



**Department of Energy**  
Western Area Power Administration  
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MEMORANDUM FOR FILE

FROM: Sonja Anderson  
Sierra Nevada Regional Manager **SONJA ANDERSON**

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ANDERSON  
Date: 2021.05.05 13:16:05  
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SUBJECT: Supplement Analysis to the Final Environmental Assessment for North Area 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 North Area Right-of-Way (ROW) Maintenance Program (DOE-EA-1539), dated June 2010. 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 substantial changes in environmental impacts, or significant new circumstances or information relevant to environmental concerns, that 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 2010 EA analyzed the potential environmental consequences of the proposed North Area ROW Maintenance Program, as required under the National Environmental Policy Act (NEPA), and other relevant Federal regulations. The North Area Maintenance 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. All O&M activities addressed in the June 2010 Final EA are conducted within the existing and approved boundaries of the North Area Program transmission line ROW, legally deeded access roads, and communication and substation facilities. Western prepared a Final EA and Finding of No Significant Impact (FONSI) for the North Area Program in June 2010.

One of the major purposes of preparing the Final EA for the North Area Maintenance Program was to consolidate all the ongoing and routine O&M activities in the Sierra Nevada's North Area 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 be no 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 North Area ROW Maintenance Program. Beth Kelly will be the NEPA Document Manager for the SA and may be reached at (209) 429-7607.

bcc:

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