

Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior Bureau of Land Management

Title Wainwright SRRS Interim Removal Action Modification

NEPA Number DOI-BLM-LLAKF010-2011-0006-DNA

Type of Action National Petroleum Reserve-Alaska Permit Modification (2984.01)

Serial Number FF095670

Applicants Jacobs Engineering Group, Inc.
4300 B. Street
Anchorage, Alaska 99503

Location Wainwright Short Range Radar Station
Sec. 3, T. 14 N., R. 31 W., UM

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

The proposed action is to continue the removal activity that was authorized in 2010 at the Wainwright Short-Range Radar Station (SRRS). The action involves the excavation into the shorefast ice and the removal of landfilled metal and inert debris embedded in sediments submerged under waters of the Wainwright Inlet, Wainwright, Alaska. The work would start in early April 2012, when the tundra is sufficiently frozen as directed by the Bureau of Land Management requirements. The estimated 41 tons of inert debris would be transported to Tupkak Bar following the removal action. Waste load out, offsite transportation and recycling activities would be conducted in September 2012 to coincide with the barge transportation schedule. Any non-inert debris encountered, such as lead batteries, would be containerized in metal drums and flown off site for disposal immediately following the April removal activities.

Equipment would be mobilized over a shore-fast ice access route from Wainwright. The anticipated duration of onsite remedial activities is 3 weeks. All demobilization activities would be completed before tundra access is restricted and ice integrity is compromised. All personnel would reside in commercial lodgings in the village of Wainwright and would commute daily to the site.

B. Land Use Plan Conformance

The proposed action is in conformance with the 2004 Record of Decision, Northwest National Petroleum Reserve-Alaska, Integrated Activity Plan/Environmental Impact Statement, 22 January 2004, even though it is not specifically provided for, because it is clearly consistent with the plan's objectives, goals and decisions as the proposed action relates to the protection of

resources and human uses, the protection of subsistence resources and access, and an opportunity to access oil and gas resources in the planning area.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

1. Biological Opinion for Bureau of Land Management for the Northern Planning Areas of the National Petroleum Reserve-Alaska, July 2008;
2. Decision Record, National Petroleum Reserve-Alaska Right-of-Way at the Wainwright and Lonely Defense Early Warning (DEW)-Line Sites, Environmental Assessment (DOI BLM [LLAKF010-2010-0009-EA](#)), 5 March 2010; and
3. Decision Record, Wainwright SRRS Interim Removal Action, Environmental Assessment ([LLAKF010-2010-0009-EA](#) DOI-BLM-LLAKF010-2010-0009-EA).

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 proposed project renewal is similar to the preferred alternative analyzed in the existing Environmental Assessment because winter removal of the old LF006 landfill in wetlands and marine waters has been analyzed and does not entail additional environmental impacts. This approach was discussed and agreed upon by the BLM, USAF, U.S. Army Corps of Engineers (USACE) and the Alaska Department of Environmental Conservation (ADEC) because winter excavation in these conditions results in no immediate suspension of sediments and water quality degradation. Furthermore, winter transport of equipment, labor, and wastes across the tundra to the project site is the best practice for protecting protected waterfowl species, the tundra, the shoreline, and the inlet waters and sediments.

The proposed work site is located within Wainwright Inlet on the southernmost portion of the Wainwright SRRS; a portion of the transportation corridor to worksite will be on the lands of the Wainwright SRRS. The project area was part of the original authorization, but was not completed when the scale of excavation of the beach portion of the landfill became greater than estimated, and funding was depleted.

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?**

The range of alternatives analyzed in the existing EA is appropriate with respect to the new proposed action. The DOI-BLM-AK-023-2009-0013-EA considered three alternatives (no action, clean-up of all materials, and provide a ROW permit (the interim preferred alternative), and the analysis evaluated impacts of the no action and the preferred alternatives. Olgoonik Development Corporation has a BLM right-of-way on the Wainwright SRRS, but has provided a letter of non-objection concerning the proposed project's use of the airstrip. There will be no conflict between uses and activities at the SRRS.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, and updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

The USFWS issued a decision designating critical habitat for polar bears. The proposed project will not affect Stellers and spectacled eiders by taking place in the winter. The proposed project is within the range of the polar bear. While the Wainwright SRRS lands are excluded from designated polar bear habitat, the transportation route to the Tukpak Bar barge landing area is within designated critical habitat. Project specific mitigating stipulations have been developed and are recommended in order to minimize potential impacts to polar bears.

The proposed action and ROW would occur on lands that have been impacted by modern human activity since the 1950's. Due to the proximity to Wainwright and the DEW-Line site, these are not Lands with Wilderness Characteristics (LWC's), therefore no analysis on impacts to LWC's is warranted.

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 the project renewal are similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA documents because the project timeline, and activities have not significantly changed. The change is minor in nature, scope and intensity.

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 EA is adequate for the project renewal. Additionally, there are regular coordination meetings between the BLM, USAF, USACE and ADEC to discuss the project.

E. Persons/Agencies /BLM Staff Consulted

NAME	POSITION	OFFICE
Susan Flora	Environmental Scientist	BLM Arctic Field Office
Richard Kemnitz	Hydrologist	BLM Arctic Field Office
Mike Kunz	Archaeologist	BLM Arctic Field Office
Stacey Fritz	Anthropologist	BLM Arctic Field Office
Debbie Nigro	Wildlife Biologist	BLM Arctic Field Office
Roger Sayre	Planning & Environmental Coordinator	BLM Arctic Field Office
Matthew Whitman	Fish Biologist	BLM Arctic Field Office
Donna Wixon	Natural Resource Specialist	BLM Arctic Field Office
Linda Demientieff	Realty Specialist	BLM Arctic Field Office
Dave Yokel	Wildlife Biologist	BLM Arctic Field Office

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

F. 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 the NEPA.

/s/Linda Demientieff
Signature of Project Lead

/s/Roger Sayre
Signature of NEPA Coordinator

/s/Lon Kelly
Signature of the Responsible Official

March 30, 2012
Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations. A Decision Document may be required (if the Decision Document for the previously-completed action does not apply), consistent with program requirements.