

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



RECIPIENT: [The School Board of the City of Richmond, a.k.a. Richmond Public Schools \(RPS\)](#) **STATE:** [VA](#)

PROJECT TITLE : [Renew RPS 2024!](#)

Notice of Funding Opportunity Number
[DE-FOA-0003325](#)

Procurement Instrument Number
[DE-SE0001446](#)

NEPA Control Number
[GFO-SE0001446-001](#)

CID Number
[GO1446](#)

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:

**[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); 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.

Rationale for determination:

The U.S. Department of Energy (DOE) is proposing to provide funding to Richmond Public Schools to perform energy efficiency upgrades at 22 schools in Richmond, Virginia. 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.

DOE previously completed a NEPA Determination (ND; GFO-FY24 Renew Schools-001; A9 and A11; 11/30/2023) that covered Phase 1 and 2 activities for up to 23 schools and school facilities demonstrating a need for energy improvements. Phase 1 activities included the subject schools identifying their project teams, assembling the proposed portfolio of school activities, and demonstrating the need for energy improvements. Phase 2 activities included data analysis, feasibility studies, conceptual designs, and energy audits.

Activities under the current Phase 3 review include implementing the energy improvements proposed under Phases 1 and 2. These activities include upgrading lighting, retro-commissioning of existing HVAC systems, window replacements that include asbestos removal, and building automation control upgrades at various schools. Project activities would occur at the following schools: Amelia Street School, Albert Hill Middle School, Armstrong High School, Barack Obama Elementary School, Bellevue Elementary School, Dogwood Middle School, Elizabeth D. Redd Elementary School, Fairfield Court Elementary School, Franklin Military Academy, G.H. Reid Elementary School, George W. Carver Elementary School, J.L. Francis Elementary School, John Marshall High School, Maymont Preschool, Richmond Success Academy, Richmond Community High School, Southampton Elementary School,

Summer Hill Preschool, Swansboro Elementary School, Thomas Jefferson High School, Westover Hills Elementary School, Frances W. McClenney Elementary School.

Formal consultation with the Virginia Department of Historic Resources (VA DHR) was initiated by the recipient, with a VA DHR responses provided on December 17th, 2025. The email from the VA DHR stated that it was their opinion that the historic properties within the Area of Potential Effects would not be adversely affected by the proposed undertaking. The VA DHR consultation response concluded by stating that if the scope of the undertaking changes or if the undertaking cannot be completed as proposed in the application submitted and reviewed by the VA DHR, that their offices should be contacted for guidance on reinitiating consultation under Section 106.

Wetland and waterway areas would be avoided during field activities and no impacts to aquatic resources, including floodplains, are expected through project implementation.

The proposed project activities include LED lighting fixture retrofits, retro-commissioning of HVAC systems, and replacement of existing direct digital HVAC controls. These activities present typical construction-related safety hazards such as working at heights (e.g., using ladders or lifts), exposure to electrical components, minor excavation and trenching for conduit runs, and the temporary use of construction materials including adhesives, wiring, and low-VOC sealants. During window replacement activities, all hazardous materials, including asbestos, would be properly encapsulated and air quality monitoring during demolition of the existing windows would occur. The recipient would adhere to all applicable federal, state, and local health, safety, and environmental regulations.

Any changes to the project activities or locations are subject to additional NEPA review by DOE and are not authorized for federal funding unless and until the Contracting Officer provides written authorization on those additions or modifications. Any and all permits required for the execution of the project at the above-referenced locations would be the responsibility of the recipient.

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 further with other agencies or stakeholders.

NEPA PROVISION

DOE has made a final NEPA determination.

Include the following condition in the financial assistance agreement:

1- The SHPO found that no adverse effect on historic properties would occur through project implementation. However, if the scope of the undertaking changes or if the undertaking cannot be completed as proposed in the application submitted and reviewed by the VA DHR, their offices should be contacted for guidance on reinitiating consultation under Section 106.

2- Richmond Public Schools 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 and include your DOE Project Officer on the email.

3- Any changes to the project activities or locations are subject to additional NEPA review by DOE and are not authorized for federal funding unless and until the Contracting Officer provides written authorization on those additions or modifications.

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 Chris Akios, 6/2/2025

FOR CATEGORICAL EXCLUSION DETERMINATIONS

The proposal fits within a class of actions that is listed in Appendix B to 10 CFR Part 1021 or Appendix B and C of DOE's NEPA Implementing Procedures (June 30, 2025). To fit within the classes of actions listed in Appendix B to 10CFR Part 1021, or Appendix B of DOE's NEPA Implementing Procedures, a proposal must satisfy the conditions that are integral elements of the classes of actions in Appendix B of both 10 CFR Part 1021 and DOE's NEPA Implementing Procedures.

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.

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: **Nicole Serio**

NEPA Compliance Officer

Date: 6/2/2026

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: _____