance may result in replacement to the extent that replacement is in kind and is not a substantial upgrade or improvement. In kind replacement includes installation of new components to replace outmoded components if the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to: (a) Repair of facility equipment, such as lathes, mills, pumps, and presses; (b) Door and window repair or replacement; (c) Wall, ceiling, or floor repair; (d) Reroofing; (e) Plumbing, electrical utility, and telephone service repair; (f) Routine replacement of high-efficiency particulate air filters; (g) Inspection and/or treatment of currently installed utility poles; (h) Repair of road embankments (i) Repair or replacement of fire protection sprinkler systems; (j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing; (k) Erosion control and soil stabilization measures (such as reseeding and revegetation); (l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 5820.2, "Radioactive Waste Management"; (m) Repair and maintenance of transmission facilities, including replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed transmission lines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions); (n) Routine testing and calibration of facility components, subsystems, or portable equipment (including but not limited to, control valves, in core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes); and (o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), including removal of contaminated intact equipment and other materials (other than spent nuclear fuel or special nuclear material in nuclear reactors).

**DOE/EA-1440**

Final Site-Site Wide Environmental Assessment of the National Renewable Energy Laboratory's (NREL) South Table Mountain Complex (February 2003)

## Rational for determination:

**BACKGROUND**

This proposed project would be for pest management efforts at the National Renewable Energy Laboratory's (NREL) South Table Mountain (STM) campus in the City of Golden, County of Jefferson, and State of Colorado. Specifically, NREL Site Operations and the EHS Office proposes to undertake an integrated approach to reduce the pigeon population on the STM. Two buildings on the STM would be the focus of removal efforts, the Integrated Biorefinery Research Facility (IBRF) and the Solar Energy Research Facility (SERF). This approach would include trapping and removal, falconry, building modifications, and cleanup. The overall goal of the project would be to greatly reduce the pigeon population at the STM especially the IBRF, but also including the SERF and possibly other buildings including the Field Test Laboratory Building (FTLB). No pesticides would be used to achieve this goal.

Reasons for this effort are concerns for worker health and quality assurance for research efforts. Specifically, biofuel research is conducted in the IBRF and dust from pigeon droppings and feathers get through the vents into the mixing room on the north side of the IBRF (See attached photo). Diseases can result from pigeon droppings. Histoplasmosis is the disease most commonly associated with pigeon droppings. Two other diseases, cryptococcosis and psittacosis, can be borne by pigeon droppings, but statistically present a lower risk. The exposure route for these is the respiratory system, and affects primarily the lungs. Common symptoms include fever, fatigue, chest pains and sometimes

pneumonia. Immuno-compromised persons are at greatest risk of exposure developing into disease and/or life-threatening illness.

#### PROPOSED ACTION

This project would be implemented in phases. The first phase would include trapping and removal concurrently with falconry. The trapping and removal would be conducted by a licensed pest control contractor currently under subcontract with NREL.

NREL proposes to have a master falconer use his falcon to harass pigeons on STM, specifically around the IBRF. Falconry is a form of hunting regulated by the Colorado Department of Parks and Wildlife and by the U.S. Fish and Wildlife Service. Colorado regulations have statutes for hunting, abatement, and depredation. EHS Office representatives will oversee the falconry efforts.

The second phase would include building modifications including:

- Additional netting over building alcoves and equipment;
- Building design modifications – filling voids, rebuilding soffits and overhangs, incorporating materials the deter pecking and perching including natural construction-based repellent.

The third phase would include cleanup by a licensed waste handler currently under contract with NREL. EHS Office would oversee this cleanup operation and ensure compliance with all NREL procedures and applicable federal, state, and local regulations.

#### PRIOR NEPA DETERMINATIONS

Past pigeon management actions at the IBRF (formerly known as the AFUF) were analyzed in NREL-09-034, which was signed on 9/16/2009 and is available in the PMC database. Additionally, pest management and control activities were part of the scope of the proposed action of the July 2003 Site-Wide Environmental Assessment (SEWA) of the National Renewable Energy Laboratory's (NREL) South Table Mountain Complex (STM) (DOE/EA-1440) which resulted in a Finding of No Significant Impact (FONSI) determination issued July 2003. Therefore, DOE/EA-1440 and NREL-090-034 are hereby incorporated by reference into this NEPA determination.

#### IMPACTS OF PROPOSED ACTION

Feral pigeons are nonnative species and are not protected under state or federal law. NREL would implement measures to ensure that falconry does not affect nontargeted species, such as those protected by the Migratory Bird Treaty Act (MBTA), such as having EHS oversight of the falconry activities and utilizing an older bird to minimize the likelihood of a take of a protected species. The falconer holds proper permits with the State of Colorado (#CO587A10-12) and the US Fish & Wildlife Service (PRT# MBO20619). Falconry activities would comply with applicable federal, state, and local regulations and permit requirements. There are no endangered or threatened species or critical habitat present at the NREL STM or its vicinity. No dredge or fill of Waters of the U.S. (WOUS) including wetlands or seeps would occur. Additionally, the U.S. Army Corps of Engineers identified no jurisdictional wetlands and no WOUS at the STM site in a recent Jurisdictional Determination. The proposed project area is also not within the 100-year floodplain per FEMA FIRM Map Panel FM08059C0281E and is not designated as prime farmlands. This proposed action would not result in the generation of air emissions or hazardous waste. All removal of waste or wastewater generated by the third phase of the proposed action would be conducted in accordance with applicable federal, state, and local environmental regulations. This proposed action would not utilize a controlled pesticide managed under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

#### NEPA DETERMINATION

Based upon the 2003 FONSI for DOE/EA-1440 and the information above, the proposed action does not present any extraordinary circumstances and Categorical Exclusion B1.13 would apply.

#### NEPA PROVISION

DOE has made a final NEPA determination for this award

Insert the following language in the award:

If you intend to make changes to the scope or objective of your project you are required to contact the Project Officer identified in Block 11 of the Notice of Financial Assistance Award before proceeding. You must receive notification of approval from the DOE Contracting Officer prior to commencing with work beyond that currently approved.

Note to Specialist :

EF2a prepared by Rob Smith on 11/9/11.

**SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.**

NEPA Compliance Officer Signature: \_\_\_\_\_ Lori Gray *Lori Gray*  
NEPA Compliance Officer

Date: 11/14/2011

**FIELD OFFICE MANAGER DETERMINATION**

Field Office Manager review required

**NCO REQUESTS THE FIELD OFFICE MANAGER REVIEW FOR THE FOLLOWING REASON:**

- Proposed action fits within a categorical exclusion but involves a high profile or controversial issue that warrants Field Office Manager's attention.
- Proposed action falls within an EA or EIS category and therefore requires Field Office Manager's review and determination.

**BASED ON MY REVIEW I CONCUR WITH THE DETERMINATION OF THE NCO :**

Field Office Manager's Signature: \_\_\_\_\_  
Field Office Manager

Date: \_\_\_\_\_