

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



**RECIPIENT:** Winnett School District #1

**STATE:** MT

**PROJECT TITLE :** Winnett Public Schools Energy Upgrades Project

**Notice of Funding Opportunity Number**  
DE-FOA-0002756

**Procurement Instrument Number**  
DE-SE0000705

**NEPA Control Number**  
GFO-SE0000705-001

**CID Number**  
G0705

**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.)

**B2.1 Workplace enhancements**

Modifications within or contiguous to an existing structure, in a previously disturbed or developed area, to enhance workplace habitability (including, but not limited to, installation or improvements to lighting, radiation shielding, or heating/ventilating/air conditioning and its instrumentation, and noise reduction).

**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.

**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).

**Rationale for determination:**

The U.S. Department of Energy (DOE) is proposing to provide funding to Winnett School District #1 (hereinafter "Winnett") to perform energy efficiency upgrades to their K-12 school, the Winnett School, in Winnett, 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.

DOE previously completed one NEPA Determination (GFO-SE0002756-BP1; A9 and A11; 11/30/2023) that covered Budget Period (BP) 1 activities for 18 school districts under the Energy Improvements at Public K-12 School Facilities Funding Opportunity Announcement (DE-FOA-0002756). Winnett was included in GFO-SE0002756-BP1 and is now seeking a NEPA review for the remaining award activities, i.e., BP2.

Energy efficiency upgrades at the Winnett School includes the demolition and removal of the existing coal and fuel oil boilers within the boiler building. The boiler building would be thoroughly cleaned once the existing boilers are removed and prior to the installation of three high-efficiency propane boilers. Fueling the propane boilers would require the installation of four above ground, 1,000-gallon propane tanks and one electric vaporizer. The propane tanks would be located on school grounds directly south of the main school building and east of a shop in an existing graveled area. Installation would require a concrete pad and result in approximately 600 square feet of ground disturbance. Electric and fuel piping would run underground from the tanks to the boiler building and require a trench approximately 30 feet long by 1 foot wide by 3 feet deep. Approximately 50 feet of sidewalk would be removed and approximately 100 feet of new sidewalk would be laid to connect the existing sidewalk to the boiler building. Lastly, direct digital controls would be installed throughout the school to automate the new system.

Award activities would involve typical hazards associated with construction, including the handling and use of hazardous materials, operation of potentially hazardous equipment and vehicles, and site-specific environmental hazards. To mitigate risk, only licensed and trained electricians, contractors, plumbers, and pipefitters would be employed. Additionally, only licensed demolition contractors who would comply with all federal and state disposal and safety regulations, including Occupational Safety and Health Administration (OSHA) regulations, would be employed. The propane tanks would be located and installed according to all applicable codes, including the National Fire Protection Association 58 standard. Due to the age of the school building, a National Emission Standards for Hazardous Air Pollutants Asbestos Impact Inspection was performed and determined that asbestos abatement is necessary. Specifically, abatement of the boiler components and drywall in the janitor's closet related to the fan coil mounting is required. Asbestos abatement must be completed by an OSHA competent person who is also accredited by the Montana Department of Environmental Quality (DEQ) Asbestos Control Program. Abatement activities require Environmental Protection Agency/Montana DEQ notification, an appropriately applied for permit, and at least 10 days' notice prior to the start of abatement activities. Existing health, safety, and environmental policies and procedures would be followed to mitigate hazards to acceptable levels. Mitigated hazards would pose negligible risks to the public and environment. All activities would comply with existing federal, state, and local laws and regulations.

The U.S. Fish and Wildlife Service's Information for Planning and Consultation (IPaC) website identifies one species, the Monarch Butterfly, that may occur in the project area. The Monarch Butterfly prefers woodland edges where milkweeds are prevalent. All outdoor installation activities would occur on school grounds, away from forested areas, in areas that are currently graveled. Therefore, it is unlikely that this species would be present in the project area. Additionally, no critical habitat has been designated for this species. DOE has determined there would be no effect on federally listed threatened, endangered, or candidate species. Further, DOE does not anticipate adverse impacts to migratory bird species.

Under DOE's executed Historic Preservation Programmatic Agreement (PA) with the state of Montana, Winnett consulted with the Montana State Historic Preservation Office (SHPO). Winnett received a response on 11/29/2024 stating that "as long as there will be no disturbance or alteration to structures over fifty years of age, we concur that there will be no historic properties affected by this undertaking." The SHPO response also stated that the ground disturbing activities meet the definition of "minimal" ground disturbance as outlined in the PA. Per Section XIV(c) of the DOE-executed Prototype PA, DOE requires that Winnett submit an annual historic preservation report summarizing all award undertakings and reviews occurring from September 1st through August 31st. These reports are due to DOE annually and are to be received no later than September 15th.

DOE is required to consider floodplain management and wetland protection as part of its environmental review process (10 CFR 1022). No National Wetlands Inventory wetlands were identified in the project area. A search of the project area on the Flood Emergency Management Act (FEMA) Flood Map Service Center indicated that FEMA has not completed a study to determine flood hazard for the location. Therefore, Winnett must contact their state floodplain manager to determine if the project area is in a flood prone area that would require a permit.

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 what is mentioned above.

DOE has made a final NEPA determination.

Include the following condition in the financial assistance agreement:

To adhere to Section 106 of the National Historic Preservation Act requirements, no disturbance or alteration to structures over fifty years of age can occur. If such activities are deemed necessary, consultation with the Montana State Historic Preservation Office (SHPO) must be reinitiated and your DOE Project Officer and DOE NEPA Specialist must be notified before the associated work can start.

Winnett School District #1 is required to submit an annual historic preservation report on the MS Forms website summarizing all award undertakings and SHPO reviews occurring from September 1st through August 31st. These reports are due to DOE annually no later than September 15th. Please contact your DOE Project Officer for the link to the online form. If you have any questions about completing the annual historic preservation report, please contact [historicpreservation@ee.doe.gov](mailto:historicpreservation@ee.doe.gov) and include your DOE Project Officer on the email.

Per 10 CFR 1022, DOE is required to consider floodplain management as part of its environmental review process. A search of the project area on the Flood Emergency Management Act (FEMA) Flood Map Service Center indicated that FEMA has not completed a study to determine flood hazard for the location. Therefore, Winnett must contact their state floodplain manager to determine if the project area is in a flood prone area that would require a permit.

Asbestos abatement must be completed by an Occupational Safety and Health Administration competent person who is also accredited by the Montana Department of Environmental Quality (DEQ) Asbestos Control Program. Abatement activities require Environmental Protection Agency/Montana DEQ notification, an appropriately applied for permit, and at least 10 days' notice prior to the start of abatement activities.

Winnett School District #1 is required to obtain all necessary permits, including mechanical, boiler, and electrical permits from state of Montana for the new propane boilers and controls.

Notes:

Office of State and Community Energy Programs – Renew America's Schools  
This NEPA determination requires legal review of the tailored NEPA provision.  
NEPA review completed by Corrin MacLuckie, 12/10/2024.

## **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

NEPA Compliance Officer

Date: 12/10/2024

**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: \_\_\_\_\_