

SECTION A. Project Title: Maintaining Roads on the INL Site

SECTION B. Project Description and Purpose:

The Idaho National Laboratory Site has a multitude of roads and rights-of-way (ROW) including highways, rail lines, paved roads, pedestrian walkways, graveled roads, and two-track roads. These roads and ROWs span across the 890 square mile site and require ongoing maintenance to remain passable and safe. The roads are used for a myriad of mission-critical activities including the safety and security of INL site personnel. Activities described in this scope are needed to support normal and emergency access and egress, wildland fire management activities, security patrols, and access to power distribution infrastructure.

This ECP analyzes the routine maintenance of roads and ROWs on the INL site and establishes the bounding conditions which all activities must adhere to be covered under the accompanying DOE NEPA CX Determination document DOE-ID-INL-23-108. Any projects requiring actions that fall outside these conditions will require additional NEPA analysis. Should additional analysis be required, INL environmental staff and DOE will determine the appropriate level of NEPA coverage. Routine road maintenance activities are any activities required to maintain and preserve roads, pathways, rails, or rights of way in a condition suitable to be used for their designated purposes.

Activities covered under this document include the corrective, preventative, and predictive maintenance and miscellaneous services for roads, ROWs, railroads, and pathways on the INL site and select off-site roads. These activities include but are not limited to:

I) Repairs to road embankments

II) Resurfacing of roads and/or parking lots with in-kind materials including:

- a) Construction of temporary access to facilitate resurfacing
- b) Scraping and/or grading of unpaved graveled roads
- c) Spot graveling to maintain accessibility

III) Construction, acquisition, and relocation of:

- a) Pedestrian walkways and trails
- b) Bicycle paths
- c) Small outdoor fitness areas
- d) Short access roads and rail lines (less than 0.5 miles)

IV) Traffic flow adjustments to existing roads including but not limited to:

- a) Placement of signage
- b) Installation of a traffic light
- c) Adjusting direction of traffic flow
- d) Adding turning lanes

V) Road adjustments to existing roads including but not limited to:

- a) Widening (limited to 10% widening for a maximum combined road distance of 0.5 miles of road)
- b) Realignment (0.5 miles or under)

VI) Vegetation removal and mowing within the existing footprint of rails, roads, pathways, or ROWs.

VII) Snow removal activities on INL roads including, but not limited to:

- a) Use of front loaders or graders to remove snow within the existing footprint of graveled or paved INL roads and rail lines.
- b) Use of snow blowers or augurs to remove snow from the existing footprint of graveled or paved roads, rail lines, pathways, and ROWs.
- c) Use of hand tools to remove snow from INL pathways, graveled and paved roads, rail lines, and ROWs.
- d) Use of front loaders, graders, snowblowers, augurs, or hand tools to remove snow from two-track roads if the roads need cleared for safety or security-related reasons.

VIII) Removal of wind-blown sand or sediment within the footprint of an existing road that substantially impedes access for post-fire recovery actions or monitoring activities. Wind-blown sand or sediment can be removed using front loaders, graders, or hand equipment such as shovels.

All proposed actions described in this document and covered under the accompanying DOE Categorical Exclusion Determination Document also include reasonably foreseeable actions necessary to implement the activities described. This could include but is not limited to personnel, equipment, and material staging, exploratory digging, managing temporary dirt/debris piles, placement of temporary sanitary facilities, and placing

temporary support structures.

Activities that do not fall within the bounding conditions of the ECP and the referenced DOE regulations, must receive separate NEPA analysis to determine coverage.

Routine maintenance covered in this document does **NOT** include:

- Replacement of major components that significantly extend the expected useful life of a road, right of way, rail line, or pathway
- Activities that result in a significant change to the design capacity or function of a road, right of way, pathway, or rail line
- The construction of new roads, rail lines, pathways, or rights of way over 0.5 miles for short access roads or rail lines. (see Item III a)
- Vegetation removal outside the existing footprint of a road, right of way, pathway, or rail lines
- Any maintenance activity that does not comply with local laws, INL policies and procedures, or DOE policies and regulations.
- Upgrading a two-track road to a graveled road that is graded.
- Upgrading a graveled road to a paved road
- Removal of snow from two-track roads for any reason that is not related to security or safety

Note: Construction, acquisition, relocation, and adjustment of paths, rails, and roads must be consistent with applicable right-of-way conditions, approved land use and transportation plans, and existing DOE and INL plans and procedures to be covered under this ECP.

Note: Resurfacing must be in-kind work. (e.g. graveled roads must be re-surfaced with gravel)

Note: Maintenance or construction of temporary project access roads are not intended to be covered by this tent ECP.

All activities covered under this document must be entered into the Environmental Review Process electronic workflow to determine NEPA coverage. During this process, these activities will be screened by the INL Cultural Resource Management Office to determine if a Cultural Resource Review (CRR) is needed. Hold Points and Project Specific instructions will be provided to project managers prior to beginning work.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project activities have the potential to release ozone depleting substances and greenhouse gases.

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.

Cultural: All activities covered under this tent ECP must be separately entered into the Environmental Review Process electronic workflow and reviewed individually to determine if a Cultural Resource Review (CRR) is needed. The CRMO will define an Area of Potential Effects and assess effects of the undertaking to historic properties. If it is found that there are potential adverse effects to historic properties, it will require consultation with Idaho State Historic Preservation Office (SHPO), Advisory Council of Historic Preservation (ACHP), Shoshone-Bannock Tribes, Interested Parties, and the public and will add to the project timeline. Hold Points and Project Specific instructions will be provided to project managers prior to beginning work.

Generating and Managing Waste

When wastes are generated, how they are disposed can adversely affect the environment. Managing wastes appropriately and responsibly and implementing recycling or reuse practices, where feasible, during project activities can reduce the potential impact on the environment.

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

Project description indicates materials will need to be purchased or used that require sourcing materials from the environment. Being conscientious about the types of materials used could reduce the impact to our natural resources.

Environmental Justice

According to the CEQ Climate and Economic Justice Screening Tool, the INL site as well as the Research and Education Campus in Idaho Falls, ID are located in U.S. Census tracts that are identified as disadvantaged communities. Census tracts identified as disadvantaged meet or exceed socioeconomic, environmental, health, or demographic thresholds identified by CEQ. Given that activities analyzed in this document will happen within the boundaries of existing DOE/INL land and/or facilities where there are no permanent residents, any impacts to Environmental Justice in surrounding communities are anticipated to be negligible.

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", B1.13 "Pathways, short access roads, and rail lines", B1.32 "Traffic flow adjustments"

Justification: B1.3 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.

B1.13 Construction, acquisition, and relocation, consistent with applicable right-of-way conditions and approved land use or transportation improvement plans, of pedestrian walkways and trails, bicycle paths, small outdoor fitness areas, and short access roads and rail lines (such as branch and spur lines).

B1.32 Traffic flow adjustments to existing roads (including, but not limited to, stop sign or traffic light installation, adjusting direction of traffic flow,

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and adding turning lanes), and road adjustments (including, but not limited to, widening and realignment) that are within an existing right-of-way and consistent with approved land use or transportation improvement plans.

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

Approved by Robert Douglas Herzog, DOE-ID NEPA Compliance Officer on: 1/30/2024