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Determination of NEPA Adequacy (DNA)
American Recovery and Reinvestment Act Project: Viewpoint Trail Resurface
Campbell Airstrip Trailhead Parking Area Resurfacing

DOI-BLM-AK-A010-2010-0014-DNA

Location:
T. 12 N., R. 3 W., Sec. 3, Seward Meridian
Campbell Tract, Anchorage, Alaska

Prepared By:
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DETERMINATION OF NEPA ADEQUACY WORKSHEET

U.S. Department of Interior
Bureau of Land Management
Anchorage Field Office

OFFICE: Anchorage Field Office

TRACKING NUMBER: DOI-BLM-AK-A010-2010-0014-DNA

CASEFILE/PROJECT NUMBER: n/a

PROPOSED ACTION TITLE/TYPE: Aggregate Resurfacing of Viewpoint Trail and Campbell Airstrip Trailhead Parking Lot

LOCATION/LEGAL DESCRIPTION: T. 12 N., R. 3 W., Sec. 3, Seward Meridian, Anchorage, AK

APPLICANT: Bureau of Land Management

A. Description of the Proposed Action and any applicable mitigation measures

PROPOSED ACTION

The Anchorage Field Office proposes resurfacing of approximately 4,500 feet of Viewpoint Trail as well as the entire Campbell Airstrip Trailhead Parking Lot, including entrance and exit roads.

See Exhibit A: Trail Contract Scope of Work, for details on the trail existing condition, trail construction proposed, project work specifications, and project mitigations. Completion of this project would improve the trail condition to enhance user safety, user satisfaction, and decrease erosion.

The Campbell Airstrip Trailhead Parking Lot would be resurfaced with an average of six inches of aggregate, or approximately 500 ton, to resurface both the entrance and exit access roads in addition the parking area. Aggregate for the parking lot project would be delivered and stockpiled at the parking lot. The parking lot resurfacing would be completed by BLM Facilities Maintenance employees.

The existing parking area surface is compacted gravel. There are low-lying sections of the parking area that pool water and rut badly during spring break up conditions. A raised parking area surface in addition to some ditching and culvert installation would decrease the rutting and associated erosion problems. New aggregate would be spread and compacted on top of the existing older aggregate. The parking area footprint size would not increase. Resurfacing of the parking area and access roads would be within the existing footprint or already hardened area.

TRAIL RESURFACING CONTRACT MITIGATION MEASURES

General mitigation measures, to prevent resource impacts, are listed below. Exhibit A, the contract Statement of Work, provides more detail regarding *how* these mitigation measures will be achieved and enforced by the Contracting Officer's Representative (COR).

- Excavation and restoration of trail ditches to reduce erosion and facilitate drainage away from the trail by removing rocks, roots, and sticks to make ditches clear and free draining.

- The contractor must prepare seedbeds and furnish and place required seed, fertilizer, and mulch on machinery-impacted areas outside the 96" finished trail tread as well as those areas designated as vehicle turnarounds.

- Placement of native debris (PND) is required to prevent off-trail traffic and to protect newly seeded areas.

- Work may begin as soon as aggregate stockpile is available and trail conditions allow. Work must be completed no later than September 15, 2010.

- The contractor shall access project work using the Campbell Creek Science Center Spur Trail, located east of the Campbell Creek Science Center (see Exhibit B map).

- The contractor shall use hauling and spreading equipment sized appropriately to the trail in order to minimize rutting and impacts to surrounding vegetation.

- All tools, vehicles, and transport equipment used must be thoroughly cleaned prior to moving equipment across or onto BLM managed lands to prevent the spread of invasive weeds. .

- All contract work crews shall meet with the COR and/or Invasive Weeds Specialist prior to beginning work to develop mitigation measures to prevent spread of invasive plants.

PARKING LOT RESURFACING MITIGATION MEASURES

General mitigation measures, to prevent resource impacts, are listed below for the project using BLM employees and equipment.

- BLM excavation and restoration of parking lot ditches as well as installation of culverts will be used to reduce erosion and facilitate drainage away from the parking area and nearby stream by removing rocks, roots, and sticks to make ditches clear and free draining.

- BLM will prepare seedbeds and furnish and place required seed, fertilizer, and mulch on machinery-impacted areas outside the parking lot footprint.

- If within 60 days prior to initiation of parking lot resurfacing, BLM heavy equipment was removed from BLM Campbell Tract Lands, then the equipment used must be thoroughly cleaned prior to beginning work. Cleaning requirements would be the same for BLM equipment as listed in the attached Exhibit A, contract Statement of Work.

