

# DETERMINATION OF NEPA ADEQUACY (DNA)

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

OFFICE: LLAKF02000

TRACKING NUMBER: DOI-BLM-AK-F020-2013-0026-DNA

CASEFILE/PROJECT NUMBER: AKFF096410

LOCATION/LEGAL DESCRIPTION: Tanacross Airfield/ USS 2631

APPLICANT: Native Village of Tanacross

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

On June 11, 2012 the Bureau of Land Management (BLM) adopted the Environmental Assessment (EA) prepared by the United States Army Corps of Engineers (NEPA document # DOI-BLM-AK-F020-0025-EA) which analyzed the impacts of removing petroleum-contaminated soils from two areas within the Tanacross Airfield (USS 2631). The preferred alternative that was adopted was the Removal Action Alternative detailed in the Native Village of Tanacross project work plans (Tutka LLC 2012; TGS LLC 2012). The activities included the removal of approximately 300 cubic yards of petroleum-contaminated soil from the Alaska Communications System site (Area 3/ Impact #97) and the removal of approximately 1,000 cubic yards of petroleum-contaminated soil from the airfield Aboveground Storage Tank Site (impact #75) and the Former Fueling Station Site (impact #101).

Permit #AKFF096410 was issued to the Native Village of Tanacross by the BLM on July 6, 2012. This permit authorized the above described soil removal. During the field work conducted in 2012 by the Native Village of Tanacross, it was discovered that not all of the petroleum-contaminated soil was removed from Area 3/ Impact #97.

The Native Village of Tanacross now proposes to continue remediation of petroleum-contaminated soils on BLM-managed land within Area 3/ Impact #97 with the removal of approximately 500 additional cubic yards of petroleum-contaminated soil. This is consistent with the removal action identified in the Environmental Assessment (NEPA document # DOI-BLM-AK-F020-0025-EA). Mitigation measures identified during the NEPA process have been formulated into permit stipulations, which are incorporated into the Land Use Permit by reference as Attachment A: Land Use Permit Stipulations.

## **B. Land Use Plan (LUP) Conformance.**

LUP Name: Fortymile Management Framework Plan

Date Approved: September 8, 1980

The proposed action is located within the Fortymile Management Framework Plan (Fortymile MFP). The proposed action is in conformance with the Fortymile MFP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions): The Fortymile MFP addresses cleanup of waste sites as recommended actions to implement Objective 7 (Terminate and prevent unauthorized use on public lands in the Resource Area), but does not specifically address the location of the Tanacross Airfield. The MFP was written with the goal of providing the most appropriate management, in accordance with principals of multiple-use. In this case, the cleanup is intended to protect and enhance water quality in the vicinity of the Native Village of Tanacross.

Similar activities recommended by the Fortymile MFP include the cleanup of a dumpsite near Eagle (activity Lands 7.1), and the cleanup and closure of a Bureau dump behind the Tanacross Fire Guard Station (activity Lands 7.2). The proposed removal of petroleum-contaminated soils from the Tanacross Airfield is consistent with the management intent of the Fortymile MFP.

## **C. Identify applicable NEPA documents and other related documents that cover the proposed action.**

NEPA document # DOI-BLM-AK-F020-0025-EA was completed by the U.S. Army Corps of Engineers and adopted by the BLM on June 11, 2012.

## **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 action is a feature of the preferred alternative analyzed in DOI-BLM-AK-F020-0025-EA (adopted June, 11 2012). The Preferred Alternative is identified as the Removal Action Alternative detailed in the Native Village of Tanacross project work plans (Tutka LLC 2012; TGS LLC 2012) which include the removal of approximately 300 cubic yards of petroleum-contaminated soils from Area 3/ impact #97. This removal activity was started in July of 2012, at which time it was discovered that the petroleum-contaminated soils area within Area 3/ impact #97 was larger than originally anticipated. The Native Village of Tanacross now proposes to

expand the removal area by 500 cubic yards within Area 3/ impact #97 in order to complete the removal of petroleum-contaminated soils.

The No-Action Alternative was analyzed and found not to be preferred because while no action would avoid the short-term disruptions that would be caused by the operation of heavy equipment and excavation of soil, a large area of contaminated soil would remain in place which would limit the use of the area by the community and possibly allow the migration of contaminants to nearby wetlands and subsistence areas.

**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?**

Yes. The range of alternatives includes the proposed action and the analysis occurred last year. No changes in environmental concerns, interests and resource values have occurred.

**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?**

The analysis is current and valid. No new information or circumstances have been identified. It is reasonable to conclude that new information and circumstances would not substantially change the analysis of the new proposed action, which is the continued removal and remediation of petroleum-contaminated soils from an area that has already been partially remediated.

**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?**

Yes, this action is directly assessed in the existing NEPA document. Water quality impacts from past public and private activities are known to exist in specific areas within in the eastern Tanana River region; however, a comprehensive study of potential impacts has not been conducted. Unremediated sites have the potential to leach contaminants into the ground water. However, past and current unconnected projects have been completed or are underway within the area to remediate impacts at individual sites and to monitor water quality. Given the statutory requirements associated with the clean-up of contaminated sites and public concern for health and safety, it is reasonable to expect that additional site clean-up and monitoring efforts will continue into the foreseeable future. The combination of past, current, and future activities are likely to improve water quality within the area. As such, it is anticipated that this project to

remove petroleum contaminated soils will have a positive cumulative effect on ground water quality in the region. The no action alternative will not add to exiting contamination levels but may increase the risk of contaminants leaching into the ground water.

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

Yes, this action underwent the appropriate review. This action is the preferred alternative identified in the NEPA document.

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

Name	Title	Resource/Agency Represented
Lenore Heppler	Eastern Interior Field Office (EIFO) Manager	BLM/ EIFO
Michael Gibson	EIFO Assistant Manager	BLM/ EIFO
Robin Mills	EIFO Archeologist	BLM/ EIFO
Roger Sayre	Arctic Field Office (AFO) Planning and Environmental Coordinator	BLM/ AFO

\*Note: Refer to the EA/EIS for a complete list of 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 LUP and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

/s/ Michael Gibson

8/30/2013

Project Lead

Date

/s/ Roger Sayre

8/30/2013

NEPA Coordinator

Date

/s/ Lenore Heppler

8/30/2013

Authorized Officer

Date