# Floodplain Statement of Findings
# for the
# Electrical Power Capacity Upgrade Project,
# Los Alamos National Laboratory
# Los Alamos County, New Mexico

**AGENCY**: U.S. Department of Energy (DOE) National Nuclear Security Administration (NNSA), Los Alamos Field Office

**ACTION**: Floodplain Statement of Findings

**DESCRIPTION Of THE PROPOSED ACTION**: The National Nuclear Security Administration (NNSA), a semi-autonomous agency within the U.S. Department of Energy (DOE), is proposing new construction at Los Alamos National Laboratory (LANL). The Electrical Power Capacity Upgrade (EPCU) Project would provide a permanent electrical upgrade for LANL, including poles with guy and anchor wires for overhead power lines, and electrical substation and switchgear upgrades. The proposed project would cross through DOE lands managed by LANL, Santa Fe National Forest, and the Bureau of Land Management (Figure 1). This floodplain assessment addresses only the DOE segment of the proposed project. Other agencies are required to meet their specific policies and procedures regarding floodplains.

The floodplain assessment was prepared in accordance with DOE regulations set forth in Title 10 Code of Federal Regulations (CFR) Part 1022 (10 CFR 1022), *Compliance with Floodplain and Wetland Environmental Review Requirements*, and complies with the regulations that were current at the time of publication. The need for a floodplain assessment was determined as the project refined scope and specific locations were identified. Public meetings are not a requirement of 10 CFR 1022 which is a separate process from National Environmental Policy Act (NEPA) 42 U.S.C. § 4321 *et seq.*; 10 CFR Part 1021; and the DOE Implementing Procedures.

**LOCATION WITHIN A FLOODPLAIN EXPLANATION:** Few of the activities in this proposed project are associated with floodplains. Power lines would pass overhead of floodplains in TwoMile, Sandia, Los Alamos, Mortandad, Ten Site, Water and Canada del Buey Canyons. Project activities proposed within the Sandia Canyon 100-year floodplain include one temporary materials laydown area. Project activities proposed within the Fence Canyon 100-year floodplain and include: (1) upgrades to the existing Technical Area 71 (TA-71) Southern Technical Area (STA) Substation, (2) a temporary materials and equipment laydown area, (3) installation of power poles with guy wires and anchors, and (4) a section of road maintenance. Fence Canyon has no inflow from other canyons above or at the proposed project location. No storage structures or other structures with capacity for storage are proposed as part of this project. The scope of the project does not include storage of highly volatile, toxic, or water reactive materials, hazardous waste, or other materials or actions that would increase hazards to human safety, health and welfare within the floodplain. Therefore, this project did not meet the 10 CFR 1022 definition of a “critical action”, and the 100-year floodplain was appropriate for this analysis despite historic records on frequency or intensity of precipitation.

**ALTERNATIVES:**
Triad analyzed proposed project alternatives in more detail including potential impacts to wildlife and existing infrastructure in an environmental assessment specifically written for the EPCU project (DOE/EA-2199). The EA was completed and published on the DOE NEPA website. The no-action alternative would not provide a reliable or redundant transmission line for LANL and Los Alamos County for their respective operations. More frequent and longer-duration outages would be expected due to extensive maintenance problems with existing lines and shortages in the regional power supply.

