



GENERAL SERVICES ADMINISTRATION – REGION 2  
CATEGORICAL EXCLUSION CHECKLIST DOCUMENTATION

for

RENOVATIONS AND ADDITION TO THE  
COMMERCIAL BUILDING, PEACE BRIDGE PLAZA, BUFFALO, NEW YORK



November 2012

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## 1. Introduction

This document is an environmental analysis required by the National Environmental Policy Act (NEPA) of a proposed federal action being taken by the General Services Administration (GSA) that would be occurring at the Peace Bridge Plaza in Buffalo, New York. In particular, this analysis is a Checklist Categorical Exclusion (CATEX) – a study to determine if the level of environmental analysis appropriate for the proposed federal action at this location is eligible for a CATEX, or whether a more detailed examination is appropriate, in the form of an Environmental Assessment (EA) or an Environmental Impact Statement (EIS). To be precise, the proposed federal action being analyzed in this Checklist CATEX is the supplemental lease agreement/lease amendment of a lease of a structure on the Peace Bridge Plaza, which the United States has occupied as a lessee for 28 years, and where prior to executing this supplemental lease agreement/lease amendment, the owner of the structure and underlying and adjoining lands (i.e., the Peace Bridge Authority - PBA) has proposed a series of steps to improve the structure in question with only minor adjustments to the footprint of this structure. The PBA is a quasi-State of New York entity, who intends on improving the structure in question at its own expense, and with minimal involvement by the United States in the scope and nature of such improvements.

Despite the apparent limited scope of the proposed federal action in this case – improvements of a structure to be performed on behalf of the United States but not at the expense of the United States, followed by the execution of a supplemental lease agreement/lease amendment for an improved structure - this analysis seeks to determine if there are any “extraordinary circumstances” present in this case that compel an EA or an EIS as is required by GSA’s NEPA implementing regulations, the GSA PBS NEPA Desk Guide (October 1999). A description of the environmental conditions present on and surrounding the project site are provided below to support the findings of the Checklist CATEX that follow.

The preparation of a CATEX analysis is appropriate for proposed federal actions that involve acquisition of space by lease construction, or expansion or improvements of an existing facility where all the following conditions are met:<sup>1</sup>

- 1 The structure and proposed use are substantially in compliance with local planning and zoning and any applicable State or Federal requirements;
- 2 The proposed use will not substantially increase the number of motor vehicles at the facility;
- 3 The site and the scale of construction are consistent with those of existing adjacent or nearby buildings; and
- 4 There is no evidence of community controversy or other environmental issues.

This CATEX Checklist demonstrates that the proposed action satisfies the conditions cited above. The basis for this conclusion in part is the project information submitted to GSA by PBA. Finally, this CATEX Checklist and supporting documentation do not remove responsibility from the Peace Bridge Authority, the owner and developer of the proposed action, to obtain any approvals, permits and/or environmental reviews that would be normally required for a construction project at this location.

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<sup>1</sup> U.S. General Services Administration, *PBS National Environmental Policy Act, NEPA Desk Guide*, October 1999.

## 2. Description of Proposed Action

### Background

The Buffalo and Fort Erie Public Bridge Authority ("PBA") is an international compact entity created pursuant to a compact entered into by the State of New York, with the consent of the United States Congress, and by the Government of Canada. The PBA is governed by a ten member Board consisting of five members from New York State and five members from Canada. The mission of PBA is to be known as the premier Canada-United States international border crossing, providing excellence in customer service and an effective conduit for trade and tourism.

### The Peace Bridge

The Peace Bridge links the border crossing facility in Fort Erie in Canada with the facility in Buffalo, New York (Figure 1 and Figure 2). The border crossing facility in Buffalo (the Plaza) is approximately 15 acres in size and provides an area for vehicle screening, administration offices and on-site parking, a duty-free retail outlet and vehicle inspection. Vehicle inspection operations, including truck bays and space to examine the unloaded contents of vehicles, occupy a portion of the Commercial Building.

### The Commercial Building

PBA's U.S. operations facilitate border crossing operations and include customs inspections for passenger vehicles and inspection of vehicles transporting goods between Canada and the U.S. The Commercial Building contains offices and program space for the U.S. Food and Drug Administration, U.S. Customs and Border Protection, U.S. Department of Agriculture and the U.S. Customs and Immigration Enforcement. In addition, the Commercial Building contains office space for private customs brokers.

Program space within the building (1) provides areas for the secondary inspection of trucks and their contents after passing through a preliminary screening process, (2) provides a processing area for those in violation of border crossing regulations, and (3) provides space for the inspection of agricultural products.

The existing Commercial Building consists of two connected structures. One is a one-story, approximately 23,500 square foot (sf) warehouse facility (Warehouse) built circa 1952 that includes a basement containing mechanical and electrical spaces, a partial second floor containing broker's offices and at-grade truck inspection bays. Contiguous with this building is a three-story, approximately 20,000 sf annex facility (Annex) built circa 1979 containing office space on each floor that serve federal agencies (Customs Border Protection, U.S. Food and Drug Administration, U.S. Department of Agriculture, and U.S. Immigration and Customs Enforcement) and private brokers (Federal Express, United Parcel Service, etc.).

The U.S. Plaza of the PBA is located on the west side of Buffalo and adjacent to the Niagara River. The Plaza is bordered on the west and north by Interstate 90 and on the east by Busti Avenue and residential and institutional uses. South of the Plaza is Front Park, approximately 25 acres in size and designed by Fredric Law Olmsted. The Commercial Building is located at the southern portion of the plaza, and south of the building is an access ramp to the Peace Bridge and south of the access ramp is Front Park.

### Description of the Proposed Action

PBA proposes to renovate and increase program space to the existing Commercial Building located on the PBA's U.S. Plaza. The proposed action is a supplemental lease agreement/lease amendment between

PBA and GSA for continued use of space in the Commercial Building after the building has been renovated and expanded (the project). The existing Commercial Building is located on PBA property and the design and construction work is being funded by the Peace Bridge Authority. GSA would expend no funds for this project but would be leasing space in the building from PBA. Federal agency tenants are expected to occupy approximately 60 percentage of the building. The Peace Bridge Authority has no plans to recapture their construction costs through increased rent to GSA. The project includes the complete interior and exterior renovation of the existing Commercial Building (Warehouse and Annex) structure and the addition of a two-story, 20,800 sf addition to the south side of the existing facility (see Figure 3). Figure 4 and Figure 5 provide illustrations of the proposed project from the northwest and southwest perspectives.

The project would not increase the amount of impervious surfaces on the Plaza and would not extend beyond the Plaza boundaries. The existing Commercial Building operates 24 hours per day, 365 day per year, and as such, the proposed renovations and additions would need to be phased and sequenced to allow all work to take place while minimizing the impact to the ongoing facility operations. The renovated building would largely occupy the existing footprint, and the height of the Warehouse and Annex would remain roughly as it now exists. The two-story 20,800 sf addition along the southern side of the building would be supported by columns over the existing parking area such that after completion of the project the number of existing parking spaces would not change. The new façade for the building would be a combination of materials designed to increase thermal retention within the building and thus reduce the amount of energy used for heating and cooling. The masonry wall behind sun-facing glazed areas would have openings and act as trombe walls.

The existing facility utilizes natural gas-fired steam boilers that provide primary heat for the building. Supplemental heating is provided by rooftop equipment and infra-red radiant heaters. The existing boilers and domestic water heater vent to the exterior utilizing the existing stack which extends well above the existing roof. The proposed HVAC system is a Variable Refrigerant Flow (VRF) system which performs simultaneous heating and cooling throughout the building. The VRF system is electrically powered and would greatly reduce the amount of emissions. Natural gas-fired equipment would be limited to the domestic water heating, loading docks, entranceways, and snowmelt systems. The proposed hydronic heating and snowmelt systems would be comprised of four gas-fired high efficiency condensing type boilers. Each boiler which would be vented to the exterior utilizing a 4-inch-diameter vent pipe through the roof. The existing boiler stack would be demolished.