B. Land Use Plan Conformance

The area within which the Proposed Action would take place is covered by the following Land Use Plan:

Ring of Fire Record of Decision and Approved Management Plan – Anchorage Field Office, Alaska, dated March 2008.

The Ring of Fire Record of Decision (BLM, 2008, pg.10), directs management of the Campbell Tract Facility SRMA to continue to be guided by *A Management Plan for Public Use and Resource Management on the Bureau of Land Management Campbell Tract Facility* (1988), and any future amendments to this plan.

C. Other applicable NEPA documents

The proposed trail resurfacing project is considered "corrective maintenance," which includes drainage and trail hardening, consistent with the trail maintenance guidelines in the Environmental Analysis, *Management Plan for Public Use and Resource Management on the Bureau of Land Management Campbell Tract Facility* (June, 1988, pg. 43).

Part IV: The Management Program
B. Recreation Management Actions
5. Action RM-5: Trail Maintenance
a) Perform routine maintenance annually
b) Perform corrective maintenance as necessary, including drainage and trail hardening. Complete a corrective maintenance survey and update as needed.

The proposed parking lot resurfacing project is considered "trailhead access improvement," which includes improving trailhead access and parking, also consistent with the trailhead access guidelines in the Environmental Analysis, *Management Plan for Public Use and Resource Management on the Bureau of Land Management Campbell Tract Facility* (BLM 1988, pg. 41).

Part IV: The Management Program
B. Recreation Management Actions
2. Action RM-2: Trailhead Access
a) Manage the existing Campbell Airstrip Road access point as the primary access to the east side of the tract. Expand the Campbell Airstrip Road parking area to approximately twice its current size by extending the area to the south, provided there is no significant impact to the creek environment or wetlands.

There are no additional applicable National Environmental Policy Act (NEPA) documents, or other related documents that cover the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, monitoring report, etc.).

D. NEPA adequacy Criteria

1) Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

The new proposed trail resurfacing action is corrective trail maintenance, very typical of annual maintenance that occurs on Campbell Tract Trails with BLM and BLM-supervised youth crews each season. This project is funded by the American Recovery and Reinvestment Act (ARRA), which requires recent National Environmental Policy Act (NEPA) review and the creation of more job opportunities, such as contracting. This Determination of NEPA Adequacy serves as a recent review of the older 1988 Management Plan to ensure and document NEPA Land Use Plan consistency. The Campbell Tract Management Plan review was initiated in 2009 and is currently underway therefore, we continue to reference the 1988 plan for acceptable trail maintenance and corrective actions.

The new proposed parking lot resurfacing action improves upon existing trailhead access to harden the paking area and both the entrance and exit roads. The resurfacing would spread and compact new aggregate on top of existing aggregate to raise the level of the parking area and install drainage culverts where needed, to reduce the potential for spring breakup runoff and associated erosion. This project is within the same analysis area as the 1988 Plan and maintains the Campbell Airstrip Road Access Point (now known as the Campbell Airstrip Trailhead) as the primary access to the east side of the Tract (BLM 1988, pg. 41).

2) Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Given current environmental concerns, interests, and resource values, the analysis in the existing 1988 Campbell Tract Management Plan guidance is appropriate with respect to this proposed action.

3) Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updates lists of BLM-

sensitive species)? Can you reasonable conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

New information and new circumstances, such as recent endangered species listings or updated lists of BLM-sensitive species, do not present any new information or circumstances that would substantially change the analysis of the new proposed action.

4) Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

The direct, indirect, and cumulative effects that would result from implementation of this proposed action do not constitute further review aside from the analysis provided in the 1988 Campbell Tract Management Plan.

5) Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

The public involvement and interagency review associated with the existing 1988 Campbell Tract Management Plan is adequate for the current proposed action.

E. Persons/Agencies/BLM Staff Consulted

Name	Title	Resource/Agency Represented
1) Donna Redding	Cultural Resources	BLM
2) Bruce Seppi	Wildlife Biologist	BLM
3) Geoff Beyersdorf	Subsistence	BLM
4) Laurie Thorpe	Vegetation, Invasive Species	BLM
5) Jorjena Daly	Recreation Manager	BLM

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

James M. Fincher 1/13/2010

James M. Fincher, Anchorage Field Office Manager

EXHIBIT A: TRAIL CONTRACT SCOPE OF WORK

SECTION C – DESCRIPTION OF SERVICES/STATEMENT OF WORK

C.1.0. GENERAL

The contractor shall mobilize and furnish all labor, materials, equipment, tools, transportation, and supplies, except where specified and provided by the government. The contractor shall perform all work required to complete the project in accordance with drawings, specifications, and provisions of the contract.