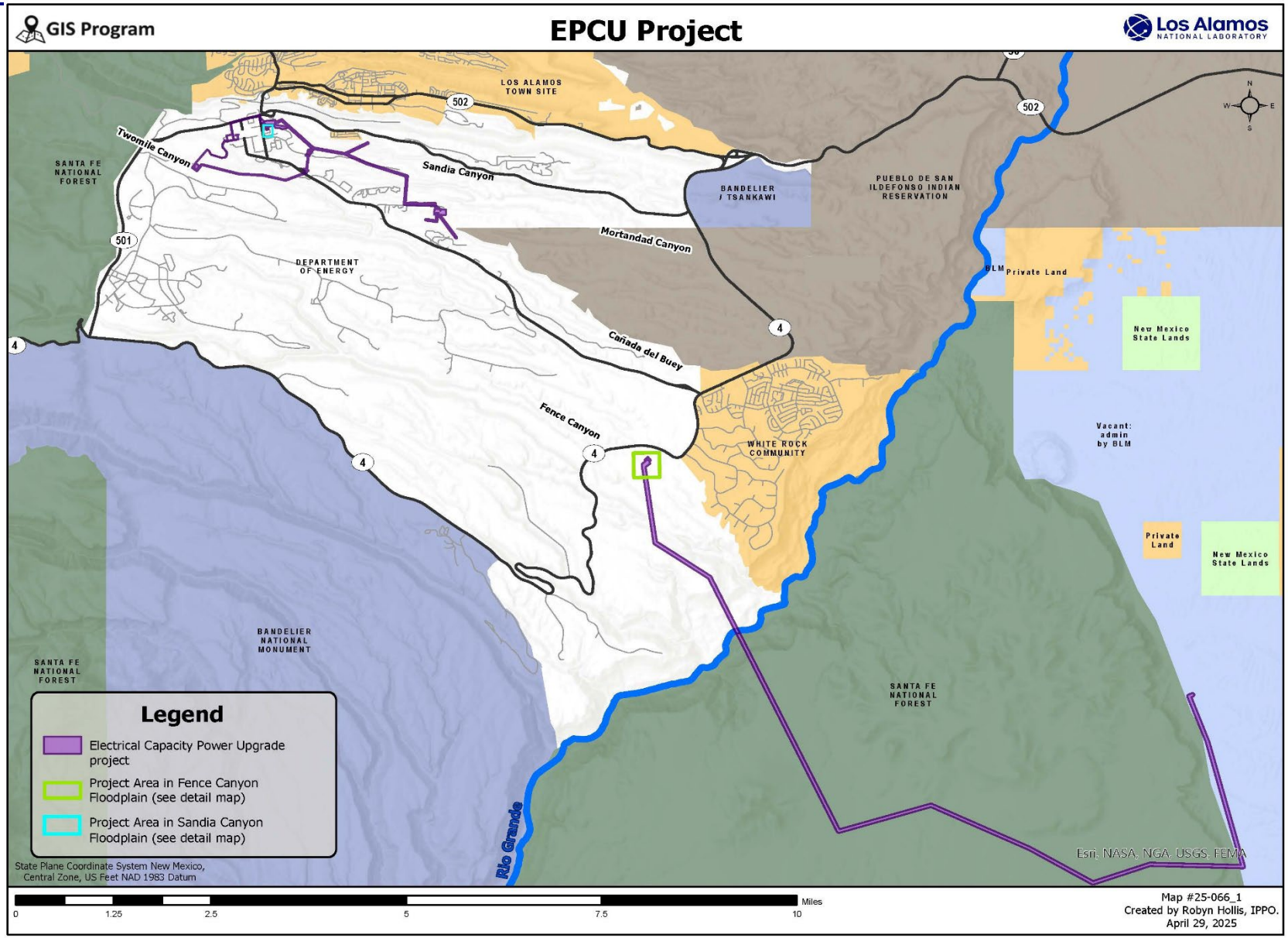


Figure 1. Location of proposed EPCU project

The alternatives of reconductoring existing transmission lines, expanding onsite power generation (e.g., small nuclear reactor, wind, solar, gas turbine), and new transmission line alternatives (e.g., alternate transmission line routes, underground transmission lines) did not meet project evaluation criteria to address the need to increase electrical transmission capacity and performance. These alternatives raised concerns with social and economic impacts of power failures, increased cultural and environmental impacts, and increases in project length and cost.

**FLOODPLAIN PROTECTION STANDARDS:** The proposed project would result in limited and minor direct and indirect impacts to 100-year floodplains on DOE lands and would not result in adverse impacts to floodplain values or functions. The proposed project also would not change the flood hazard rating. The construction activities are temporary and short-term disturbance within the floodplains. Disturbance would cease following completion of construction activities. No long-term impacts are expected. The proposed project would implement stormwater controls and best management practices to mitigate impacts during construction. This proposed project would not significantly modify flow paths within the floodplains from pre-project conditions to post-project conditions. No effects are anticipated to lives or property from work within the floodplain related to EPCU activities.

