



**UNITED STATES DEPARTMENT OF COMMERCE**  
National Institute of Standards and Technology  
Gaithersburg, Maryland 20899

November 22, 2023

MEMORANDUM FOR THE RECORD

From: Mark Liao  
NEPA Coordinator

Subject: Categorical Exclusion

Project Title: Renovation of the Harned Hall Biological Sciences Research Building

Location: Tennessee State University  
3500 John A. Merritt Blvd  
Nashville, TN 37209

The National Environmental Policy Act (NEPA) and associated implementing regulations (40 CFR Parts 1500-1508) require that all major actions by federal agencies be reviewed with respect to the environmental consequences on the human environment. The National Institute of Standards and Technology (NIST) has selected the project: Renovation of the Harned Hall Biological Sciences Research Building at Tennessee State University for a federal funding grant. Consequently, NEPA and the associated implementing regulations apply to this project.

This memorandum summarizes the determination that the Renovation of the Harned Hall, Biological Sciences Research Building at Tennessee State University has been found to be categorically excluded from further environmental review under NEPA.

**Description of the Action**

Constructed in 1927, Harned Hall is 18,504 square feet in size. The Department of Biological Sciences research facilities are housed in Harned Hall which include twenty research labs, three core facility labs (imaging, small animal, and cell culture) and two teaching laboratories.

The purpose of this project is to upgrade the existing infrastructure of the building to state-of-the-art facilities that will provide a conducive environment for research and teaching the latest technical skills to students and researchers. The project will involve modernizing teaching and research laboratory space to accommodate new research platforms. Major renovations will include installing new fume hoods, benchtops, and cabinets and replacing aged/damaged building components (i.e., ceiling tiles and floor tiles). All renovations will be to the interior of the building; no work will be conducted on the exterior of the building or surrounding grounds of

the building. Specifically, 4500 sq ft of research and teaching labs will be renovated within Harned Hall.

A comprehensive assessment was conducted to prioritize the spaces in Harned Hall which would be renovated in this project. The current state of each laboratory space was evaluated, along with the needs of researchers/teachers to identify the areas that were in greatest need of renovation. This project will be accomplished in accordance with all applicable state and federal environmental and safety regulations. All applicable regulatory permitting will be obtained.

### **Specific Considerations of this Action and any Extraordinary Circumstances**

#### **Air Emissions, Stormwater, Wastewater, Critical Habitats**

Since all renovation are to the interior of the building, no significant impacts to air, water resources or critical habitats are expected.

#### **Building Staffing/Utilities**

Staffing at Harned Hall is not expected to increase significantly. Water consumption and electricity use are not expected to change significantly over current building use.

#### **Greenhouse Gas Emissions**

Building renovations are expected to improve the energy efficiency and reduce greenhouse gas emissions resulting from the building. State-of-the art fume hoods and ventilation systems will be more energy efficient than the existing systems.

#### **Flooding Potential and Resilience**

Since all renovation are to the interior of the building, there will be no impact to the flooding potential or flood resilience of this building. Harned Hall is not located within the 500-year floodplain.

#### **Hazardous Materials**

Any hazardous materials (i.e., asbestos, lead based paint, polychlorinated biphenyls) that may be disturbed in the building renovations will be handled and disposed in accordance with State and Federal regulations.

#### **Historic/Cultural Significance**

The renovation tasks planned are not considered to have any historic or cultural impacts on the project site or vicinity. A letter from the Tennessee State Historic Preservation Officer indicating no adverse impacts is attached.

#### **Environmental Justice**

This renovation project is not anticipated to have any disproportional adverse human health or environmental impacts to overburdened and underserved communities, including minority, Tribal, or low-income populations.

**Effects of the Action**

No significant adverse impacts on the environment are expected from this action.

**Categorical Exclusion**

The activities associated with this project fall within the criteria of the following Department of Commerce Categorical Exclusion:

**A-1** Minor renovations and additions to buildings, roads, airfields, grounds, equipment, and other facilities that do not result in a change in the functional use of the real property (*e.g.* realigning interior spaces of an existing building, adding a small storage shed to an existing building, retrofitting for energy conservation, or installing a small antenna on an already existing antenna tower that does not cause the total height to exceed 200 feet and where the FCC would not require an environmental assessment or environmental impact statement for the installation). This CE does not apply in instances where the project must be submitted to the National Capital Planning Commission (NCPC) for review and NCPC determines that it does not have an applicable Categorical Exclusion.

This project is considered a minor renovation of a building that does not change functional use of the real property. The project does not require review by the NCPC. The proposed activity: Renovation of the Harned Hall, Biological Sciences Research Building at Tennessee State University is categorically excluded from the need for further environmental review under NEPA. Any changes to the above project will require additional NEPA review.

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Mark Liao  
NIST NEPA Coordinator

\_\_\_\_\_  
Date

\_\_\_\_\_  
R.C. Vaughn  
NIST Chief Facilities Management Officer

\_\_\_\_\_  
Date

Attachment 1

Tennessee State Historic Preservation Officer's Letter



**TENNESSEE HISTORICAL COMMISSION**  
STATE HISTORIC PRESERVATION OFFICE  
2941 LEBANON PIKE  
NASHVILLE, TENNESSEE 37243-0442  
OFFICE: (615) 532-1550  
[www.tnhistoricalcommission.org](http://www.tnhistoricalcommission.org)

2023-10-02 16:02:23 CDT

Mr. Phillip Neuberg  
NIST  
[phillip.neuberg@nist.gov](mailto:phillip.neuberg@nist.gov)

RE: Department of Commerce (USDOC), Harned Hall Interior Upgrades, Project#: SHPO0003842, Nashville, Davidson County, TN

Dear Mr. Phillip Neuberg:

Pursuant to your request, this office has reviewed documentation concerning the above-referenced undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicants for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800 (Federal Register, December 12, 2000, 77698-77739).

Based on the information provided, we find that the project as currently proposed will not adversely affect Tennessee State University, which is eligible for listing in the National Register of Historic Places.

This office has no objection to the implementation of this project as currently planned. If project plans are changed or previously unevaluated archaeological resources are discovered during project construction, please contact this office to determine what further action, if any, will be necessary to comply with Section 106 of the National Historic Preservation Act. Include the Project # if you need to submit any additional information regarding this undertaking. Questions and comments may be directed to Casey Lee, who drafted this response, at [Casey.Lee@tn.gov](mailto:Casey.Lee@tn.gov), +16152533163. We appreciate your cooperation.

Sincerely,

E. Patrick McIntyre, Jr.  
Executive Director and  
State Historic Preservation Officer