

# DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

## SECTION A. Project Title: Priority 4 Roads Mowing

## SECTION B. Project Description and Purpose:

Facility and Site Services (F&SS) proposes to mow certain two-track roads (priority 4) to mitigate for potential wildland fire dangers stemming from security patrols near the ATR complex.

The vegetation on T-2 has grown exponentially with the wet spring. Vehicle engines can easily ignite dry or fine fuels such as those that grow in the center strip and along the edge of 2-track roads. Mowing activities will be limited to the width of the existing footprint of the identified roads (see below). Proposed activities will be time-limited to the CY 2023 wildland fire season. Additional mowing activities for two-track roads on the INL site will require additional NEPA analysis.

Please note that mowing within the existing footprint of priority 1-3 roads is described in INL- 20-007 and its accompanying DOE CX determination. Any mowing activities on priority 1-3 roads should adhere to the bounding conditions established in that document.

The roads proposed for mowing are as follows:

- T-2 from the ATR Complex to Highway 20
- Trout St.
- ATR Perimeter Road
- TRA Emergency Access Roads
- Unnamed Road extending East from Trout St. to Lincoln Blvd.
- Unnamed Road Extending Northeast from northern-most pond to Lincoln Blvd.
- Outer canal Road (see green feature in map)



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**SECTION C. Environmental Aspects or Potential Sources of Impact:**

**Air Emissions**

Mowing may generate fugitive dust.

**Discharging to Surface-, Storm-, or Ground Water**

NA

**Disturbing Cultural or Biological Resources**

There is the potential for this work to impact vegetation and for project personnel to interact with various wildlife species. A Biological Resource Review will be arranged within two weeks prior to the initiation of any activities that might disturb soil or vegetation and again following completion of project activities. A nesting bird survey is included with the Biological Resource Review for actions occurring between April 1 - October 1 per compliance with the Migratory Bird Treaty Act. Bat surveys are also included with the Biological Resource Review in accordance with the INL Bat Protection Plan.

Pursuant to the 2023 Programmatic Agreement, this federal undertaking is excluded from Section 106 review as the proposed activity has little to no potential to cause effects to historic properties.

**Generating and Managing Waste**

NA

**Releasing Contaminants**

When chemicals are used during the project there is the potential for spills that could impact the environment (air, water, soil).

**Using, Reusing, and Conserving Natural Resources**

NA

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**SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification:** Identify the applicable categorical exclusion from 10 Code of Federal Regulation (CFR) 1021, Appendix B, give the appropriate justification, and the approval date.

For Categorical Exclusions (CXs), the proposed action must not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, or similar requirements of Department of Energy (DOE) or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment or facilities; (3) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources (see 10 CFR 1021). In addition, no extraordinary circumstances related to the proposal exist that would affect the significance of the action. In addition, the action is not "connected" to other action actions (40 CFR 1508.25(a)(1) and is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1608.27(b)(7)).

**References:**

B1.3 "Routine maintenance"

**Justification:**

B1.3 Routine maintenance. Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:(a)Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses;(b)Door and window repair or replacement;(c)Wall, ceiling, or floor repair or replacement;(d)Reroofing;(e)Plumbing, electrical utility, lighting, and telephone service repair or replacement;(f)Routine replacement of high efficiency particulate air filters;(g)Inspection and/or treatment of currently installed utility poles;(h)Repair of road embankments;(i)Repair or replacement of fire protection sprinkler systems;(j)Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces;(k)Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation);(l)Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;(m)Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor;(n)Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes);(o)Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and(p)Removal of debris.

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)       Yes     No

Approved by Jason L. Anderson, DOE-ID NEPA Compliance Officer on: 8/9/2023