

United States Government

Department of Energy  
Bonneville Power Administration

# memorandum

DATE: January 23, 2012

REPLY TO  
ATTN OF: KEC-4

SUBJECT: Supplement Analysis for the Resource Programs Environmental Impact Statement (DOE/EIS-0162/SA-01)

TO: Mark Johnson – KLJC-1  
Public Utilities Specialist

## **Background:**

This Supplement Analysis (SA) for the Bonneville Power Administration (BPA) Resource Programs Final Environmental Impact Statement (RP FEIS) (DOE/EIS-0162, February 1993) was prepared to review whether BPA's proposed adoption of revised residential weatherization specifications represents a significant change from the consideration of such specifications in the RP FEIS such that a supplemental or new EIS should be prepared. Under U.S. Department of Energy (DOE) National Environmental Policy Act (NEPA) regulations (10 C.F.R. § 1021.314(c)), DOE departmental elements such as BPA may prepare an SA to assist the agency in determining whether there is a need for a supplemental or new EIS. Pursuant to the regulations, the two factors considered in a SA for making this determination are: 1) whether there are substantial changes in an EIS's proposed action that are relevant to environmental concerns; or 2) whether there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. The consideration of these factors informs BPA's determination of whether the agency needs to prepare a supplemental or new EIS, or whether no further NEPA documentation is required.

## **Description of the Proposed Action:**

BPA proposes to adopt revised weatherization specifications for existing residential (retro-fit) weatherization for electrically heated single family homes, manufactured homes, and multi-family buildings that are three floors or fewer above grade. These weatherization specifications consolidate, revise, and replace all previous residential weatherization specifications established by the Northwest Power and Conservation Council's Regional Technical Forum (RTF). New requirements in the revised residential weatherization specifications include:

- Whole House Mechanical Ventilation Compliance for retro-fitted homes where air sealing is installed as a program measure. Air sealing as a program measure includes a pre and post blower door test, and a measurement of building tightness;
- Inspections by utility inspectors or representatives of a minimum 25% of projects to verify and document compliance with the revised specifications; and
- Distribution of informational materials detailing the effects of weatherization on indoor air quality to homes where weatherization measures have been installed.

## **Analysis:**

The development and implementation of residential weatherization specifications is part of BPA's residential sector energy conservation programs previously analyzed in the RP FEIS. These programs were included as part of the Emphasize Conservation Alternative in the RP EIS, which was the alternative adopted by the BPA Administrator in the Resources Programs Record of Decision (RP ROD, April 1993). The RP FEIS also incorporated by reference the analyses and most of the

mitigation measures from the Expanded Residential Weatherization Program Final EIS (DOE/EIS-0095, August 1984) and New Energy Efficient Homes Programs Final EIS (DOE/EIS-0127, August 1998).

As discussed in the RP EIS, residential weatherization measures increase energy efficiency primarily by tightening the building envelope through installation of insulation and other “house tightening” measures. In general, there are little to no environmental effects associated with conservation measures such as weatherization (RP ROD, Figure 1). However, there can be concerns about impacts related to indoor air quality since the decreased ventilation resulting from weatherization can have the side effect of increasing concentrations of already-existing indoor air pollutants in homes being weatherized.

BPA’s proposed action of adopting the revised weatherization specifications will not result in substantial changes from the RP FEIS because the revisions do not markedly change existing residential energy conservation programs or their impacts. BPA’s current proposed action is limited to revising the existing residential weatherization specifications to match industry standards that have evolved due to technological advances. Furthermore, these revisions involve changes to requirements for activities such as testing, monitoring, and information distribution, which have only negligible, if any, environmental effect. In addition, the environmental impacts to indoor air quality of alternatives in the RP FEIS utilizing weatherization measures were adequately analyzed in Section 3.1.2 (“Residential Sector Conservation”), and the analysis of this issue in the RP FEIS continues to be valid. Strategies identified and incorporated into the RP FEIS continue to be effective in mitigating these impacts. Therefore, because the analysis of impacts and the continuation of mitigation strategies in the RP FEIS encompass the proposed revisions to residential weatherization specifications, these proposed revisions are not a substantial change from the proposed action considered in the RP FEIS and adopted in the RP ROD.

In addition, there are no significant new circumstances or information relevant to environmental concerns and bearing on the proposed action because the environmental impacts of weatherization analyzed in the RP FEIS remain unchanged since its completion. While the proposed revisions in weatherization specifications relate to environmental concerns such as impacts to air quality, these impacts were considered in the RP FEIS. As described above, Section 3.1.2 contains analysis of the impacts to indoor air quality from energy conservation measures such as weatherization and mitigation strategies that operate to address such impacts. Given that the changes in specifications involve primarily testing, monitoring, and information distribution requirements, these changes are not expected to result in seriously different impacts from what was considered in the RP FEIS. Therefore, no significant new circumstances or information relevant to environmental concerns have arisen since publication of the RP FEIS because it fully accounts for the environmental impacts of proposed revisions to weatherization specifications.

**Findings:**

This Supplement Analysis finds that: 1) there are no substantial changes in the proposed action that are relevant to environmental concerns; and 2) there are no significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts, within the meaning of 10 C.F.R. § 1021.314(c)(1) and 40 C.F.R. §1502.9(c). Therefore, preparation of a supplemental or new EIS is not required.

*/s/ Jeffrey J. Maslow*  
Jeffrey J. Maslow  
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Concur: */s/ Rick Yarde* \_\_\_\_\_  
Rick Yarde  
Acting NEPA Compliance Officer

Date: *January 23, 2012*