

**U.S. DEPARTMENT OF ENERGY
OFFICE OF ENERGY EFFICIENCY AND RENEWABLE ENERGY
NEPA DETERMINATION**



RECIPIENT: Highland Park Technologies, LLC

STATE: MA

PROJECT TITLE : A TIGHT ENCLOSURE ON THE PATH TO NET ZERO

| | | | |
|--|--------------------------------------|----------------------------|-------------------|
| Funding Opportunity Announcement Number | Procurement Instrument Number | NEPA Control Number | CID Number |
| DE-FOA-0002788 | DE-EE0010910 | GFO-0010910-001 | GO10910 |

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

CX, EA, EIS APPENDIX AND NUMBER:

Description:

A9 Information gathering, analysis, and dissemination

Information gathering (including, but not limited to, literature surveys, inventories, site visits, and audits), data analysis (including, but not limited to, computer modeling), document preparation (including, but not limited to, conceptual design, feasibility studies, and analytical energy supply and demand studies), and information dissemination (including, but not limited to, document publication and distribution, and classroom training and informational programs), but not including site characterization or environmental monitoring. (See also B3.1 of appendix B to this subpart.)

B5.1 Actions to conserve energy or water

(a) Actions to conserve energy or water, demonstrate potential energy or water conservation, and promote energy efficiency that would not have the potential to cause significant changes in the indoor or outdoor concentrations of potentially harmful substances. These actions may involve financial and technical assistance to individuals (such as builders, owners, consultants, manufacturers, and designers), organizations (such as utilities), and governments (such as state, local, and tribal). Covered actions include, but are not limited to weatherization (such as insulation and replacing windows and doors); programmed lowering of thermostat settings; placement of timers on hot water heaters; installation or replacement of energy efficient lighting, low-flow plumbing fixtures (such as faucets, toilets, and showerheads), heating, ventilation, and air conditioning systems, and appliances; installation of drip-irrigation systems; improvements in generator efficiency and appliance efficiency ratings; efficiency improvements for vehicles and transportation (such as fleet changeout); power storage (such as flywheels and batteries, generally less than 10 megawatt equivalent); transportation management systems (such as traffic signal control systems, car navigation, speed cameras, and automatic plate number recognition); development of energy-efficient manufacturing, industrial, or building practices; and small-scale energy efficiency and conservation research and development and small-scale pilot projects. Covered actions include building renovations or new structures, provided that they occur in a previously disturbed or developed area. Covered actions could involve commercial, residential, agricultural, academic, institutional, or industrial sectors. Covered actions do not include rulemakings, standard-settings, or proposed DOE legislation, except for those actions listed in B5.1(b) of this appendix. (b) Covered actions include rulemakings that establish energy conservation standards for consumer products and industrial equipment, provided that the actions would not: (1) have the potential to cause a significant change in manufacturing infrastructure (such as construction of new manufacturing plants with considerable associated ground disturbance); (2) involve significant unresolved conflicts concerning alternative uses of available resources (such as rare or limited raw materials); (3) have the potential to result in a significant increase in the disposal of materials posing significant risks to human health and the environment (such as RCRA hazardous wastes); or (4) have the potential to cause a significant increase in energy consumption in a state or region.

Rationale for determination:

The U.S. Department of Energy (DOE) is proposing to provide funding to Highland Park Technologies, LLC to explore the viability of a wood fiber panel with an insulated mounting system as an alternative to petrochemical-intensive retrofit cladding. The panels would be fabricated in a laboratory setting and installed in the field on existing buildings using a clip system. Award activities would include specification and testing of component materials, refinement of design, manufacturing of panels, installation and monitoring of cladding on buildings, and resolving potential technical and marketing issues.

Project activities would occur over three budget periods (BPs.) Field activities (case studies) are included in BP2 (Case Study 1) and BP3 (Case Study 2 and Case Study 3.) The site for Case Study 3 has not yet been selected; if the location selected by the Recipient is over the age of 45 years old, is listed or eligible to be listed on the National Register of Historic places, or is located within a historic district, it must be submitted to the DOE for further review.

Award activities would primarily be completed at Autodesk Technology Center in Boston, MA. Panels would be

fabricated at this location. No physical modifications or changes to the use, mission, or operations would occur at this facility. Panel retrofit installations in the field would occur at three study sites (existing houses) in the Boston area. Installations would result in physical modifications to the study site buildings, as existing siding would be removed and replaced with the prefabricated panels. No ground disturbance or changes to the use, mission, or operations of existing facilities would occur. Building permits for panel installations at the study sites would be required.

Activities at the Autodesk Technology Center would involve the use and handling of various hazardous materials, including metals, epoxy, and industrial solvents. All hazardous materials at the facility would be handled and disposed of in accordance with federal, state, and local environmental regulations.

One of the study sites would involve the removal of existing cedar shingle siding, which could create dust and debris. Existing corporate health and safety policies and procedures would be followed, including employee training, proper protective equipment, and proper disposal procedures in line with state and federal requirements.

Activities at case study sites would potentially involve handling of lead-based paint found on existing architecture. Proper abatement procedures would be followed, and all contaminated material would be disposed of in an approved landfill following disposal procedures under federal, state, and local health, safety, and environmental regulations.

Minimal air emissions may result from the use of equipment during installation of panels in the field. However, significant air impacts are not anticipated as emissions would be temporary and intermittent.

DOE has considered the scale, duration, and nature of proposed activities to determine potential impacts on resources, including those of an ecological, historical, cultural, and socioeconomic nature. The Massachusetts Historical Commission determined that the proposed project would have “no adverse effect” on significant historic or archaeological properties at the two identified Case Study sites (1 and 2.) DOE does not anticipate any impacts to resources of concern due to the proposed award activities.

NEPA PROVISION

DOE has made a final NEPA determination.

Include the following condition in the financial assistance agreement:

Project installation activities for Case Study 3 are prohibited unless and until the following conditions have been met:

- 1) If the location selected by the Recipient is over 45 years of age, is listed or eligible to be listed on the National Register of Historic Places, or is located within a listed historic district, the Recipient must submit the proposed location to the DOE at GONEPA@ee.doe.gov;
- 2) If DOE determines it necessary, DOE completes Section 106 (National Historic Preservation Act) consultation for the location; and
- 3) The Recipient receives written authorization from the DOE to move forward with the activities stated above.

Notes:

Building Technologies Office (BTO)

This NEPA Determination requires legal review of the tailored NEPA provision.

NEPA review completed by Melissa Parker, 12/18/23

FOR CATEGORICAL EXCLUSION DETERMINATIONS

The proposed action (or the part of the proposal defined in the Rationale above) fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D. To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the

environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.

There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal.

The proposed action has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

The proposed action is categorically excluded from further NEPA review.

SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.

NEPA Compliance Officer Signature:  _____ Date: 12/18/2023
NEPA Compliance Officer

FIELD OFFICE MANAGER DETERMINATION

- Field Office Manager review not required
- Field Office Manager review required

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

Field Office Manager's Signature: _____ Date: _____
Field Office Manager