



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

EXECUTIVE OFFICE

OCT 09 2015

In reply refer to: A-7

MEMORANDUM FOR ELLIOT E. MAINZER, ADMINISTRATOR and CHIEF EXECUTIVE OFFICER,
BONNEVILLE POWER ADMINISTRATION

THROUGH:

CLAUDIA R. ANDREWS *Claudia R. Andrews*
CHIEF OPERATING OFFICER, BONNEVILLE POWER ADMINISTRATION

THOMAS A. MCDONALD *Tom*
CHIEF COMPLIANCE OFFICER, COMPLIANCE AND GOVERNANCE (ACTING),
BONNEVILLE POWER ADMINISTRATION

FROM:

DAVID KENNEDY *DK*
ENVIRONMENTAL PLANNING AND ANALYSIS (ACTING),
BONNEVILLE POWER ADMINISTRATION

SUBJECT:

DIRECTIVES EQUIVALENCY APPROVAL MEMORANDUM

PURPOSE: To document BPA's equivalency of Department of Energy Order 451.1B, National Environmental Policy Act (NEPA) Compliance Program

BACKGROUND: NEPA responsibilities are described in the NEPA statute, implementing regulations from the Council on Environmental Quality, and DOE NEPA regulations. DOE Order 451.1B provides further requirements and responsibilities for DOE units "to ensure efficient and effective implementation of DOE's NEPA responsibilities through teamwork," particularly in coordination with the Office of General Counsel, and that DOE elements "control the cost and time for the NEPA process while maintaining its quality."

JUSTIFICATION: BPA implements NEPA compliance in a manner equivalent to Order 451.1B. BPA utilizes NEPA Compliance Officers and NEPA Document Managers, in coordination with the BPA Office of General Counsel, to ensure a team-oriented approach to implementing NEPA responsibilities for BPA actions, and to ensure consistent and high quality NEPA work, equivalent to sections 4 and 5 of the Order.


BPA's NEPA compliance program is built on a framework including BPA's Basic Environmental Policies and Responsibilities (BPAM 900), BPA's Environmental Management System (BPAM 902), which includes the use of the balanced scorecard system (BSC), and the Environmental Planning and Analysis (KEC) Handbook. The Environment, Fish and Wildlife organization uses several standard BSC elements to track and monitor on-going significant NEPA projects to assure they are cost-effective and timely, and to assess and adapt mitigation effectiveness. The adequacy of BPA's NEPA compliance program in meeting the intent of Order 451.1B is reflected in the numerous delegations to the BPA Administrator dating back to the early 1990s authorizing BPA to issue most Environmental Impact Statements/Records of Decision, and Environmental Assessments/Findings of No Significance with BPA review and oversight (see attached).

To assure visibility and transparency department-wide, BPA continues to maintain close communication with the DOE Office of NEPA Policy and Compliance, and reports to that office the following, consistent with the Order, which BPA will continue to do:

- (1) Report monthly on the status of NEPA documents BPA has in preparation.
- (2) Provide information to allow the Office of NEPA Policy and Compliance to link draft and final EAs and EISs from BPA's NEPA website to the Department's NEPA website.
- (3) Report on lessons learned after completing an EIS or EA.
- (4) Contribute to the Department's Lesson's learned quarterly report when appropriate.
- (5) Participate in the national NEPA Compliance Officers coordination calls.
- (6) Submit an annual NEPA planning summary.

RECOMMENDATION: Recommend that you approve this equivalency memorandum.

Elliot E. Mainzer, Administrator and Chief Executive Officer, Bonneville Power Administration

APPROVE:  DISAPPROVE: _____ DATE: 10/9/15

CONCURRENCES/ CONSULTATIONS: Carol Borgstrom, Director, DOE Office of NEPA Policy and Compliance.

cc:

Skila Harris

Senior Advisor, Power Marketing Administration, Department of Energy