



**Department of Energy**  
Western Area Power Administration  
P.O. Box 281213  
Lakewood, CO 80228-8213

MEMORANDUM FOR FILE

FROM:

Sonja Anderson

**SONJA**

Sierra Nevada Regional Manager **ANDERSON**

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ANDERSON  
Date: 2021.05.05 13:19:20  
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SUBJECT:

Supplement Analysis to the Final Environmental Assessment for Right-of-Way Maintenance in the San Joaquin Valley

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 San Joaquin Valley, California, DOE/EA-1697, dated December 2011. 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 any 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 2011 EA analyzed the potential environmental consequences of the proposed San Joaquin Valley Right-of-Way Maintenance Project, as required under the National Environmental Policy Act (NEPA), and other relevant Federal regulations. WAPA's San Joaquin Valley ROW Maintenance Program updated the previous O&M Program in the Sierra Nevada's San Joaquin Valley area to include all transmission lines, associated legal access roads, substations, and the maintenance facility into one comprehensive Master O&M Program, which included additional maintenance activities and use of herbicides in some areas.

The 2011 EA also provided information for Endangered Species Act (ESA) and National Historic Preservation Act (NHPA) consultation processes required for the additional maintenance activities. Subsequent to the publication of the Draft EA, WAPA reinitiated Section 7 consultation and received concurrence with the United States Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration National Marine Fisheries

Service (NMFS) to include the San Joaquin Valley ROW O&M Program in the programmatic informal consultation on the North Area ROW O&M Project. Pursuant to Section 106 of the NHPA, WAPA has a Programmatic Agreement (PA) with the California State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) for existing routine O&M and emergency activities, including O&M and emergency activities along WAPA's ROWs, including access roads and substations.

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. Revisions included updating the list of sites and transmission lines covered within the same vicinity and habitats and requiring the same O&M activities. 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 ROW Maintenance in the San Joaquin Valley. Beth Kelly will be the NEPA Document Manager for the SA and may be reached at (209) 429-7607.

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S. Anderson, N0000, Folsom, CA

L. Saare, N1800, Folsom, CA