C.1.1. BACKGROUND

The Viewpoint Trail is part of the Anchorage-wide "Tour of Anchorage Trail," for the annual nordic ski marathon event held on the trail. It is a highly developed, gravel surface, 8-foot wide trail that serves multiple, non-motorized trail users. The trail is most similar to a U.S. Forest Service Trail Class 4 designated trail with a wide, smooth trail tread. It accommodates two-way travel, trail obstacles are rare to non-existent, and vegetation is cleared out of the way. One interpretive wayside exhibit exists in this trail section with two interpretive panels and one bench. The existing trail tread has been built up and maintained over the years with imported gravel materials and repeatedly hardened with a single drum, vibrating roller. The highest impact users, that would guide design parameters and management guidelines for this trail, include skijorer, equestrian, and bicycle.

C.1.2. EXISTING CONDITION

The existing trail surface is compacted gravel. There are low-lying sections of this trail, where gravel has eroded, that tend to hold water and cause trail erosion and widening each year. These low sections create poor late winter/early spring ski conditions. To avoid these low, wet trail sections, trail users attempt to go around and widen, or braid the trail. A raised trail surface, coupled with improved ditching, would help eliminate these problems.

C.1.3. OBJECTIVE

The work to be completed must:
(1) Improve trail drainage and ditching to route water away from the trail tread.
(2) Raise the trail crown on the entire length of trail by hauling and spreading material on top of the existing trail tread.
(3) Raise the trail crown more predominantly in the lower, wet trail sections by hauling and spreading material at an increased depth of in these areas.
(4) Haul, spread and compact the Bureau of Land Management-provided "E1" aggregate over top of the existing trail tread.
(5) Seed and mulch all areas outside of the trail tread disturbed through construction activities, including designated machinery turn-arounds.

An average depth of three inches was used to estimate gravel required for this 8-foot wide trail, understanding that gravel depths will vary according to the need to achieve more depth and deliver greater amounts to low-lying areas.

C.1.4. CONTRACTOR REQUIREMENTS

GENERAL SPECIFICATIONS

Handling Materials. The contractor must transport and handle all materials to preserve their quality and fitness for the work. The contractor must stockpile, load, and transport aggregates in a manner that will preserve specified gradation and avoid contamination.

CONSTRUCTION SPECIFICATIONS

Commencement of Work. The contractor must walk the project with the COR prior to commencing work.

Mobilization. The contract work consists of moving personnel, equipment, material and incidentals to the project and performing all work necessary before beginning work at the project site. Mobilization is not intended to pay for the costs of materials before they are used on the project site.

Existing Trail Drainage Restoration. The contractor must perform drainage improvement work that consists of restoring the original trail template drainage, including excavation and restoration of ditches to facilitate drainage away from the trail by removing rocks, roots, and sticks to make ditches clear and free draining.

Aggregate Surfacing. The contractor must haul, spread, water, place, and compact aggregate surface while also creating appropriately-placed drain dips and rolling dips to facilitate trail drainage. The BLM will procure and provide privately-sourced "E1" aggregate to be stockpiled 800 feet from BOP (see Exhibit B map).

Spreading and Compacting. The contractor shall compact aggregate when moisture content is optimum for binding (damp, not soaking wet). Compaction must be obtained by mechanical vibratory compaction over the full area of each layer until visual displacement ceases, but not fewer than three complete passes and 90% of maximum density.

Contractor must provide compaction tests. One compaction test must be conducted per every 500 feet of trail by an American Association State Highway Transportation Officials-accredited (AASHTO) lab. Maximum density would be determined using ASTM D1557. Percent compaction would utilize a nuclear test method determined by ASTM D6938. EMC Engineering, one example Anchorage AASHTO-accredited lab, quoted a price of $25 per such nuclear test.

Immediately following final spreading, smoothing, and compacting, the contractor must correct any irregularities or depressions that develop by adding or removing material until the surface is smooth, uniform, and compacted.

Seeding and Mulching. The contractor must prepare seedbeds and furnish and place required seed, fertilizer, and mulch on machinery-impacted areas outside the 96" finished trail tread as well as those areas designated as vehicle turnarounds. The seed must be the "CCSC seed mix" available locally at Alaska Mill and Feed. This mix sold for $7.06/lb in 2009 and is comprised of 55% Arctic Red Fescue and 45% Nortran Tufted Hairgrass. Seeding must occur in areas that require revegetation post-construction. Placement of native debris (PND) is required to prevent off-trail traffic and to protect newly seeded areas.

