

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.** FF095495

Proposed Action Title/Type: Defense Environmental Restoration Program- Removal Action Umiat Test Well No. 9/ Right of Way Grant

Location of Proposed Action: National Petroleum Reserve- Alaska - Umiat

Description of the Proposed Action: The BLM Arctic Field Office in Fairbanks is proposing to authorize a right of way grant to conduct cleanup activity on federal lands in the NPR-A. This work is necessary to remove hazardous materials and wastes, unsafe structures and debris from areas formerly used by the Department of Defense. The former Umiat Air Force Station is a Formerly Used Defense Site (FUDS). The USACE has responsibility for clean-up of surface contamination under the FUDS program. The proposed action would authorize the USACE through their contractor Marsh Creek LLC. to conduct the necessary clean-up at and around the Umiat No. 9 well site. The proposed time frame for this program is February through May 2009. The proposed project is similar to clean-up programs completed in the NPR-A in past winter seasons such as Umiat #1 and #5 wells. Additional information on hazardous material or debris removal environmental consequences can be found in the 2008 NE NPR-A Supplemental IAP/EIS (Volume 3 Chapter IV).

Applicant (if any): United States Army Corps of Engineers - Alaska

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

LUP Name*	<u>NE NPR-A Supplemental IAP/EIS</u>	Date Approved	<u>7/16/08</u>
LUP Name*	<u>CRSAMP</u>	Date Approved	<u>7/1/08</u>

*List applicable LUPs (e.g., Resource Management Plans or applicable amendments).

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.

NE NPRA SIAP/EIS

NE NPRA SIAP/EIS ROD

Colville River Special Area Management Plan Environmental Assessment EA-AK-023-08-01

EA AK-023-08-002 Renaissance Umiat, LLC 2 year Delineation Drilling Program

United States Army Corps of Engineers (USACE) EA Removal Action Test Well no. 9 Contaminated Soil Former Umiat Air Force Station Umiat, Alaska

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?

Documentation of answer and explanation:

The current proposed action is a type of action anticipated in the NE NPRA S IAP/EIS. The action was specifically addressed in the USACE EA. The other two EAs were evaluations for other types of pertinent activity in the area.

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 NE SIAP/EIS range of alternatives is broad enough to include current concerns, interests, values, and circumstances.

3. Is the existing analysis valid in light of any new information or circumstances (such as, Rangeland health standard assessment, recent endangered species listings, 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?

Documentation of answer and explanation:

The existing analysis is adequate for this proposal. The USACE EA was reviewed by the BLM Arctic Field Office Interdisciplinary Team. The staff found no issues with the project which would necessitate writing a new EA. However, there are items that need clarification/correction from the USACE EA. They are;

1. Section 1.2 Site History

The dates (1960 & 1970) listed for establishment of the NPR-A and Transfer to BLM are incorrect. In 1976 Congress passed the Naval Petroleum Reserve Production Act and the administration of the reserve was transferred to the Department of the Interior.

2. Section 3.3 Ice Road Construction

The EA does not address specific information on water withdrawal.

Marsh Creek, LLC has obtained a temporary water use authorization from the State of Alaska for this project. The three lakes for water withdrawal for this project are: Umiat Lake,

RTS07131 and MO681. All lakes are reported to be not fish bearing therefore all have been designated for ice aggregate withdrawal not to exceed 20% of the total of the lake volume. Available water found under ice may be withdrawn up to the total permitted yearly volume for the source. The combined total of water and/or ice aggregate approved is 2.00 million gallons.

3. Section 4.4.2 Biological Resources

Bird species that may be present in the project area during the winter are limited to ravens, owls, and gyrfalcons. This list should be corrected to include ptarmigan.

Peregrine falcons and rough-legged hawks may begin to nest along river bluffs as early as March (USACE 2000; BLM 2007); statement should be corrected to say gyrfalcon not peregrine falcons.

4. Section 5.2 Effects on Biological Resources - Endangered and Threatened Species
This sentence applies to this section, "This project is considered to be wholly beneficial to any threatened species that may use the area in the future."

