

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



**RECIPIENT:** Allegheny County

**STATE:** PA

**PROJECT TITLE :** EECBG Program – County of Allegheny

**Notice of Funding Opportunity Number**  
DE-FOA-0002882

**Procurement Instrument Number**  
DE-SE0000205

**NEPA Control Number**  
GFO-SE0000205-001

**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.)

**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); 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.

## **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).

### **Rationale for determination:**

The U.S. Department of Energy (DOE) is proposing to provide funding to Allegheny County to install new electrical services and upgrade existing lighting at the County's fleet maintenance building at the South Side Garage in Pittsburgh, PA. This project would be funded under the Administrative and Legal Requirements Document (ALRD) for the Energy Efficiency Conservation Block Grant (EECBG) Program.

Project activities would involve minor physical modifications to the South Side Garage building, including installing new electrical services. The electrical upgrades would be completed by the utility company at the front of the building impacting the building's façade. Two front windows would be replaced with wall material, in which the new electrical service would be attached. An electrical contractor would replace all current electrical wiring, panel boxes, and breakers, as well as the installation of grounding rods. Additionally, all current lighting fixtures would be upgraded.

Four grounding rods, each 10 feet long and 5/8 inches wide, would be directly imbedded at two locations: the front right and the rear right of the garage. Two grounding rods would be installed in the ground at each location, approximately 6 to 10 feet apart with #2 copper conductor between them. The ground rods and associated equipment would be buried in a ground box so that the area would remain level, and no equipment or structures would be exposed above grade. The installation of the grounding rods would involve a maximum ground disturbance of 300 square feet in existing pavement.

The ground wiring would be bonded to the frame of the building in multiple locations. To ensure proper grounding throughout the facility, a grounding conductor would be installed on the East and West walls of the building. The building columns are mostly masonry covered which would need to be cleaned off, the grounding connections attached, and then the covering restored. The connections to the ground loop are in addition to the grounding rods and the ground loop would be bonded to the ground rods. Any other grounded system in the building would be bonded to the new ground system as required by the National Electric Code. There would be no change to the use of the facility from project activities.

The proposed project site is not located in any designated wetland area. Based on the Federal Emergency Management Agency National Flood Hazard Map data accessed on October 8th, 2024; the proposed project would be located within a special flood hazard area (SFHA). No changes to the landscape itself are planned. Additionally, construction notes state that existing contours must be maintained. Therefore, project activities in the flood hazard area would not have the potential to impact the floodplain itself. DOE has determined that providing funding in support of this project is not a floodplain action requiring a floodplain assessment under 10 CFR 1022. However, since construction would be occurring in a SFHA, a floodplain permit must be obtained from the local floodplain administrator before project activities are initiated.

The U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) report, generated October 10th, 2024, identifies two endangered species. These include the endangered Indiana bat (*Myotis sodalis*) and the proposed endangered tricolored bat (*Perimyotis subflavus*), which may occur in the vicinity of the proposed project. No critical habitats are identified within the proposed project area. The bald eagle (*Haliaeetus leucocephalus*) and several migratory bird species are identified as likely occurring and breeding in the vicinity of the project area. However, the project would be contained to existing structures, would not disturb nesting locations, and does not require any tree removal or trimming. The project area is in an already disturbed, urbanized area, and does not provide suitable habitat for these species. Therefore, DOE has determined that the proposed project would have no effect on threatened, endangered, proposed, or candidate species in the area.

The proposed project location was constructed in the late 1950's but is not listed on the National Register for Historic Places and is not located within a historic district. The recipient consulted with the Pennsylvania State Historic Preservation Office and received concurrence of "No Effect" on potential above ground or archeological resources within the project area.

Minimal air emissions may result from the use of diesel-powered vehicles and equipment during the lighting upgrade and ground rod installment. Potential emissions from this project would primarily be produced during the construction phase and would be associated with stationary sources such as construction vehicles and equipment. Currently, Allegheny County fully meets the National Ambient Air Quality Standards and has recently submitted the SO<sub>2</sub> Redesignation Request and Maintenance Plan to the Pennsylvania Department of Environmental Protection for approval. 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, and with electricity and electrical equipment. All workers, including contracted workers, would follow standard safety protocols during the construction phase of the project. As any new health or safety risks are identified, new policies and procedures would be implemented. Existing government and corporate health, safety, and environmental policies and procedures would be followed, including personnel training, proper personal protective equipment, monitoring, and internal assessments. All workers, including contracted workers, would follow standard safety protocol during the construction phase of this project.

The Allegheny 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 the proposed activities of the project.

EERE is aware of the November 12, 2024, decision in *Marin Audubon Society v. FAA*, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality (CEQ) regulations implementing NEPA are not judicially enforceable or binding on this agency action, EERE has nonetheless elected to follow those regulations at 40 C.F.R. Parts 1500-1508, in addition to DOE's procedures/regulations implementing NEPA at 10 C.F.R. Part 1021, to meet the agency's obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

## NEPA PROVISION

DOE has made a final NEPA determination.

Include the following condition in the financial assistance agreement:

1. Allegheny County 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. Allegheny County is responsible for reviewing the online NEPA and Historic Preservation training at [www.energy.gov/node/4816816](https://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.
3. Allegheny County is required to submit an annual historic preservation report in the Performance and Accountability for Grants in Energy (PAGE) system 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](mailto:historicpreservation@ee.doe.gov) and include your DOE Project Officer on the email.
4. If during project activities Allegheny County or their contractors encounter any cultural materials (i.e. historic or prehistoric), all activities must cease in the vicinity of the discovery immediately. The recipient must inform the Pennsylvania State Historic Preservation Office and the DOE Project Officer of the discovery so that an evaluation of the discovery can be completed prior to continuing work.
5. The entire project is within a Special Flood Hazard Area as defined by the Federal Emergency Management Agency. Therefore, a floodplain permit MUST be obtained from the local floodplain administrator before project activities are initiated.

Notes:

Office of State and Community Energy Programs – EECBG  
This NEPA determination requires legal review of the tailored NEPA provision  
NEPA review completed by Jennifer Ryan, 3/31/2025

## 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: 4/2/2025

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