

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



RECIPIENT: DuPage County

STATE: IL

PROJECT TITLE : Solar Panel Installation on Administration Building

Funding Opportunity Announcement Number	Procurement Instrument Number	NEPA Control Number	CID Number
DE-FOA0002882	DE-SE0000181	GFO-SE0000181-001	

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.)

B5.16 Solar photovoltaic systems

The installation, modification, operation, and removal of commercially available solar photovoltaic systems located on a building or other structure (such as rooftop, parking lot or facility, and mounted to signage, lighting, gates, or fences), or if located on land, generally comprising less than 10 acres within a previously disturbed or developed area. Covered actions would be in accordance with applicable requirements (such as local land use and zoning requirements) in the proposed project area and would incorporate appropriate control technologies and best management practices.

Rationale for determination:

The U.S. Department of Energy (DOE) is proposing to provide funding to DuPage County, Illinois (IL) to install a rooftop solar array at the County Department Headquarters Building in Wheaton, IL. This project would be funded under the Administrative and Legal Requirements Document (ALRD) for the DOE's Energy Efficiency Conservation Block Grant (EECBG) Program Formula Infrastructure Investment and Jobs Act.

DOE previously completed a NEPA Determination (ND; GFO-EECBG-2023-001) for EECBG Formula applicants under Statement of Work (SOW)-1 which included DuPage County. DuPage County revised their scope of work and now proposes to install a solar array that exceeds the maximum output put forth by their SOW. As a result, DuPage is requesting a separate DOE NEPA review of the solar array installation. All other activities proposed by DuPage County adhere to the restrictions and conditions of their SOW and are covered under the original ND (GFO-EECBG-2023-001). This ND covers solar array installation activities only.

Award activities would involve the installation of over 300 panels for a 253-kilowatt (kW) rooftop solar array at the County Department Headquarters Building. There is an existing 164-kW system that covers half of the roof, and the proposed project would be located on the remaining roof space. The roof would not require facility modifications or roof reinforcement. Cinderblocks would be used for the ballast racking system to weigh down the array and avoid the need for bolting the panels to the roof. There would be no ground disturbing activities. Trees would not be trimmed or cut, and trenching would not be required for conduits. The electrical lines would run from the array to an electrical room through ceilings and alongside walls which would be encased and not visible to the public or employees. The setup and staging would be within an existing loading dock area or section of road and a crane would be used to move materials to the roof.

The IPaC report generated September 12, 2024, lists seven species in the proposed project area: northern long-eared bat (*Myotis septentrionalis*), tricolored bat (*Perimyotis subflavus*), whooping crane (*Grus americana*), Hine's emerald dragonfly (*Somatochlora hineana*), monarch butterfly (*Danaus Plexippus*), eastern prairie fringed orchid (*Platanthera leucophaea*), and leafy prairie-clover (*Dalea foliosa*). There are no designated critical habitats at this location. The bald eagle (*Haliaeetus leucocephalus*) and several migratory bird species are identified as having a high likelihood of occurrence and breeding in the project area. However, the project would be contained to an existing structure and would not disturb nesting locations. Therefore, DOE has determined the proposed project would have no effect to threatened, endangered or candidate species in the area.

The building was built in 1970 and is three stories tall within a developed campus dating to the 19th century. The rooftop solar arrays would not be visible from the public right-of-way and the roof would not require reinforcement for

the installation. DuPage County shall adhere to the restrictions of the DOE-executed Historic Preservation Programmatic Agreement (PA) with the State of Illinois, available at <https://www.energy.gov/node/812599>. In the event an activity would not meet the exemptions identified within the PA, the county shall consult with the Illinois State Historic Preservation Office to obtain concurrence prior to project initiation.

Minimal air emissions may result from the use of diesel-powered vehicles during installation of the new equipment. However, significant air impacts are not anticipated as emissions would be temporary and intermittent. Hazards associated with the activities include working at elevated heights, with large machinery (crane), with electricity and electrical equipment, and with potential exposure to lead-based paint and asbestos. There is known asbestos in the ceiling of the building and hazardous material precautions would be followed. Existing government health, safety, and environmental policies and procedures would be followed, including personnel training, proper personal protective equipment, and engineering controls.

DuPage County would observe all applicable federal, state, and local health, safety, and environmental regulations and requirements. DOE does not anticipate any impacts to resources of concern due to proposed project activities.

NEPA PROVISION

DOE has made a final NEPA determination.

Include the following condition in the financial assistance agreement:

1. DuPage County must adhere to the terms and restrictions of the DOE-executed Historic Preservation Programmatic Agreement with the State of Illinois, available at <https://www.energy.gov/node/812599>.
2. DuPage County is responsible for reviewing the online NEPA and Historic Preservation training at www.energy.gov/node/4816816 and contacting EECBG.NEPA@ee.doe.gov with any EECBG NEPA or general historic preservation questions.
3. DuPage County is required to submit an annual Historic Preservation Report in the Performance and Accountability for Grants in Energy system (PAGE) located at <https://www.page.energy.gov/default.aspx>. If you have any questions about completing the annual Historic Preservation Report, please contact historicpreservation@ee.doe.gov and include your DOE Project Officer on the email.
4. DuPage County must acquire an inspection and approval from Commonwealth Edison as well as receive all applicable permits from the City of Wheaton, IL.

Notes:

Office of State and Community Energy Programs – EECBG
This NEPA determination requires legal review of the tailored NEPA provision.
NEPA review completed by Emily Cohen, 10/04/2024

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: Matthew Blevins Date: 10/8/2024
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