Based on the previous year natural gas consumption, the existing building emits approximately 19,787 tons of carbon dioxide per year. The projected amount of carbon dioxide emitted by the proposed HVAC system is approximately 2,735 tons of carbon dioxide per year. This represents an estimated 86 percent reduction in building emissions annually.

The renovations would also include new electrical service and distribution, new lighting systems with greater energy efficiency, and the installation of roof-mounted photovoltaic solar collectors. New low flow water-saving bathroom fixtures would replace current fixtures.

The existing truck bays and maintenance areas in the building currently drain directly into the City's combined sewer system without pre-treatment. The proposed renovations would install an oil-water separator to remove oil from the run-off from these areas prior to draining into the City's combined sewer system.

Currently, inspections personnel are located in a separate building, dividing their activities between their home offices and their inspections activities. The proposed project would provide enough additional space to allow Federal inspection personnel to be housed in the same building where inspections occur, greatly increasing operational efficiencies. The project would help expedite truck traffic at the border and reduce the amount of time trucks are in the Inspection Areas waiting for Inspectors to arrive. The project would also expand facilities for Homeland Security personnel, including Customs and Border Protection.

## Construction

PBA proposes implementing green practices during construction, including specifying the use of ultra-low sulfur diesel (ULSD) in diesel-fueled construction equipment and vehicles with engine ratings of 50 HP or greater, to reduce emissions associated with construction activities. As a side note, these green practices are the kinds of actions that GSA is undertaking nationwide in new and existing construction, pursuant to GSA's emphasis on sustainability, as mandated by Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance. Also the PBA is pursuing a United State Green Building Council (USGBC) Leadership Energy and Environmental Design (LEED) certification for the renovated building. Construction equipment will not be allowed to idle for more than 5 consecutive minutes, and most construction waste will be recycled. The new construction of the office space, along with the proposed renovation of the Warehouse and Annex buildings will be designed in accordance with the structural requirements of the current Building Code of New York State and the Existing Building Code of New York State, respectively.

In order to provide continuous operation of the border crossing facility, with the least amount of disruptions to the operations of the border station and help prevent traffic congestion, the project would be conducted in a phased and sequenced approach. The project would be completed in four phases of construction over two years, and program space constructed in each phase would be complete and occupied prior to moving to the next phase.

Phase 1 of the project would involve the construction of the new addition to the south side of the Warehouse. It is anticipated that this phase would be complete prior to beginning subsequent phases to allow existing facility operation to continue uninterrupted. Phase 1 would also include renovation of the mechanical and electrical systems located in the basement of the Warehouse facility. The basement level parking area (outdoors) under the new addition would be temporarily vacated of automobiles. Parking elsewhere on the Plaza or at an existing PBA-owned lot adjacent to the Plaza would provide temporary parking for these vehicles.

Phase 2 of the project would begin after occupants of the Annex building are relocated to the addition completed in Phase 1 of the project. Construction of Phase 2 would involve the removal and replacement of the existing exterior façade, replacement of the roof membrane and replacement of the interior walls and systems of the Annex portion of the building.

Phase 3 and Phase 4 of the project would involve renovation of the Warehouse portion of the building and would begin after the renovated Annex is complete. Phase 3 work would consist of renovating the western half of the Warehouse structure, including demolition and removal of the mezzanine, excavation to a depth of approximately four feet below the existing surface for the four truck inspection bays, renovation of the existing loading dock area and construction of the new FDA offices. The existing truck bays located in the Phase 4 area would be maintained as the primary inspection bays during Phase 3 work.

Phase 4 work would consist of renovation the eastern half of the Warehouse structure, including the demolition and removal of the remaining portion of the second level mezzanine and complete renovation of the existing truck bays. During renovation of the truck bays for Phase 3 and Phase 4 fewer truck bays would be available for use. Because under the existing conditions the truck bays are rarely fully occupied, it is expected that the temporary reduction in the number of operational truck bays would not significantly affect normal operations.

Depending on the size of the lay-down area required by contractors for construction equipment and construction materials, a small number of vehicles (fewer than 30) would be relocated to an existing parking lot on PBA-owned property located adjacent to Busti Avenue between Rhode Island Street and Massachusetts Avenue, northeast of the Plaza. Many of these vehicles are not used on a daily basis.

The proposed construction would involve less than one acre of land. PBA intends to comply with all applicable state regulations regarding stormwater management. There will be a basic Storm Water Pollution Prevention Plan (SWPPP) for construction activities that will include erosion and sediment controls. This document and the associated project plans will establish best management practices to minimize the amount of sediment entering the City's sewer system.

### 3. Categorical Exclusion Checklist

#### Renovation & Additions to Commercial Building, Buffalo & Fort Erie Public Bridge Authority, 1 Peace Bridge Plaza, Buffalo, NY 14213-2494

All Checklist CATEX Actions		YES	NO	NEED DATA
<b>A. Is the action likely to be inconsistent with any applicable Federal, State, Indian tribal, or local law, regulation, or standard designed to protect any aspect of the environment?</b>			X	
COMMENTS:	See comment section below			
<b>B. Is the action likely to have results that are inconsistent with locally desired social, economic, or other environmental conditions?</b>			X	
COMMENTS:	See comment section below			
<b>C. Is the action likely to result in the use, storage, release and/or disposal of toxic, hazardous, or radioactive materials, or in the exposure of people to such materials?</b>		X		
COMMENTS:	See comment section below			
<b>D. Is the action likely to adversely affect a significant aspect of the natural environment?</b>			X	
COMMENTS:	See comment section below			
<b>E. Is the action likely to adversely affect a significant aspect of the socio-cultural environment?</b>			X	
COMMENTS:	See comment section below			
<b>F. Is the action likely to generate controversy on environmental grounds?</b>			X	
COMMENTS:	See comment section below			
<b>G. Is there a high level of uncertainty about the action's environmental effects?</b>			X	
COMMENTS:	See comment section below			
<b>H. Is the action likely to do something especially risky to the human environment?</b>			X	
COMMENTS:	See comment section below			
<b>I. Is the action part of an ongoing pattern of actions (whether under the control of GSA or others) that are cumulatively likely to have adverse effects on the human environment?</b>			X	



COMMENTS:	See comment section below		
J. Is the action likely to set a precedent for, or represent a decision in principle about, future GSA actions that could have significant effects on the human environment?		X	
COMMENTS:	See comment section below		
K. Does this delineated area contain historic buildings?		X	
COMMENTS:	See comment section below		
L. Is this facility or delineated area in a 100-yr or 500-yr floodplain?		X	
COMMENTS:	See comment section below		
M. Is this facility or delineated area in a high risk seismic zone?		X	
COMMENTS:	See comment section below		
N. Is the action likely to have some other adverse effect on public health and safety or on any other environmental media or resources that are not specifically identified above?		X	

## CONCLUSIONS:

The action is a CATEX and requires no further environmental review.	Yes
The action is a CATEX but requires further review under one or more other environmental authorities.	NO
The action requires an EA.	NO
The action requires an EIS.	NO

 11/15/2012

Doug Pierson Date

Louis Berger Group



Thomas Burke, NEPA Coordinator Date

REQA Representative

11/15/2012

## 4. Detailed Comment Section

Checklist Question A. *Is the action likely to be inconsistent with any applicable Federal, State, Indian tribal, or local law, regulation, or standard designed to protect any aspect of the environment?*

The project would occur largely within the footprint of the existing building. The height of the new addition would be below that of the existing Annex. The project would be compliant with applicable Federal, State, Indian tribal, or local law regulations, and standards, including, but not limited to, those related to solid waste, noise, historic properties, and air quality. If applicable, PBA may obtain as necessary a State Pollutant Discharge Elimination System (SPDES) permit for construction activity.

