

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



**RECIPIENT:** Township of Lower Merion

**STATE:** PA

**PROJECT TITLE :** Penn Wynne Library Solar Photovoltaic Installation

**Notice of Funding Opportunity Number**  
DE-FOA-002882

**Procurement Instrument Number**  
EECEQ-00658

**NEPA Control Number**  
GFO-LowerMerionPA-001

**CID Number**

**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.)

**B1.15 Support buildings**

Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6, and B6.10 of this appendix.

**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 the Township of Lower Merion, Pennsylvania to install rooftop and carport solar photovoltaic (PV) arrays at the Penn Wynne Library and adjacent parking lot, respectively, in Wynnewood, Pennsylvania. This project would be funded under the Administrative and Legal Requirements Document (ALRD) for the Energy Efficiency Conservation Block Grant (EECBG) Program Formula Infrastructure Investment and Jobs Act.

Award activities would involve the installation of a maximum of 156.6-kilowatts (kW) rooftop solar PV array at the Penn Wynne Library and three carports in the adjacent municipal Manoa Road parking lot. The library was built in 1949, and several additions and updates have been made, the latest in 2015. The rooftop installation would involve a 33.2-kW solar PV array on the approximately 1,660 gross square foot 2015 addition and include approximately 60 solar panels. The 2015 roof would not require facility modifications or roof reinforcement, and the PV module racking system would be attached with penetrations through the existing shingled roof.

The carports in the adjacent parking lot would consist of three elevated structures with foundations to support a 123-kW solar PV system consisting of 239 panels. Construction of the carports would require the installation of steel columns which would involve ground disturbance to a depth of approximately three feet. Electrical conduit would run aboveground to the end of the carport closest to the library building. From this carport, trenching would be required to run the electrical conduit underground to the library, measuring 90 feet in length and three feet deep. All ground disturbance would be within the existing parking lot and regularly maintained lawn area.

The U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) report was run on

September 23, 2024, and three listed species were identified as potentially occurring in the project area: Indiana bat (*Myotis sodalis*), tricolored bat (*Perimyotis subflavus*), and Monarch butterfly (*Danaus plexippus*). There are no critical habitats identified within the project area. 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. Both sites are in urban settings that are already paved, routinely maintained, or regularly mowed. The Pennsylvania Department of Conservation and Natural Resources works with the USFWS to review project impacts using the Pennsylvania Natural Diversity Inventory (PNDI). The Township of Lower Merion submitted project information for review and received a letter indicating “No Known Impacts” and “No Further Coordination required”. Therefore, DOE has determined the proposed project would have no effect to threatened, endangered, or candidate species in the area.

The Township of Lower Merion consulted with the Pennsylvania State Historic Preservation Office (SHPO) per their DOE-executed Historic Preservation Programmatic Agreement. The Pennsylvania SHPO responded on October 11, 2024, stating no effect to above ground historic properties or archaeological resources. However, if during project activities the Township of Lower Merion or their contractors encounter any cultural materials (i.e. historic or prehistoric) or human remains, all activities must cease in the vicinity of the discovery immediately. The recipient must inform the Pennsylvania SHPO, the DOE Project Officer, and other appropriate authorities of the discovery so that an evaluation can be completed prior to continuing work.

Minimal air emissions may result from vehicles and equipment that would be used to install the rooftop and carport solar PV arrays, but emissions would be temporary and intermittent. Hazards associated with the activities include working at elevated heights, with large machinery (i.e., crane), and with electricity and electrical equipment. Existing government health, safety, and environmental policies and procedures would be followed, including personnel training, proper personal protective equipment, and engineering controls.

The Township of Lower Merion 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 the proposed activities of the project.

## NEPA PROVISION

DOE has made a final NEPA determination.

Include the following condition in the financial assistance agreement:

1. The Township of Lower Merion must adhere to the terms and restrictions of the DOE-executed Historic Preservation Programmatic Agreement with the State of Pennsylvania, available at <https://www.energy.gov/node/812599>.
2. If during project activities the Township of Lower Merion or their contractors encounter any cultural materials (i.e. historic or prehistoric) or human remains, all activities must cease in the vicinity of the discovery immediately. The recipient must inform the Pennsylvania SHPO, the DOE Project Officer, and other appropriate authorities of the discovery so that an evaluation can be completed prior to continuing work.
3. The Township of Lower Merion is responsible for reviewing the online NEPA and Historic Preservation training at [www.energy.gov/node/4816816](http://www.energy.gov/node/4816816) and contacting [EECBG.NEPA@ee.doe.gov](mailto:EECBG.NEPA@ee.doe.gov) with any EECBG NEPA or general historic preservation questions. Please make sure to copy your DOE Project Officer on the email.
4. The Township of Lower Merion is required to submit an annual historic preservation report on the MS Forms website. 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.
5. Lower Merion must acquire an interconnection agreement with PECO, the local utility provider, as well as receive all applicable permits from the municipality for installation of the solar PV array.

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, 12/9/24

## 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: \_\_\_\_\_



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: \_\_\_\_\_