

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



RECIPIENT: Charlo School District

STATE: MT

PROJECT TITLE: Charlo School District - Junior High HVAC Upgrades and Energy Improvements

Funding Opportunity Announcement Number	Procurement Instrument Number	NEPA Control Number	CID Number
DE-FOA-002756	DE-SE0000724	GFO-SE0000724-001	

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.)
- B1.16 Asbestos removal** Removal of asbestos-containing materials from buildings in accordance with applicable requirements (such as 40 CFR part 61, "National Emission Standards for Hazardous Air Pollutants"; 40 CFR part 763, "Asbestos"; 29 CFR part 1910, subpart I, "Personal Protective Equipment"; and 29 CFR part 1926, "Safety and Health Regulations for Construction"; and appropriate state and local requirements, including certification of removal contractors and technicians).
- 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 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 replace the existing fuel oil boilers, fuel oil furnaces, and propane furnaces with a new energy efficient Heating, Ventilation, and Air Conditioning (HVAC) system in the Junior High School Charlo located on the Flathead Reservation in Charlo, MT. This funding opportunity is part of a DOE initiative to execute high impact energy efficiency and health improvements as well as innovative energy technology packages in K-12 schools across the country. Overall goals include addressing historic inequities in school facilities investments, reducing school energy expenditures, helping schools lead the nation in solving the climate crisis, and creating well-paying union jobs.

Award activities associated with this ND involve training, data analysis, preliminary engineering/design, modifications to an existing facility, and ground disturbing activities. All facility modifications and ground disturbing activities would occur at Charlo Junior High School. Ameresco, Inc. (Helena, MT) would be responsible for engineering/design activities as well as project and construction management.

The proposed HVAC upgrades at Charlo Junior High School would involve the installation of fourteen (14) air source heat pumps with associated housekeeping pads. These installations would occur outdoors immediately adjacent to the sides of the building. Thirteen (13) of these pads would be approximately sixteen (16) square feet each. The fourteenth pad (14), associated with the gym air source heat pump, would require approximately eighty (80) square feet of disturbance. There would be minor, temporary land disturbance adjacent to each pad for machinery work. The proposed electrical infrastructure to support the HVAC system would require a trench approximately three (3) feet deep by three (3) feet wide by 150 feet long in addition to a concrete pad mounted transformer that would require approximately thirty-six (36) square feet of disturbance. The electrical infrastructure would be placed within an existing paved area in between school buildings. Facility modifications are limited to those necessary for the installation of the new energy efficient HVAC system.

Award activities would involve typical hazards associated with construction and both mechanical and electrical work, including operation of potentially hazardous equipment and site-specific environmental hazards. One site-specific hazard could be disturbance of asbestos in the interior of the building. Currently, the portions of the building identified to contain asbestos are not planned to be disturbed. However, if this changes, mitigation would be performed by a certified asbestos abatement company and all federal, state, and local requirements would be followed. All activities would comply with existing federal, state, and local laws and regulations.

The Flathead Reservation is home to the Confederated Salish and Kootenai Tribes (CSKT). DOE completed consultation with the CSKT per Section 106 of the National Historic Preservation Act. DOE received concurrence from the CSKT Tribal Historic Preservation Officer on 1/25/2024 stating that "cultural resources will not be impacted."

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. DOE does not anticipate impacts on these resources which would be considered significant or require DOE to consult with other agencies or stakeholders aside from consultation that has already been mentioned.

## **NEPA PROVISION**

DOE has made a final NEPA determination.

Notes:

Office of State and Community Energy Programs – Renew America's Schools  
NEPA review completed by Corrin MacLuckie, 1/26/2024.

## **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:  Electronically Signed By: Andrew Montano Date: 1/26/2024  
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