The project would take place approximately 550 feet east of the Niagara River/Lake Erie waterfront, in the Coastal Zone (see Figure 6) as delineated by New York State Department of State (NYS DOS). The project would not change the existing use of the Plaza and would not directly or indirectly affect the shoreline or affect the use and enjoyment of the waterfront. Because the project area is located in the Coastal Zone, the project may be subject to a Coastal Zone Consistency Review. If necessary, the PBA would coordinate with NYSDOS and conduct a Coastal Zone Consistency Review to demonstrate that the project complies with New York State's approved Coastal Management Program.

Checklist Question B. *Is the action likely to have results that are inconsistent with locally desired social, economic, or other environmental conditions?*

The project would not significantly change the nature of the existing operations of the border crossing. Staffing within the Commercial Building, both during construction and after completion of the project, is not expected to change from current conditions. The project is not expected to increase traffic across the bridge or increase the number of truck inspections at the facility. Although a negligible increase in truck trips and passenger vehicle trips to the Plaza is expected due to construction material deliveries and construction worker commuting, this increase would be short-term and temporary. After construction of the project, no increase of vehicle trips to or from the facility is anticipated as a result of the project, and traffic patterns will remain the same. The project would not affect local social, economic or other environmental conditions. Because the project would modernize the existing building and provide customized program space, government agencies and private brokers would operate more efficiently.

There will be no adverse local or regional environmental effects because the proposed action would take place largely within the existing Commercial Building footprint. Because the project would include the installation of energy efficient building systems, energy and water demands would decrease. Given the sustainability and environmental conservation initiatives associated with the project the new commercial building would have decreased energy and utility usage resulting in long-term reduction of environmental impacts.

Checklist Question C. *Is the action likely to result in the use, storage, release and/or disposal of toxic, hazardous, or radioactive materials, or in the exposure of people to such materials?*

Yes. The project would include the abatement of asbestos-containing materials (ACMs). Asbestos-containing materials are present at the complex and would be abated as part of the project. Abatement

shall be completed by a licensed and approved professional and will not result in release or exposure of these materials. Disposal of ACM and any other hazardous materials discovered during the renovation will be conducted in accordance with, and consistent with, all applicable regulations. The use of any materials that could be categorized as toxic or hazardous, such as paints or other approved building materials, would be within all appropriate guidelines and instructions for proper use. Steps would be taken to ensure that members of the public will not be exposed to such materials that could result in adverse effects. All applications of potentially dangerous materials would be within labeling guidance and per manufacturer's directions. Best management practices would be maintained at all times to ensure that no spills or leaks will result in the release of any potentially hazardous materials.

Any underground storage tanks or fuel tanks that are to be removed will be done in accordance with all applicable regulations, policies and guidelines. PBA will address, as part of their project plans and as appropriate, any issues with floor drains, hydraulic lifts and oil/water separators at the commercial building.

Checklist Question D. *Is the action likely to adversely affect a significant aspect of the natural environment?*

The project would not adversely affect a significant aspect of the natural environment because all actions will occur within the footprint of existing buildings except for an approximately 20,800 sf, two-story addition which would be elevated on supports to allow continuation of the existing parking underneath. The staging area for contractors and temporary storage of construction materials would be located on a paved portion of the Plaza. The natural environment, including landscape vegetation existing along some portions of the Plaza perimeter would not be disturbed. The Plaza is paved and an impervious surface and the surface water/stormwater collection systems minimize the amount of surface water infiltration into the groundwater. Also, the project is not located within a primary, principal, or sole source aquifer and potable water is supplied by the City of Buffalo.

The Commercial Building is located approximately 500 feet east of the North Buffalo Harbor, a New York State Department of Environmental Conservation (NYSDEC) Significant Coastal Fish & Wildlife Habitat. Construction and operation of the project would not destroy or significantly impair the viability of this habitat. No threatened or endangered species are present at the project site and therefore no impacts such species are expected to occur. The nearest wetland areas are those associated with Lake Erie, located approximately 550 feet west of the project site. The project would not affect these or any other wetlands.

PBA intends to comply with all applicable State regulations regarding stormwater management. There will be a basic Storm Water Pollution Prevention Plan (SWPPP) for construction activities that will include erosion and sediment controls. In addition, PBA will develop and implement project plans that address noise, dust control, and erosion and sedimentation impacts

Little or no natural habitat exists on the project site, and no threatened or endangered species are known to be present at the project site. Construction activity would be confined to the project site and the area immediately surrounding the project site and would not affect areas off the Plaza. No significant impacts to threatened or endangered species or their habitat are anticipated.

The existing truck bays and maintenance areas in the building currently drain directly into the City's combined sewer system without pre-treatment. The proposed renovations would install an oil-water separator to remove oil from the run-off from these areas prior to draining into the City's combined sewer system.

Checklist Question E: *Is the action likely to adversely affect a significant aspect of the sociocultural environment?*

No. The effects of the project would not displace businesses or residences, would not change roadway network or vehicular or pedestrian travel patterns. Construction of the project would employ construction workers for approximately two years during which time local businesses may benefit from worker expenditures for food and lodging. No aspects of the proposed action would generate significant adverse effects on the sociocultural environment.

Checklist Question F: *Is this action likely to generate controversy on environmental grounds?*

No. This project is not likely to be environmentally controversial. All actions would be within the existing Plaza and the indirect environmental effects associated with the project (i.e., reduced energy use, implementation of sustainable practices, and use of sustainable building materials) would be beneficial to the environment. Also, the proposed project is not adding additional truck inspection bays.

Air emissions associated with the project were considered. Buffalo is in attainment for the National Ambient Air Quality Standards for particular matter of size 2.5 microns and particulate matter of 10 microns (PM<sub>2.5</sub> and PM<sub>10</sub>). Also, recent air sampling for PM<sub>2.5</sub> from two air monitoring stations in the immediate vicinity of the Peace Bridge indicate that PM 2.5 levels are below the National Ambient Air Quality Standards for the pollutant.

Air emissions from diesel trucks transiting the border station have been identified as a concern since they have been reports indicating links between diesel emissions and asthma in the residential areas near the Peace Bridge. However, this project involves the renovation of, and construction of an addition to, an existing building. Construction and operation of the project would not significantly affect the flow of traffic, and in particular diesel truck traffic, across the port. The currently available traffic data show the number of trucks crossing the border at approximately 1.25 million trucks per year and the number of cars crossing the border at approximately 4.77 million cars per year. Any trucks visiting the site as part of construction activities would be negligible when compared to the overall annual truck traffic transiting the port. Non-road construction equipment (diesel equipment) used during the project will follow clean diesel construction practices. The Peace Bridge Authority would adopt "Best Clean Diesel Construction Practices" during the project. These best practices were developed by the Northeast Diesel Collaborative and provide recommendations for actions to minimize diesel emissions during construction. These actions can include use of cleaner fuels (ultra-low sulfur diesel fuel), idle reduction strategies, replacement of old equipment with equipment meeting the latest emission standards, retrofitting engines and equipment with exhaust control technologies, and use of diesel particulate filters.

Also, in order to successfully implement the project with the least amount of disruptions to the operations of the border station and help prevent traffic congestion, the project activities will be conducted in a phased and sequenced approach. The project would be completed in four phases of construction over two

years, and program space constructed in each phase would be complete and occupied prior to moving to the next phase.

The proposed facility will provide space to Federal inspection officers who are currently housed further away. This will increase operational efficiencies and help reduce the amount of time trucks are idle in the inspections areas waiting for the inspectors to arrive.

The new facility is projected to have fewer emissions than the current facility. The current facility uses three steam boilers that are natural gas fired. These will be eliminated under the proposed project and heating and cooling will be provided via a variable refrigerant flow (VRF) heat pump system that does not burn any fossil fuels but uses electricity. Hence the air emissions associated with the old system will be eliminated. Natural gas-fired equipment would be limited to the domestic water heating, loading docks, entranceways, and snowmelt systems. The proposed hydronic heating and snowmelt systems would be comprised of four gas-fired high efficiency condensing type boilers. Based on the previous year natural gas consumption, the existing building emits approximately 19,787 tons of carbon dioxide per year. The projected tons of carbon dioxide for the proposed HVAC system are approximately 2,735 tons of carbon dioxide annually. This represents an estimated 86 percent reduction in building emissions annually.