AGGREGATE MATERIAL

The BLM will procure and provide privately-sourced "E1" aggregate. The estimated availability of the "E1" aggregate is May 15, 2010, or within 4 days of the road hauling restrictions being lifted to allow for transport (potentially as late as June 15, 2010). The E1 aggregate to be procured will meet the State of Alaska standards for highway construction.

The location of the aggregate stockpile will be near the North end of the airstrip (see attached map) and will require hauling a distance of 800 feet to the beginning of project (BOP).

Using a trail width of eight feet and an average depth of three inches, the following estimates were generated for required aggregate:

Base Bid

- To resurface 1,848 feet of Viewpoint Trail from the BOP to the junction with Birch Knob Trail, an estimated **210 ton of aggregate** (approximately 132 cubic yard) would be required.

Alternate #1

- To resurface 4,541 feet of Viewpoint Trail from the BOP to the junction with Moose Meadow Trail, an estimated **510 ton of aggregate** (approximately 323 cubic yard) would be required.

TIMING OF PROJECT WORK

Work may begin as soon as aggregate stockpile is available and trail conditions allow. Work must be completed no later than September 15, 2010. Work must be scheduled with Contract Officer Representative (COR) at least 2 weeks in advance to allow time for trail notifications, postings, and news releases to filter to all trail user groups.

ACCESS

The contractor shall access project work using the Campbell Creek Science Center Spur Trail, located east of the Campbell Creek Science Center (see attached map). The contractor shall coordinate with the COR at least 2 weeks in advance for access. The contractor shall park their large hauling truck and trailer at the gate and walk equipment in on the CCSC Spur Trail. The contractor, at their own risk, would be permitted to store construction equipment on-site over the duration of the project.

CONSTRUCTION EQUIPMENT REQUIREMENTS

The contractor shall use a loader at the aggregate stockpile.

The contractor shall use hauling and spreading equipment sized appropriately to the trail in order to minimize rutting and impacts to surrounding vegetation. The gravel hauling equipment must be similar to; a Ford F-550 five yard dump truck or smaller, a small front-end loader, or a skid steer. The gravel hauling equipment must not exceed a loaded weight of 25,000 pounds and no portion of the equipment can be wider than 8 feet. Aggregate hauling must account for trail conditions and hardness.

The compactor must not exceed 15,000 pounds or an overall width of 8 feet.

INVASIVE WEED INFESTATION PREVENTION

All tools, vehicles, and transport equipment used must be thoroughly cleaned prior to moving equipment across or onto BLM managed lands, to prevent the spread of invasive weeds. Cleaning methods for preventing the spread of weeds include washing and/or brushing equipment to remove material that can contain weed seeds or other propagates in order to ensure equipment is weed and weed seed free. High pressure washing shall be used to treat the insides of bumpers, wheel wells, undercarriages, inside belly plates, excavating blades, buckets, tracks, rollers, drills, buckets, shovels, and any digging tools.

All contract work crews shall meet with the COR and/or Invasive Weeds Specialist prior to beginning work to develop mitigation measures to prevent the spread of invasive plants.

OIL & HAZARDOUS SUBSTANCES SPILL PREVENTION & RESPONSE

The Contractor is responsible for prevention of, reporting, and cleanup of all spills of oil or hazardous substances during performance of this project at the CTF in accordance with standards in Title 18 Alaska Administrative Code, Chapter 75, Oil and Hazardous Substances Pollution Control (18AAC75). In addition to the spill reporting requirements of 18AAC75, contractor will report same to CTF Management immediately upon learning a spill has occurred.

To prevent spills, refueling will be performed only at designated locations where the contractor has established adequate spill containment and appropriate spill response materials. Spill pans will be placed under equipment when parked.

Appropriately sized and stocked spill kits will be either carried by vehicles or positioned close to where they are being operated to facilitate rapid response to a release during operation. Operators of machinery shall be properly trained for spill response, at a minimum to the HAZWOPER First Responder Operations level (29 CFR 1910.120(q)(6)(ii) level.

C.1.5. GOVERNMENT REQUIREMENTS

TRAIL TRAFFIC RE-ROUTE

Temporary traffic detour public notices and signage will be the responsibility of the COR to maintain, provided 2-week advanced notification from contractor of planned work start date. The COR and BLM staff will maintain the temporary traffic detour signs and notices during the construction period. This detour will aim to route trail users around project work using the P-38 Trail, Birch Knob Trail, and a section of trail-shared with the contractor- near the Campbell Airstrip Bridge.

