

PMC-ND  
(1.08.09.13)

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



**RECIPIENT:** P4P Energy LLC

**STATE:** CO

**PROJECT TITLE:** Highly Efficient Steel Cable Solar Photovoltaics Mounting System

Funding Opportunity Announcement Number	Procurement Instrument Number	NEPA Control Number	CID Number
DE-FOA-0001640	DE-EE0008136	GFO-0008136-003	GO8136

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.)
- B3.6 Small-scale research and development, laboratory operations, and pilot projects** Siting, construction, modification, operation, and decommissioning of facilities for smallscale research and development projects; conventional laboratory operations (such as preparation of chemical standards and sample analysis); and small-scale pilot projects (generally less than 2 years) frequently conducted to verify a concept before demonstration actions, provided that construction or modification would be within or contiguous to a previously disturbed or developed area (where active utilities and currently used roads are readily accessible). Not included in this category are demonstration actions, meaning actions that are undertaken at a scale to show whether a technology would be viable on a larger scale and suitable for commercial deployment.
- 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 P4P Energy LLC (P4P) to develop, optimize, and demonstrate a tensile solar parking canopy technology designed to reduce cost while maintaining structural integrity. Two previous NEPA Determinations were completed (GFO-0008136-001 and GFO-0008136-002), which together reviewed all project activities (CXs A9, B3.6, and B5.16).

Since that time, the site location associated with deployment of the solar installation developed as part of the project has been modified. Previously, deployment of a solar parking shade-canopy was to take place at an existing community center in Sacramento, CA. Deployment of this installation would no longer take place at this location, but rather, two installations would be deployed at separate locations in Chula Vista, CA and Tallahassee, FL. At each location (2800 Olympic Pkwy, Chula Vista, CA 91915 and 3840 N Monroe Street, Tallahassee, FL 32303), the canopy would be installed at existing, constructed parking lots that are adjacent to an athletic training center and shopping center, respectively.

The canopies would be assembled on-site from components fabricated to specification by qualified third-party manufacturers. Assembly of the installations would consist of mounting columns and anchors, installing cables, attaching photovoltaic (PV) panels to support structures, mounting panel supports, and connecting the solar PV panels to a battery bank or grid tied system. Additionally, geotechnical analysis would be performed at each of these locations prior to deployment. Installation activities would take approximately one month to complete.

Neither of these structures are located within a historic district or adjacent to any historic properties, nor are they eligible to be listed as a historic property. Because of this, in conjunction with the previously disturbed nature of the sites, their urban setting, and the short duration of construction activities, impacts are not expected to any cultural and/or natural resources of concern. The proposed outdoor demonstration would require an administrative Building Permit from each of the City/County in which work would be performed, as well as an interconnect permit if the system is interconnected to the existing grid. These permits would be obtained prior to beginning any construction activities.

Installation activities would involve work that can be hazardous in nature due to the use of power tools and electrified equipment. P4P would mitigate against any potential hazards by adhering to established health and safety practices and procedures. Personnel would be trained in safety protocols and would be required to use personal protective equipment. No hazardous, toxic, or explosive materials would be used. Site access would be limited to qualified personnel.

## NEPA PROVISION

DOE has made a final NEPA determination.

Notes:

Solar Energy Technologies Office

This NEPA determination does not require a tailored NEPA provision.

Review completed by Jonathan Hartman on 7/2/2019

## 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:



Kristin Kerwin

NEPA Compliance Officer

Date:

7/3/2019

## 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: \_\_\_\_\_  
Field Office Manager

Date: \_\_\_\_\_