Construction of the Proposed Project would generate temporary and short-term noise. PBA and its construction contractors will comply with the City of Buffalo noise ordinances. Compliance with local noise ordinances will help to ensure that construction noise would be maintained at the lowest level practicable. Normal construction activities are planned to take place between the work hours of 7:00 am to 7:00 pm. There would be no significant impacts, either individually or cumulatively, to the local environment or quality of life associated with implementation of Proposed Project.

Dust control for all site areas disturbed by construction will be achieved primarily through the application of water to the affected areas. Additional measures would include:

1. Construction entrances will be installed to prevent tracking of mud and soil onto paved roads;
2. Any soil tracked onto a paved road that extends more than 50 feet from the point of origin will be cleaned up by the contractor personnel within one hour of discovery;
3. Any soil tracked onto a paved road that extends less than 50 feet will be cleaned up by the end of each working day; and
4. Erosion control measures will be implemented and limit deposition of silt on roadways and/or runoff of silt into storm drainage structures.

Dust Control for all building related work will be achieved by the construction of temporary dust control barriers that will enclose the exterior portions of the building undergoing existing façade removal and replacement.

Checklist Question G: *Is there a high level of uncertainty about your action's environmental effects?*

No. Renovations and new construction associated with the proposed action would use proven technologies, project plans and construction techniques. There would be little or no uncertainties regarding the potential for adverse environmental consequences.

Checklist Question H: *Is the action likely to do something especially risky to the human environment?*

No. Renovations and new construction associated with the proposed action would use proven technologies, project plans, and construction techniques. There would be little or no unknown or unacceptable risk involved in construction and operation of the proposed action.

Checklist Question I: *Is the action part of an ongoing pattern of actions (whether under the control of GSA or others) that are cumulatively likely to have adverse effects on human environment?*

No. The proposed action involves only the renovation and addition to the Commercial Building. The long-term effects of the proposed action will likely have beneficial effects on the human environment because of a decrease of energy use involved in operating the building and quicker processing of vehicles through the border crossing facility.

Checklist Question J: *Is the action likely to set a precedent for, or represent a decision in principle about, future GSA actions that could have significant effects on the human environment?*

No. The project involves a demonstrated and routine renovation of existing space and construction of an addition that is unlikely to set a precedent for, or represent a decision in principle about, future GSA actions that could have significant effects on the human environment with no unknown or unacceptable risks. The proposed action represents future GSA actions that are consistent with high-performance building, sustainable building, and environmental conservation practices and goals.

Checklist Question K: *Does this delineated area contain historic buildings?*

The existing warehouse is not listed or eligible to be on the National Register of Historic Places. The project is located adjacent to the historic Front Park (National Register Listed) and therefore the New York State Historic Preservation Office (SHPO) was consulted in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966. Due to potential archaeological concerns it was recommended that isolated areas of impacts (for footings) be monitored during construction. It was the SHPO's opinion that the proposed project will have No Adverse Impacts. Correspondence from GSA and the SHPO is included in the appendix.

Checklist Question L: *Is this facility or delineated area in a 100-yr or 500-yr floodplain?*

No. The project site is more than 500 feet distant from the nearest floodplain (see Figure 7).

Checklist Question M: *Is this facility or delineated area in a high risk seismic zone?*

No, the project site is located in an area of low seismic activity (see Figure 8). The design and construction will conform to the seismic provisions of the latest edition of the International Building Code (IBC) in accordance with GSA standard lease clauses.

Checklist Question N: *Is the action likely to have some other adverse effect on public health and safety or on any other environmental media or resources that are not specifically identified above?*

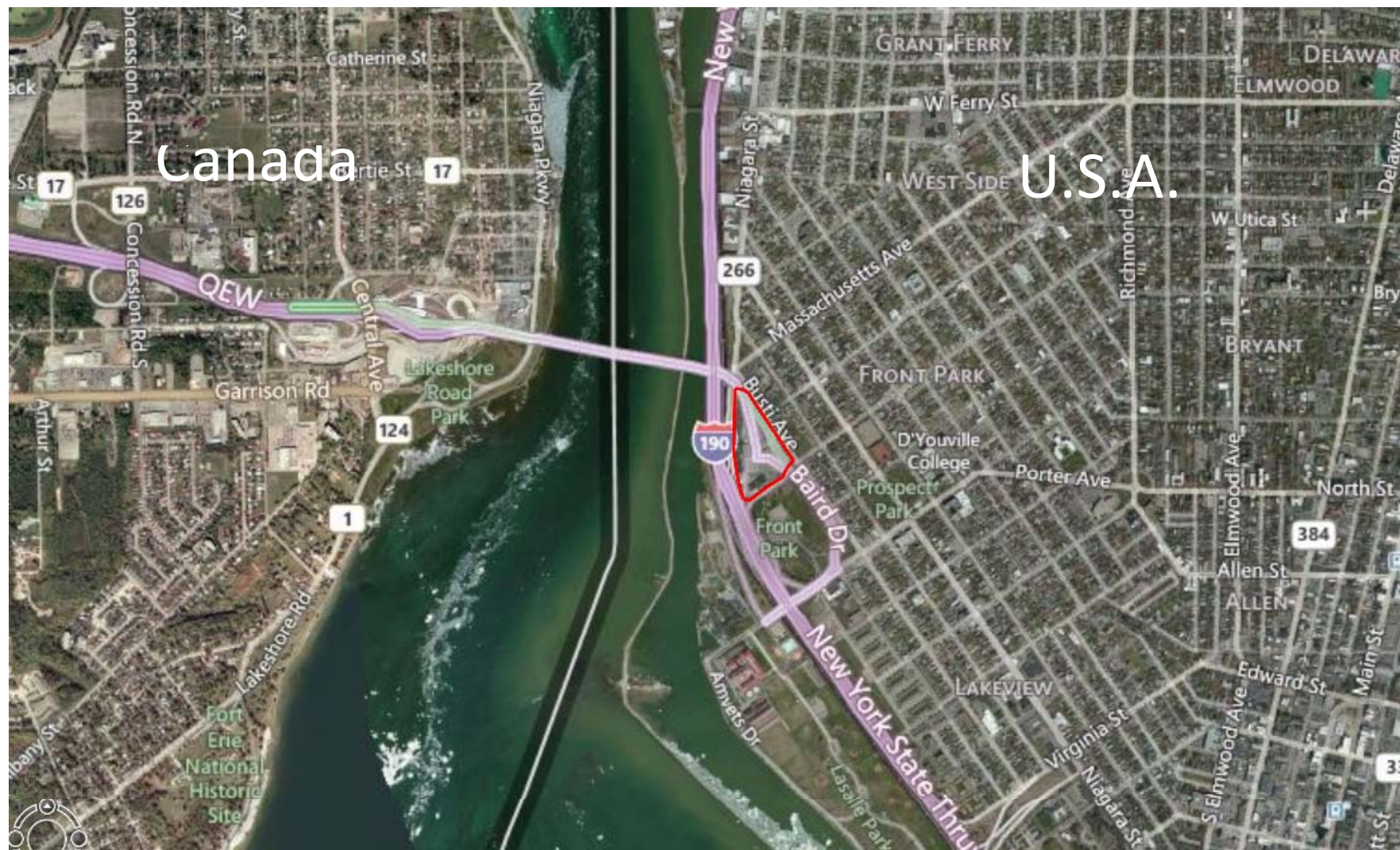
No. The project would decrease the amount of time required for vehicle processing at a border crossing. As such, trucks and other vehicles would spend less time waiting for processing and thus less time idling.

