



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

November 9, 2023

MEMORANDUM FOR THE RECORD

From: Mark Liao
NEPA Coordinator
National Institute of Standards and Technology

Subject: Categorical Exclusion

Project: Health Education Building Renovation

Location: University of Toledo
3000 Arlington Avenue Mail Stop 1020,
Toledo, OH 43614-2595

The National Environmental Policy Act (NEPA) and associated implementing regulations (40 CFR Parts 1500-1508) require that all major federal actions be reviewed with respect to their environmental consequences. The National Institute of Standards and Technology (NIST) has selected the project: University of Toledo Health Education Building Renovation for a federal funding grant. Consequently, NEPA and the associated implementing regulations apply to this project.

This memorandum summarizes NIST's environmental review of this project and the determination that the University of Toledo Health Education Building Renovation is categorically excluded from further environmental review under NEPA.

Description of the Action

The Health Education Building (HEB) was originally built in 1975 and is a four-story building that serves multiple purposes for the University of Toledo and the College of Medical and Life Sciences.

In the HEB basement, biosafety level 3 (BSL3) and animal BSL3 (A-BSL3) laboratories are in place to work with highly-infectious and dangerous pathogens. The University of Toledo BSL3/A-BSL3 laboratories have been continuously certified by the U.S. Centers for Disease Control and Prevention since 1999.

Two major limitations exist for the BSL3/A-BSL3 laboratories. (1) The current BSL3/A-BSL3 is too small (1,099 ft²) to accommodate additional research projects, and (2) the existing spaces require renovation to be more efficient, provide additional housing and procedure rooms, and create isolated rooms for specialized research needs.

The renovation of the HEB will include the following:

Expand and renovate the existing BSL3/A-BSL3 facilities, create 3 new biocontainment suites, new shared entry/exit space, and shared equipment spaces. These 3 new suites will be used to study diseases like plague, anthrax, and tularemia.

Remodel 21 existing rooms, unused/redundant hallways, and underutilized spaces (14,350 ft² gross renovation; 11,308 ft² room renovations) into new multi-purpose rooms for either animal procedures and/or animal housing, including the creation of a new isolation suite that could be used for germ-free/microbiome studies.

All renovation work at the HEB 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.

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 the HEB 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.

Flooding Potential and Resilience

Since all renovations are to the interior of the building, there will be no impact to the flooding potential or flood resilience of this building.

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.

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.

Historic/Cultural Significance

The renovation tasks planned are not considered to have any historic or cultural impacts on the project site or vicinity.

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.

Since this grant will only fund the interior renovation of the existing University of Toledo Health Education Building, with no change in the functional use of the building, and the project does not require review by the NCPC, the project meets the criteria specified in categorical exclusion A-1. The proposed project, University of Toledo Health Education Building Renovation is categorically excluded from the need for further environmental review under NEPA. Any changes to the above project will require additional NEPA review.

Mark Liao
NIST NEPA Coordinator

Date

R.C. Vaughn
NIST Chief Facilities Management Officer

Date

Attachment 1

Letter from the Ohio State Historic Preservation Officer



In reply, refer to
2023-LUC-59306

November 3, 2023

Phillip W. Neuberg
Architect & Federal Preservation Officer
100 Bureau Drive, MS 190
Gaithersburg, MD 202899
phillip.neuberg@nist.gov

**RE: University of Toledo Health Science Campus (HSC), Health Education Building (HEB)
3100 Transverse Drive, Toledo, OH 43614**

Dear Mr. Neuberg:

This letter is in response to correspondence received on October 5, 2023. The comments of Ohio's State Historic Preservation Office (SHPO) are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

Although the subject building has not yet met the 50 year minimum for inclusion in the National Register of Historic Places (NRHP), the University of Toledo HSC Health Education Building (HEB) is considered potentially eligible for listing in the NRHP under Criterion C for its architectural style. Proposed work includes interior renovations and rehabilitation of the basement level vivaria and animal care laboratories. There is no proposed exterior work.

Therefore, it is the opinion of the SHPO that the planned work, if completed as proposed, will have **No Adverse Effect** on historic properties. No further coordination with this office is necessary, unless there is a change in the proposed project.

If you have any questions, please contact Kristen Koehlinger at kkoehlinger@ohiohistory.org or (614) 298-2000. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Krista Horrocks".

Krista Horrocks (for Kristen Koehlinger)
Interim Department Head and Deputy State Historic Preservation Officer
Resource Protection & Review

"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."
RPR Serial No: 1100120