**STEPS TO BE TAKEN TO MINIMIZE POTENTIAL HARM TO OR WITHIN THE FLOODPLAIN:** Potential short-term direct and indirect floodplain impacts from release of pollutants to the floodplain and exposure to stormwater would be avoided or minimized through implementation of the following:

- The project must coordinate with LANL Biological Recourses personnel for Mexican spotted owl habitat. The project must comply with the project-specific biological assessment requirements, noise and light protection standards, and habitat protection.
- The Migratory Bird Treaty Act prohibits killing migratory birds, including nestlings and eggs in an active nest. If the project requires vegetation removal during the nesting season (May 15 through July 15), LANL Biological Resources subject matter experts would conduct an onsite inspection for bird nests. Construction activities would conform to requirements stipulated in the Migratory Bird Best Management Practices Source Document for LANL.
- The project must work with LANL Cultural Resources to route project construction activity around cultural resources and must follow the LANL procedure for inadvertent discoveries.
- Equipment would be refueled at least 100 feet from floodplains.
- The project is required to have coverage under the current nationwide EPA NPDES 2022 National Pollution Discharge Elimination System Construction General Permit (CGP). Appropriate industry standard stormwater controls and best management practices must be implemented, installed and maintained per manufacturer guidance to reduce erosion and sediment transport, manage run-on and runoff, contain excavated materials, and keep potential pollutants within the work site limits and away from potential stormwater flow during construction. Spill prevention and clean up are specific requirements in the CGP.
- Hazardous materials, chemicals, fuels, and oils would not be stored within floodplains.
- The proposed project is not expected to mobilize legacy contamination or add contamination from normal operations. Unplanned releases/spills from abnormal operations would be addressed with specific requirements in the LANL Spill Prevention, Control and Countermeasure program and the CGP.
- After construction activities are completed, all disturbed areas must have final stabilization in accordance with the LANL Seeding Specification. Any vegetation stabilization will use the LANL Seeding Specification mix which contains native perennial grass, forb and shrub species and pollinator plant species. Native species selection benefits pollinator species, suppresses weeds, and restores natural habitats ensuring long-term ecological stability.

- The project is subject to requirements regarding the Energy Independence and Security Act, Section 438. The project must coordinate with LANL Stormwater personnel to design appropriate controls for each project area to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the area.
- In accordance with U.S. Army Corps of Engineers regulations, a Clean Water Act Section 404 dredge-and-fill permit or New Mexico State Section 401 Water Quality Certification would not be required for this project provided the proposed project will not temporarily stage or leave vegetation, soils, or equipment within the watercourse and does not push soils into the watercourse. (Note: The watercourse is the channel through which water normally flows. The 100-year floodplain is the lowlands adjoining inland waters and relatively flat areas that have a 1% chance of being flooded in any given year.)
- The project must coordinate with LANL Consent Order personnel to identify Areas of Concern (AOC) or Solid Waste Management Units (SWMU) before construction begins and avoid disturbance, if possible. If the project cannot avoid disturbance, any material excavated within an AOC/SWMU boundary must be managed within that boundary, returned to the point of origin, and stabilized using LANL-approved best management practices. Any material that cannot be managed on-site must be managed, characterized, and disposed of in accordance with LANL waste management policies, procedures, and associated documents.
- Existing environmental sampling data is required to be publicly accessible through the Intellus website (http://www.intellusnm.com). Project activities as described in the floodplain assessment do not trigger additional sampling by Triad, LLC.

**SUPPLEMENTARY INFORMATION**:
A Floodplain Statement of Findings was prepared in accordance with Executive Order 11988, *Floodplain Management* and DOE implementing current regulations 10 CFR 1022. A summary of the analysis and determination for the *Floodplain Assessment for the Electrical Power Capacity Upgrade* (Floodplain Assessment) is provided herein the Statement of Findings.

The notification for the availability of the Floodplain Assessment and request for comments was sent to appropriate government agencies, tribes, organizations, and persons known to be interested in or potentially affected by the proposed floodplain action via the GovDelivery system and published online on July 23, 2025, for a 15-day public review and comment period on the DOE National Environmental Policy Act (NEPA) website at https://www.energy.gov/nepa/articles/los-alamos-national-laboratory-floodplain-assessment-installation-permanent-power-ta.

Two sets of comments were received. One comment received supported the No Action alternative as described in the floodplain assessment. After the close of the public comment period and before issuing a floodplain statement of findings, DOE/NNSA reevaluated the practicability of alternatives to the proposed floodplain action and the mitigating measures, taking into account all substantive comments received during the public comment period. Some of the comments received were determined to be outside the scope of this document.

**FOR FURTHER INFORMATION ON THIS STATEMENT OF FINDINGS CONTACT:** For further information or questions regarding this Floodplain Statement of Findings contact Ms. Karen Armijo via email at karen.armijo@nnsa.doe.gov; fax (505) 667-5948 or mail to Ms. Karen Armijo, NNSA Los Alamos Field Office, 3747 West Jemez Road, Los Alamos, NM 87544.