## **5. Conclusion:**

This CATEX checklist and the supporting documentation demonstrate that the Proposed Action would not significantly affect any portion of the built environment or the natural environment. In accordance with the GSA NEPA Desk Guide a CATEX checklist is an appropriate level of NEPA analysis for a lease construction when there are no extraordinary circumstances present that would require an Environmental Assessment (EA) or an Environmental Impact Statement (EIS). This CATEX Checklist supports that there are no extraordinary circumstances.

## **6. Figures**





Source: ESRI

PBA Plaza



0 feet 300

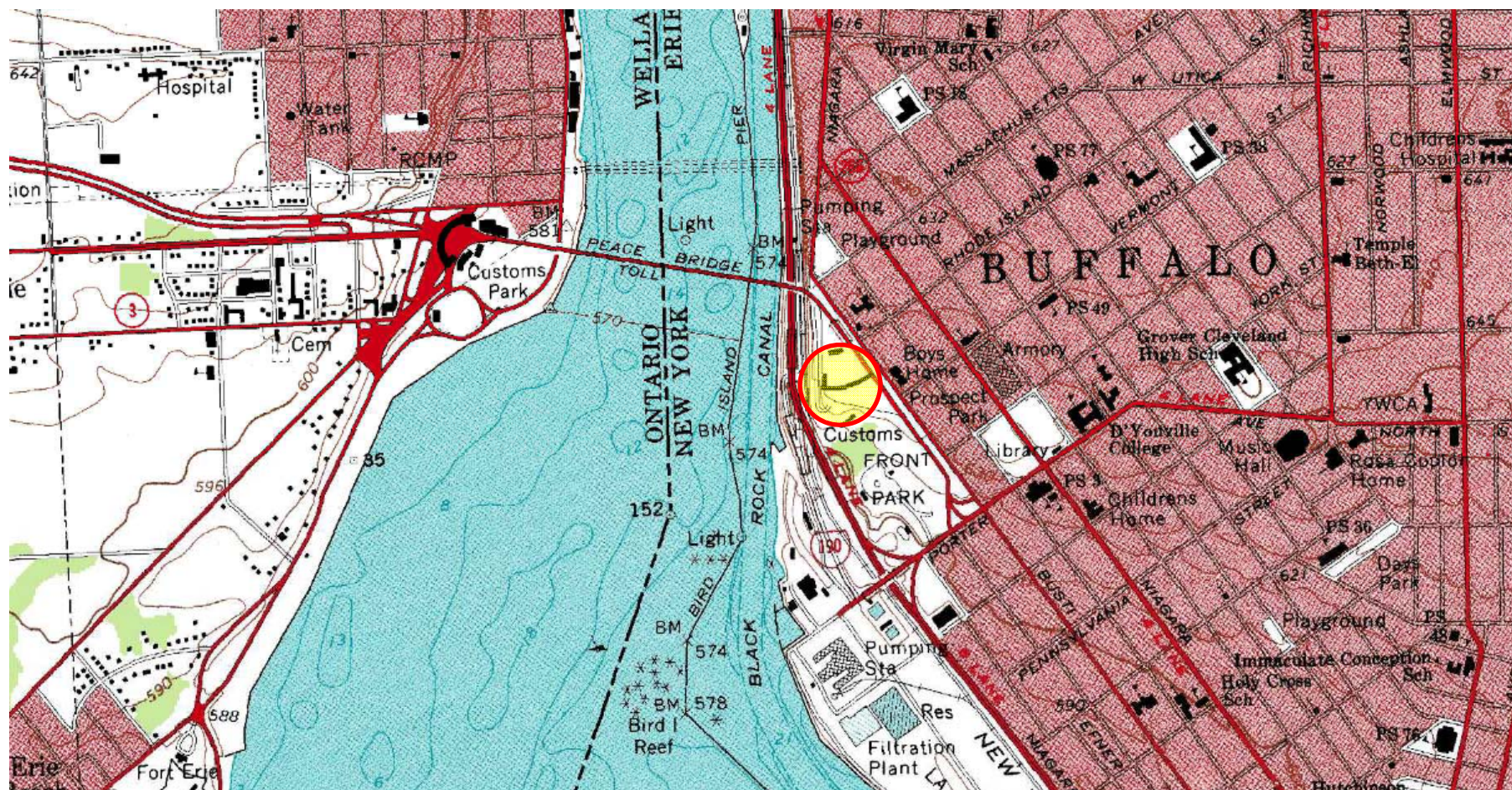


# Figure 1 – Project Location Map

CATEX Checklist, Renovation & Additions to  
Commercial Building, PBA, Buffalo, NY







Source: USGS, Buffalo, NW, N.Y. – Ont., 1965



Project Site

0 feet 2000



## Figure 2 – Site Topographic Map

CATEX Checklist, Renovation & Additions to  
Commercial Building, PBA, Buffalo, NY







Source: ESRI

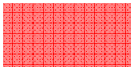


Renovation	
New Construction	
PBA Plaza	

Figure 3 – Project Renovation and Addition

CATEX Checklist, Renovation & Additions to  
Commercial Building, PBA, Buffalo, NY



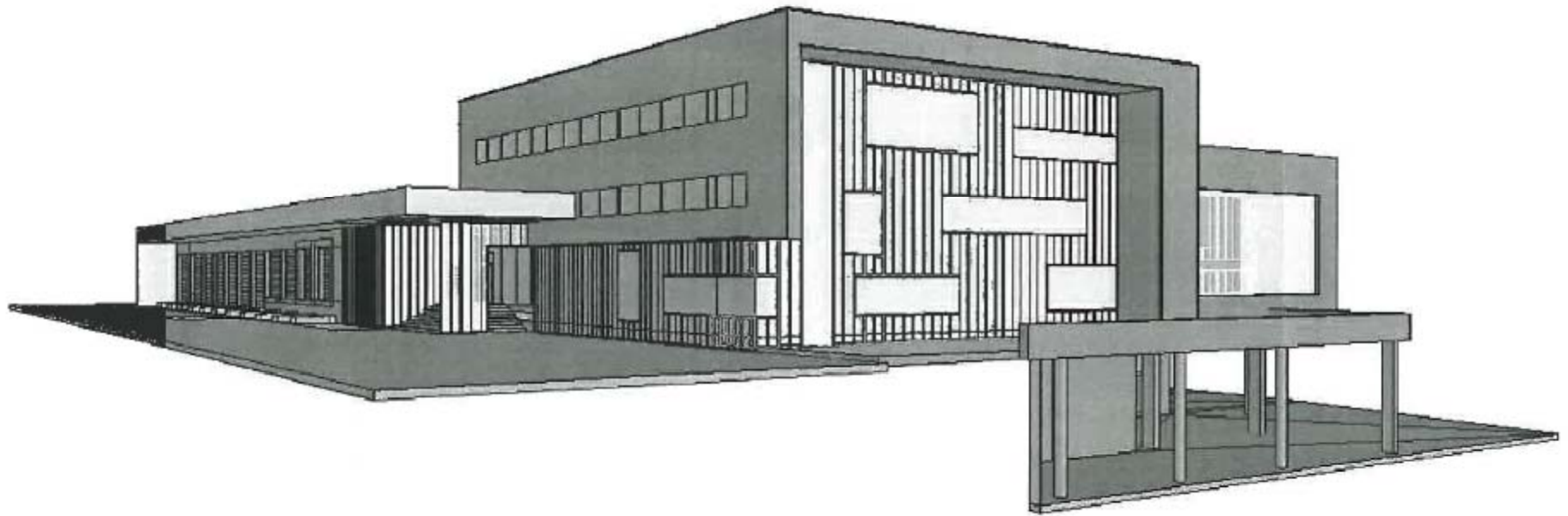


Figure 4 – Northwest Perspective

CATEX Checklist, Renovation & Additions to  
Commercial Building, PBA, Buffalo, NY



