

PMC-ND
(1.08.09.13)

**U.S. DEPARTMENT OF ENERGY
OFFICE OF CRITICAL MINERALS AND ENERGY INNOVATION
NEPA DETERMINATION**

RECIPIENT: [Region Five Development Commsission](#)

STATE: [MN](#)

PROJECT TITLE : [Improving Performance, Reducing Cost at Cass Lake-Bena Public Schools on Leech Lake
Band of Ojibwe Reservation](#)

Notice of Funding Opportunity Number
[DE-FOA_0002756](#)

Procurement Instrument Number
[DE-SE0000709](#)

NEPA Control Number
[GFO-SE0000709-001](#)

CID Number
[GO709](#)

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 the Region Five Development Commission for energy efficiency upgrades at three different school buildings (Cass Lake-Bena Elementary, Middle, and High Schools) in Cass Lake, Minnesota. This funding opportunity is part of DOE's Renew America's Schools Program which funds 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-SE0002756-BP1; A9 and A11; 11/30/2023) that covered Budget Period 1 (BP1) activities for 18 school districts, including the Cass Lake-Bena School District, under the Energy Improvement at Public K-12 School Facilities Funding Opportunity Announcement (DE-FOA-0002756).

This NEPA review is for the remaining project activities, Budget 2, during which the proposed upgrades would be made. Consultation with the THPO was completed for the projects with a finding of no adverse effects on historic properties and full support for the projects. DOE has completed its consultation responsibilities under Section 106 of the National Historic Preservation Act.

Proposed upgrades at the three schools would include some or all of the following activities:

- HVAC replacements including new air handling units and new variable air volume boxes
- Digital building controls and electrical switchboard upgrades



- Lighting upgrade to light emitting diode (LED) in buildings and parking lots
- Electronically commutated motor (ECM) replacements
- Kitchen freezer/cooler refrigeration equipment replaced with high efficiency models
- Boiler Replacements
- Ventilation and dehumidification replacements
- Chiller replacement
- Window replacements

Ground disturbing activities would occur only at Cass Lake-Bena Elementary and in previously disturbed areas. A new concrete pad would be laid down, and trenching would be performed for the installation of the chiller on an area of an existing asphalt parking lot. Two existing wooden light poles would be replaced with new poles that can hold LED fixtures.

Activities of the proposed project include the installation of HVAC systems, boilers, air-cooled condensers, chillers, LED lighting, sensors and controls, windows, and freezer/cooler refrigeration equipment. The activities present typical construction-related safety hazards such as slips, trips, and falls; exposure to electrical components; minor excavation and trenching for conduit runs; confined/limited access mechanical rooms; and the use of construction materials including adhesives, wiring, and low-VOC sealants. The recipient would adhere to all applicable federal, state, and local health, safety, and environmental regulations.

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:

Per Section XIV(c) of the Programmatic Agreement, DOE requires that Region Five Development Commission 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 for the life of the award and are to be received no later than September 15th each year.

Notes:

Office of State and Community Energy Programs – Renew America's Schools
NEPA review completed by Shaina Aguilar on 8/26/26.

FOR CATEGORICAL EXCLUSION DETERMINATIONS

The proposed action (or the part of the proposal defined in the 'Rationale for Determination' above) 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.

To fit within the classes of actions listed in Appendix B to 10 CFR Part 1021 or Appendix B of DOE's NEPA Implementing Procedures, 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 Appendix B to 10 CFR Part 1021; (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 Appendix B to 10 CFR Part 1021.



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, is not related to other actions with individually insignificant but cumulatively significant impacts and is not precluded by applicable regulations or procedures 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: **Kristin Kerwin**
NEPA Compliance Officer

Date: 8/28/2026

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: _____

