

Worksheet

Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)

Note: This worksheet is to be completed consistent with the policies stated in the Instruction Memorandum entitled “Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy” transmitting this worksheet and the “Guidelines for Using the DNA Worksheet” located at the end of the worksheet. (Note: The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM’s internal analysis process and does not constitute an appealable decision.)

A. BLM Office: Arctic Field Office **Lease/Serial/Case File No.** AA 086604, AA 086615, AA 086616, AA 086617, FF095310

Proposed Action Title/Type: Deviation Request for right of way grant

Location of Proposed Action: Umiat Meridian, Township 2 South, Range 6 West, Section 3,4,10,15,22-25, Umiat Meridian, Township 1 South, Range 6 West, Section 8-11,14-17, 19-22,28-33.

Description of the Proposed Action: The proposed action is a request for a deviation from the Required Operating Procedure (ROP) C-2(b) of the 2004 Northwest National Petroleum Reserve Alaska Integrated Activity Plan/ Environmental Impact Statement Record of Decision. The applicant requests limited access and use of construction equipment – to construct a snow/ice bridge along the trail at Prince Creek, and to perform minimal trail maintenance as needed to ensure adequate snow/ice cover to portions of trail experiencing inadequate snow cover to minimize the breakage, abraision, compaction or displacement of vegetation during the operation.

Applicant (if any): Anadarko Petroleum Corporation

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

LUP Name* NPR-A NW IAP/EIS Date Approved 1/22/2004

- *List applicable LUPs (e.g., Resource Management Plans or applicable amendments).
- **List applicable activity, project, management, water quality restoration, or program plans.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

<u>NPR-A NW IAP/EIS</u>	<u>1/22/2004</u>
<u>Anadarko DOI-BLM-AK-023-001-EA</u>	<u>11/14/2008</u>

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

Documentation of answer and explanation:

The current proposed action is the same type of action in the same area as that evaluated in the EAs listed above. The EA mentioned above specifically covered the area and the use of equipment. The proposed action is in conformance with the LUP, even though it is not specifically provided for, “Removal activities might use heavy equipment, such as large and small backhoes, 988-size front-end loaders, bulldozers to the size of a D-9, dump trucks, pickups, and all-terrain vehicles. This type of equipment would be transported overland in winter(NW NPR-A IAP/EIS Page IV-43)”.

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

Documentation of answer and explanation:

The NPR-A NW IAP/EIA and EA as noted above, range of alternatives is broad enough to include current concerns, interests, values, and circumstances. As noted above, the EA was specifically written to cover this area.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Documentation of answer and explanation:

The existing analysis continues to be valid for a right of way grant. The EA contributors reviewed the proposal and found that the information used in evaluating the EA referenced above had did not change the evaluation already completed for this project. ROP C-2 of the NW NPR-A IAP/EIS ROD,” by limiting vehicle use to winter months, would protect soils in the Planning Area. Limiting vehicle use to winter months has proven valuable as a technique for the protection of soils.”

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Documentation of answer and explanation:

The methodology and approach used in the relevant NEPA documents continue to be valid.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action?

Documentation of answer and explanation:

The direct and indirect impacts of the proposed action, required stipulations from the Integrated Activity Plans/ Environmental Impact Statements, and required Operating Procedures are expected to be negligible.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?

Documentation of answer and explanation:

No additional analysis is necessary for this proposal as it was adequately addressed in the EA listed above.

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

Documentation of answer and explanation:

The public involvement and agency review are adequate for the proposed action.

E. Interdisciplinary Analysis

1. Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
<u>Donna Wixon</u>	<u>Natural Resource Specialist</u>	<u>Resources</u>
<u>Shane Walker</u>	<u>Natural Resource Specialist</u>	<u>Resources</u>
<u>Mike Worley</u>	<u>Realty Specialist</u>	<u>Realty</u>
<u>Dave Yokel</u>	<u>Wildlife Biologist</u>	<u>Wildlife</u>

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

The applicant was provided, Stipulations for Anadarko Petroleum Corporation FF095310. The exception approval will have the following additional requirements:

1. Only applicable to the snow trail portion located within the Northwest NPR-A planning area;
2. Limited to perform trail maintenance to ensure adequate snow/ice cover to portions of trail experiencing inadequate snow cover to minimize the breakage, abrasion, compaction or displacement of vegetation during the operation of said construction equipment and pickup trucks on the snow trail;
3. Limited to minimum traffic volume by the requested construction equipment and pickup trucks; and
4. Contingent upon adequate vegetation cover and limited vegetation disturbance(s). For the purpose of this project and this season, within the scope and objective of ROP C-2 and all other stipulations and ROPs, "limited vegetation disturbance" means only sporadic or occasional

vegetation disturbance. If more than a limited amount of vegetation disturbance occurs, operations must immediately cease and you must notify me, the Authorized Officer, as soon as is practically possible. The BLM and Anadarko will then evaluate the operations, trail conditions and environmental conditions to determine future actions.

CONCLUSION

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

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

/s/Donna Wixon, Natural Resource Specialist Arctic Field Office

1/16/2009

Date

DECISION

I have reviewed this plan conformance and NEPA compliance record and have determined that the proposed project is in conformance with the approved land use plan and that no further environmental analysis is required.

The evaluation and finding done to comply with Section 810 of ANILCA in the original EA for the project found no significant restrictions to subsistence use.

It is my decision to implement the project, as described, with the mitigation measures identified above.

The terms, conditions, and stipulations contained in this case file for this action will apply to this permit.

/s/Lon Kelly, Arctic Field Manager

1/16/2009

Date