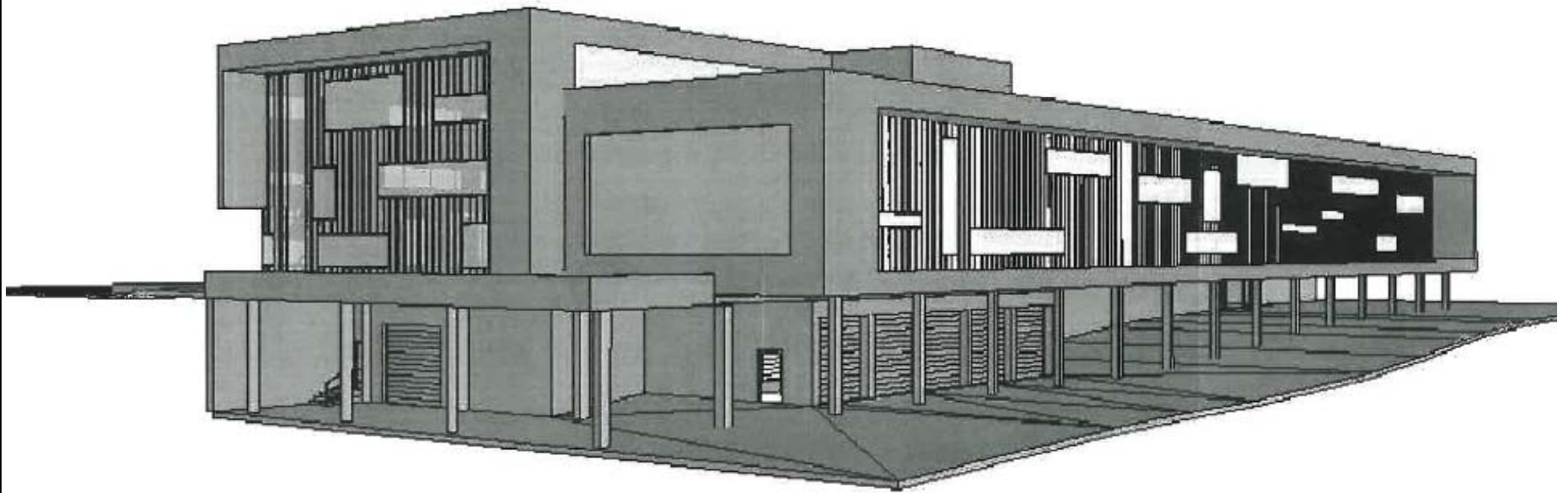


Figure 5 – Southwest Perspective

CATEX Checklist, Renovation & Additions to  
Commercial Building, PBA, Buffalo, NY



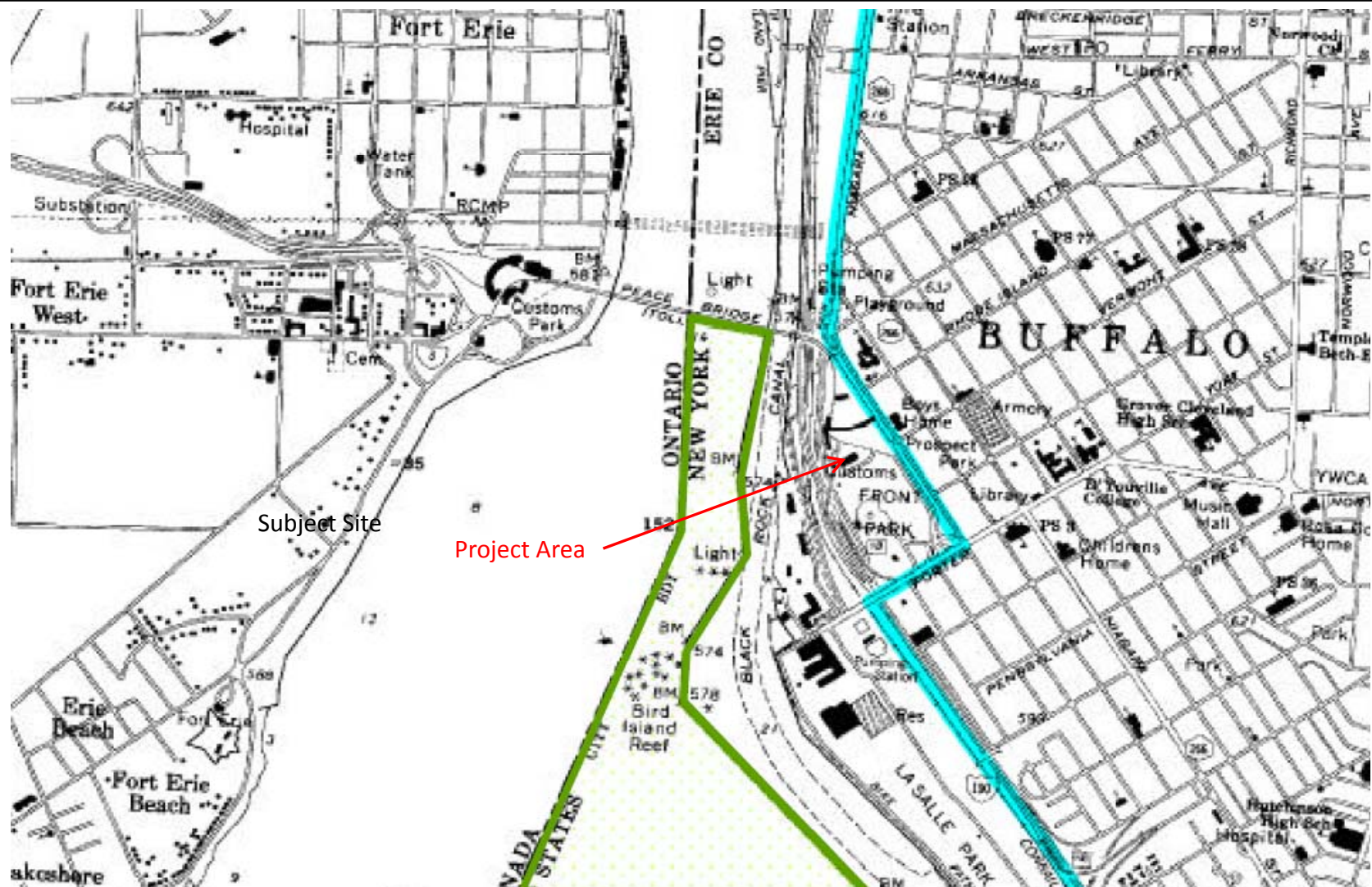


Figure 6 – Rendering

CATEX Checklist, Renovation & Additions to  
Commercial Building, PBA, Buffalo, NY







