

# 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-LLAKF010-2011-0004-DNA

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

**Serial Number** FF095666

**Applicants** Olgoonik Specialty Contractors, LLC  
360 West Benson, Suite 301  
Anchorage, AK 99503

**Location** Wainwright Short Range Radar Station  
Lot 1, USS 5252, Sec. 34, T. 15 N., R. 31 W., UM

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

The proposed action is to modify a portion of the currently authorized project from landfarming the diesel impacted mineral soils on the Wainwright SRRS main gravel pad to land-spreading the materials on the Wainwright SRRS closed airstrip. The soils are spread in a thin layer (less than six inches thick) on the closed airstrip. The soils were randomly sampled for Diesel Range Organics (DRO) with results less than 1,000 ppm DRO.

The U.S. Air Force (USAF) has indicated that the sites are in need of environmental clean-up and abandonment. The current right-of-way for the site was established in 1986 to manage for continued radar and defense monitoring. “Upon termination of the grant, structures and buildings shall be removed and the land rehabilitated to the satisfaction of the Arctic Area Manager”, and “[a]ll trash and debris associated with operations under this grant must be removed to an approved solid waste disposal site.” The proposed action is part of the USAF’s process in meeting this stipulation.

### **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-AK-023-2009-0013-EA; LLAKF01000-2009-0013; LLAKF01000-2009-0013-EA), 16 April 2009; and
3. Decision Record, Wainwright SRRS Interim Removal Action, Environmental Assessment (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 modification is similar to the preferred alternative analyzed in the existing Environmental Assessment because land-spreading is the final step of landfarming, and does not entail additional environmental impacts. The level of diesel contamination in the mineral soil materials is low enough to be spread on surfaces such as the Wainwright SRRS closed airstrip. 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 the contamination was low enough, the site is not actively used by people, and given the additional material volume it is more efficient, cost effective for the government and has the same results as landfarming, which is a cleaner environment.

The project area is similar between the proposed modification and the original authorization in that the work will all be done at the Wainwright SRRS. The difference is that the original authorization was for an area on the main gravel pad behind buildings in order to not hinder site access, while the proposed modification is to use the airstrip. As is typically the scenario, more materials were removed from the Beach Diesel Tank pad than planned, which required all of the authorized area for staging the materials.

The differences in the authorized and proposed modified project area are not substantial because the project area is still on the Wainwright SRRS gravel pad, and it will not affect any authorized uses as the airstrip is officially closed and not used by aircraft without prior BLM approval.

- 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. 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. There is designated critical habitat in the vicinity of Wainwright as it is on the Chukchi Sea coast, but the Wainwright SRRS is outside the designated area. While the new circumstances may have affected the winter portion of the originally authorized project, it would not change the analysis of the proposed project modification because it is summer work. There is no new information and/or circumstances related to T&E species or BLM species of concern that may be in the Wainwright vicinity during the summer.

The proposed action and ROW would occur on lands that have been impacted by human activity since the 1950s. Due to the proximity to Wainwright and the DEW-Line site, and airstrip, these are not Lands with Wilderness Characteristics (LWCs), therefore no analysis on impacts to LWCs 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 modification are similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document because the project timeline, activities and greater footprint 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 modification. Additionally, there are regular coordination meetings between the BLM, USAF, USACE and ADEC to discuss the project.

**E. Persons/Agencies /BLM Staff Consulted**

<b>NAME</b>	<b>POSITION</b>	<b>OFFICE</b>
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
Shane Walker	Natural Resource 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.

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/s/Shane Walker  
Signature of Project Lead

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/s/Roger Sayre  
Signature of NEPA Coordinator

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/s/Lon Kelly  
Signature of the Responsible Official

February 22, 2011  
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.