The contractor must be aware that although these measures will be in place, the public commonly disregards signage and the contractor must be prepared for encounters with trail users during construction operations.

COR Responsibilities

The COR will be available to walk the project with the contractor prior to commencing work. The COR will designate one or two turnaround areas for hauling equipment and stake low, wet trail sections that require more aggregate depth. The COR and BLM personnel will maintain all trail detour and cautionary signage.
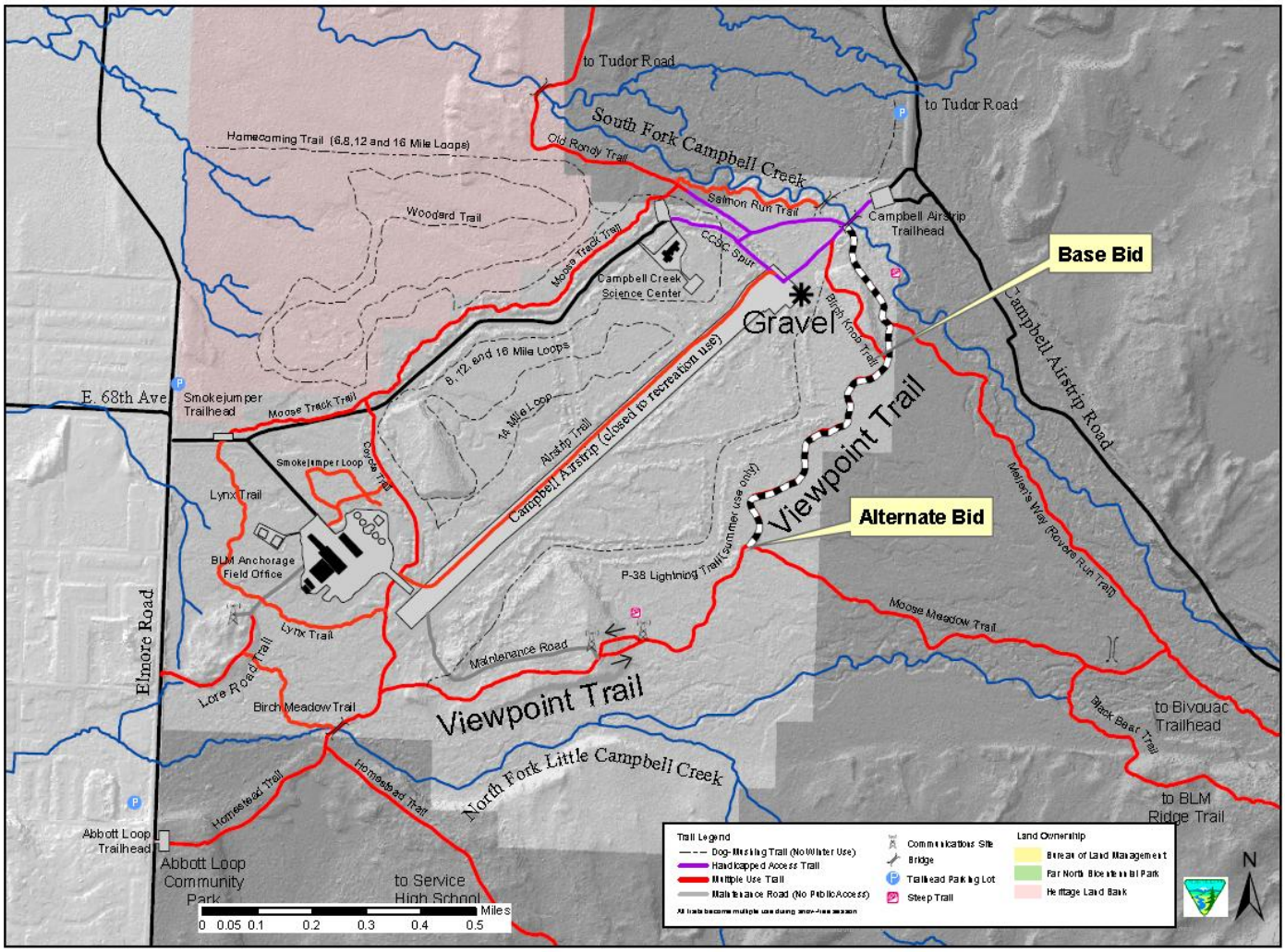
EXHIBIT B: MAP