5. Sections 3.5 Site Restoration and Seeding and 5.1 Effects on the Physical Environment
The EA asserts that "BLM requested that the excavation area not be backfilled". This statement should be restated. BLM is requesting that the portions of excavation that might end up below grade be contoured to assure no pooling of water. Backfilling will occur if any discrete holes are created during removal of contaminated soils.

Background information:

1) The drilling muds (which should constitute the bulk of the contaminated soil to be removed) were discharged on top of the original topography. Thus the removal of soils would more accurately be described as a "removal of deposited drilling wastes". Admittedly, since petroleum products can and do leach downward into the underlying soils, it can be anticipated that some of the native soils would also have to be removed.

2) The site is a side hill, which appears to be dry and sparsely vegetated. Backfilling--particularly with Colville River gravel (no organics, which can hold moisture)--probably would do little or no good in stabilizing the site or in getting vegetation reestablished. Contouring the excavation area to blend in with the surrounding side hill would likely result in a stable situation capable of revegetating.

3) If "potholes" are created (by excavating pockets of contaminated soils) that cannot be readily recontoured, then these spots should be backfilled. However, there are no local areas (on BLM-managed lands) that could be mined to provide this material.

4) Not backfilling the removal zone would save the Corps money, would result in just as stable of a site (if adequately contoured), and would be amenable to BLM, if the ACOE wetlands division also concurred.

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?

Documentation of answer and explanation:

The direct, indirect and cumulative effects of the proposed action are similar to those evaluated in the NE NPR-A Supplemental SIAP/EIS Chapter IV Activities Not Associated With Oil and Gas Exploration and Development. The BLM EA AK-023-08-002 evaluated effects of a greater magnitude than the proposed action and resulted in a Finding of No Significant Impact.

5. 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. The USACE publicly noticed the proposal for thirty days. Aside from BLM comments USACE received comments from the North Slope Borough which were positive in nature.

E. Interdisciplinary Analysis: 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>Project Lead</u>
<u>Susan Flora</u>	<u>Environmental Scientist</u>	<u>Hazardous Material</u>
<u>Dave Yokel</u>	<u>Wildlife Biologist</u>	<u>Wildlife</u>
<u>Matthew Whitman</u>	<u>Fisheries Biologist</u>	<u>Fisheries</u>
<u>Richard Kemnitz</u>	<u>Hydrologist</u>	<u>Hydrology</u>
<u>Mike Kunz</u>	<u>Archeologist</u>	<u>Archeology</u>
<u>Stacie McIntosh</u>	<u>Anthropologist</u>	<u>Subsistence</u>
<u>Debbie Nigro</u>	<u>Wildlife Biologist</u>	<u>Avian</u>
<u>Roger Sayre</u>	<u>Planning & Environ Coord</u>	<u>NEPA</u>

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. 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 will abide by the required operating procedures derived in the NE NPR-A Supplemental IAP/EIS Record of Decision and the following project specific stipulations:

1. The applicant or their contractor will provide the BLM with a weekly activities summary report via e-mail to: Donna_Wixon@blm.gov, MWorley@blm.gov, and SWalker@blm.gov.
2. Provide the BLM with copies of any reports required by other agencies.
3. The portions of excavation that might end up below grade are to be contoured to assure no pooling of water. Backfilling shall occur if any discrete holes which would collect surface water are created during removal of contaminated soils.
4. Confer with the BLM Authorized Officer prior to initiating water removal from Umiat Lake to develop a monitoring program acceptable to the BLM, with the objective of avoiding disturbance and uptake of bottom sediments. At a minimum, this plan will include analysis of background water quality (under ice) and analysis of water quality (under ice) upon completion of water withdrawal, and a quality assurance plan to ensure that lake sediments are not disturbed and that state when additional associated sampling should occur. In addition to turbidity and other parameters, samples will be analyzed for diesel range organics (DRO) by Alaska Method 102, and

for polynuclear aromatic hydrocarbons (PAH) or for BETX (benzene, ethylbenzene, toluene, and xylene by EPA Method 624) to quantify concentrations of lighter petroleum fractions.

5. Maintain a daily record of where water from Umiat Lake was used, and submit to the BLM AO at the end of the drilling season.

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.

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, Project Lead, Arctic Field Office

/s/Roger Sayre, NEPA Coordinator, Arctic Field Office

/s/Lon Kelly, Manager, Arctic Field Office

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.