Source: New York State Department of State

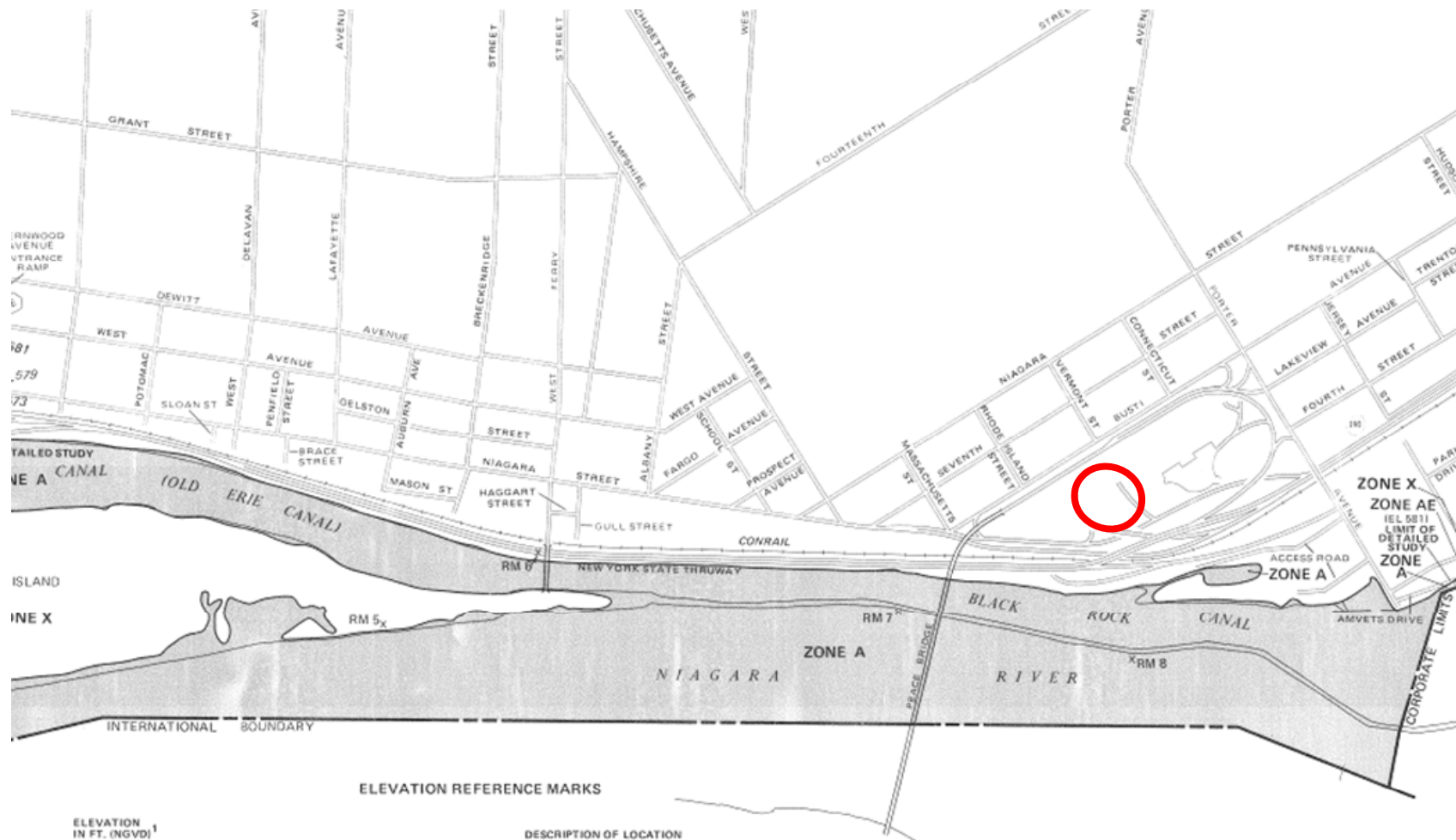
0 feet 2000



# Figure 7: Coastal Zone Boundary Map

CATEX Checklist, Renovation & Additions to  
Commercial Building, PBA, Buffalo, NY





Source: Federal Emergency Management Agency, Flood Insurance Rate Map, Community Panel Number 3602300015C, 1999



Project Site

0 feet 3000

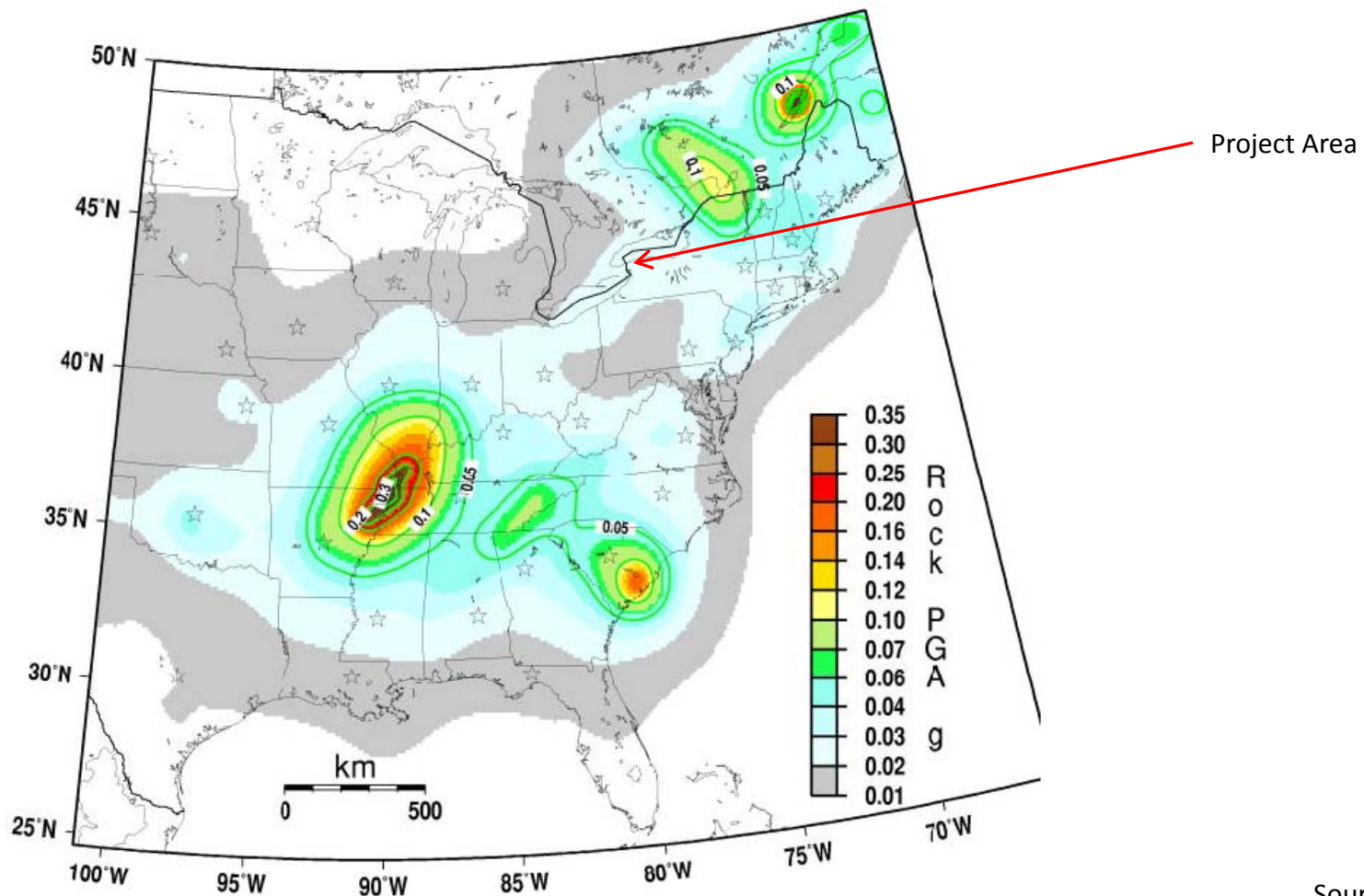


## Figure 8: FEMA Flood Zone Map

CATEX Checklist, Renovation & Additions to  
Commercial Building, PBA, Buffalo, NY







Source: USGS

0 miles 500



Peak Ground Acceleration  
As a Percent of Gravitational  
Acceleration

## Figure 9: Earthquake Hazard Map

CATEX Checklist, Renovation & Additions to  
Commercial Building, PBA, Buffalo, NY



## 7. Photographs



VIEW OF SOUTHERN SIDE OF WAREHOUSE BUILDING FROM THE SOUTHEAST



VIEW OF NORTHERN SIDE OF WAREHOUSE BUILDING FROM THE NORTHEAST





VIEW OF WAREHOUSE BUILDING ANNEX FROM THE NORTH



VIEW TOWARD PROJECT SITE FROM FRONT PARK

## **8. Correspondence**

July 9, 2012

Ruth Pierpont  
Director, NYSHPO  
Peeples Island  
Waterford, NY 12188

Re: Peace Bridge Warehouse Rehabilitation Section 106 Review  
City of Buffalo, Erie County, NY

Dear Ms. Pierpont,

This memo is in reference to Section 106 review for the rehabilitation of the existing main warehouse located at the Peace Bridge Port of Entry, Buffalo, NY. Built c1950, the one-story building w/three-story annex sits on the eastern edge of the site and borders Front Park. The building has been evaluated by GSA and determined not eligible for National Register listing.

