

## **Department of Energy**

Western Area Power Administration P.O. Box 281213 Lakewood, CO 80228-8213

## MEMORANDUM FOR FILE

FROM: Sonja Anderson ANDERSON

Sierra Nevada Regional Manager ANDERSON

Digitally signed by SONJA ANDERSON Date: 2021.05.05 13:17:41

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SUBJECT: Supplement Analysis to the Final Environmental Assessment for

Sacramento Valley Right-of-Way Maintenance Program

Western Area Power Administration (WAPA), Sierra Nevada Region, is preparing a Supplement Analysis (SA) that is a review of the Final Environmental Assessment (EA) for Right-of-Way (ROW) Maintenance in the Sacramento Valley, California (DOE/EA-1395), dated August 2005. This SA has been prepared in accordance with the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Recommendations for the Supplement Analysis Process (§1021.330). In accordance with the policy, all DOE organizations are required to evaluate sitewide NEPA documents every five years, including site-wide EAs, to determine whether the EA remains adequate, or whether to prepare a new EA or Supplemental EA. This SA provides an analysis of the original Proposed Action and whether any substantial changes in environmental impacts, or new circumstances or information relevant to environmental concerns, might have a bearing on the Proposed Action.

This evaluation requires identifying required updates to meet changes in maintenance operations, identifying new environmental regulations that impact the operations, and determining whether the existing EA continues to satisfactorily meet NEPA requirements, or whether changes have occurred in the Proposed Action or environmental regulations that are substantial enough to trigger a supplemental EA.

The 2005 EA analyzed the potential environmental consequences of the proposed Sacramento Valley Right-of-Way Maintenance Project, as required under the National Environmental Policy Act (NEPA), and other relevant Federal regulations. The Sacramento Valley Program is an ongoing operations and maintenance (O&M) project. Routine O&M activities include, but are not limited to, facility inspection/repair (e.g., ground and area patrols, replacement of equipment within the confines of the existing fenced substation or facility perimeter, insulator maintenance), vegetation management (e.g., manual control, mechanical control), equipment upgrades (e.g., reconductoring, tower replacement), and maintenance and improvement of access roads.

One of the major purposes of preparing the August 2005 Final EA for the Sacramento Valley Program was to consolidate all the ongoing and routine O&M activities in the Sierra Nevada's Sacramento Valley into one comprehensive and programmatic environmental analysis. This was necessary to appropriately and efficiently address NEPA requirements, and to minimize the

potential need to develop separate NEPA documentation when a routine O&M activity is undertaken.

The analysis in this SA indicates that the identified and projected environmental impacts of the Proposed Action would not be significantly different from those analyzed in the Final EA. Standard Operating Procedures (SOPs) and Project Conservation Measures (PCMs) were incorporated into the Proposed Action to avoid and minimize potential environmental effects. Changes to the project area and activities are not significant and are in the same vicinity and habitats as the other sites and require the same O&M activities, facility upgrades, and inspections and repairs as described in the Final EA. Additional tasks and features were added to the list of equipment to operate and maintain; however, these features and associated inspection and O&M would be similar to previous activities analyzed in the Final EA. Updates were made to the air quality analysis and general conformity analysis and regulations and biological resources species lists. Revised PCMS were required to be added for the biological species revisions. There would not be increased project-related affects for any resource area since the analysis conducted in the Final EA.

In accordance with my responsibilities under Section 3.b of the Department of Energy Policy 451.1, NEPA Compliance Program, I have determined that it is appropriate to prepare this SA to the Final EA for ROW Maintenance in the Sacramento Valley. Beth Kelly will be the NEPA Document Manager for the SA and may be reached at (209) 429-7607.

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