The rehabilitation project consists of upgrades to interior, exterior and systems. While the existing footprint (at ground level) will not be enlarged, the upper floors are projected to have a slight increase in plan at the east and south façades. As such, ground disturbance will be minimal and it is recommended that isolated areas of impact (for footings) be monitored during construction. Overall height of the building additions will be below the existing three -story annex height.

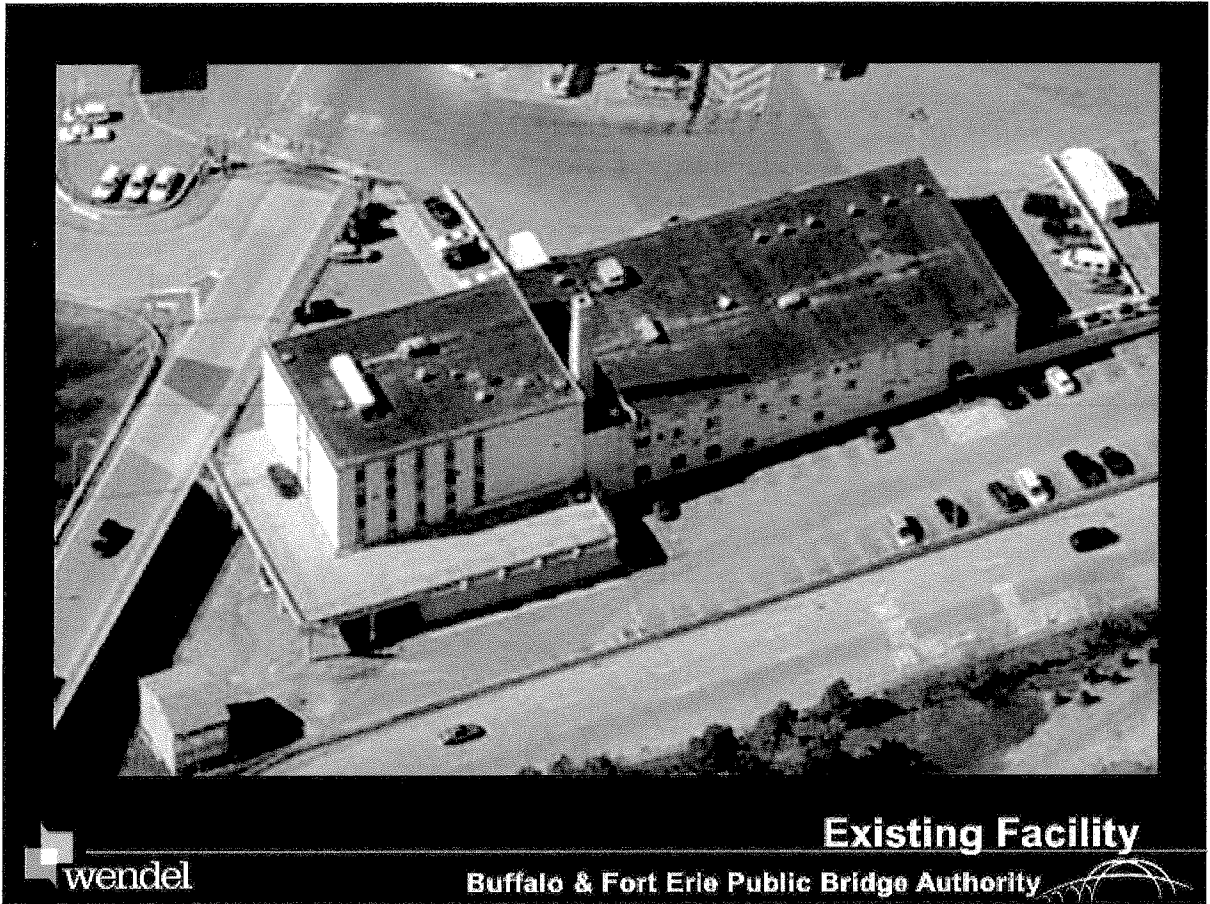
On behalf of Customs and Border Patrol, GSA is the lead federal agency for Section 106 compliance on the warehouse rehabilitation project. GSA concludes that there are no adverse impacts as a result of this proposed rehabilitation. I look forward to receiving your comments and working with your office on this exciting and much-needed improvement to the port.

Best,  
Anthone, David  
Regional Historic Preservation Officer  
646-808-6069

cc: Tom Burke, GSA R2 NEPA  
Eric Cook, Regional Chief Architect  
Tony Braunscheidel, PBA Operations & Facilities Manager  
Sam Hoyt, PBA Chairman  
Att: electronic files

Filename: Anthone/Peacebridge/gsa2shpwarehouse106070212.doc





wendel

**Existing Facility**

Buffalo & Fort Erie Public Bridge Authority



Arial View of Existing Facility



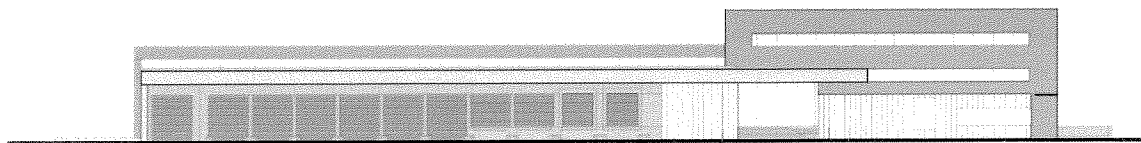


**Existing Facility**

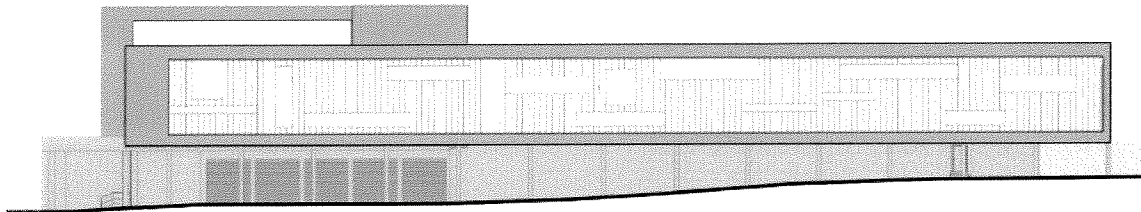
**Buffalo & Fort Erie Public Bridge Authority**



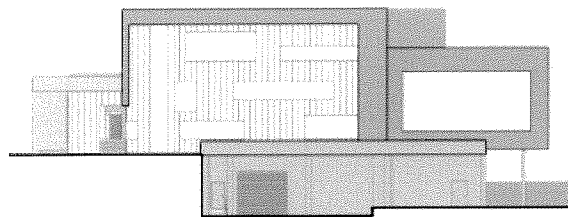
East Façade of Existing Facility. Photograph taken from Front Park



North Elevation



South Elevation



West Elevation



Design Schematics for Warehouse



## New York State Office of Parks, Recreation and Historic Preservation

Division for Historic Preservation  
Peebles Island, PO Box 189, Waterford, New York 12188-0189  
518-237-8643  
[www.nysparks.com](http://www.nysparks.com)

**Andrew M. Cuomo**  
Governor

**Rose Harvey**  
Commissioner

July 11, 2012

David J. Anthone  
U.S. General Services Administration  
Jacob K. Javits Federal Building  
26 Federal Plaza  
New York, New York 10278  
*(via e-mail only)*

Re: GSA  
Peace Bridge Warehouse Rehabilitation/Expansion  
Peace Bridge Port of Entry, Buffalo, Erie County  
12PR02743

Dear Mr. Anthone:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have reviewed the project in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

Based upon this review, it is the SHPO's opinion that your project will have No Adverse Effect upon cultural resources in or eligible for inclusion in the National Registers of Historic Places, including Front Park.

If I can be of any further assistance do not hesitate to contact me at (518) 237-8643, ext. 3263.

Sincerely,

John A. Bonafide  
Director,  
Technical Preservation Services Bureau