



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
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Anchorage, Alaska 99507-2591  
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## DETERMINATION OF NEPA ADEQUACY (DNA) WORKSHEET

**Proposed Action Title/Type:** TERRA Broadband Project Lease modifications

**NEPA Register Number:** DOI-BLM-AK-A010-2016-0014-DNA

**Case File Numbers:** Terra NW Project cases: AA93345-A (Ungalik River), AA-93345-B (Dime), AA-93345-C (Talik), AA-93345-D (Harvey), AA-93345-E (Baldwin Peninsula); Terra Yukon Project Cases: FF-96750 (Rain), FF-96751 (Nogahabara), FF-96753 (Hunt), FF-96920 (Totson), FF-96921 (Igichuk Hills) , FF-96752 (Triplet) ; Terra SW Project Cases: AA-92971 (Otter Creek), AA-92019 (Cone); Terra Ring Closure Project Cases: and AA-94193 (Summit)

**Location / Legal Description (All in Kateel River Meridian, unless noted):**

Otter Creek T. 25 S., R. 12 W., Sec. 16

Cone T 9 S, R 74 W., Sec. 34 (Seward Meridian)

Ungalik T 9 S., R. 10 W., Sec. 21

Dime T. 4 S., R. 10 W., Sec. 33

Talik T. 1 N., R. 9 W., Sec. 4

Harvey T. 9 N., R. 9 W., Sec. 21

Triplet T. 10 N., R. 4 E., Sec. 17

Baldwin Peninsula T. 13 N., R. 15 W., Sec. 14

Rain T. 4 S., R. 3 E., Sec. 14

Nogahabara T. 4 N., R. 5 E., Sec. 2

Hunt T. 9 N., R. 5 W., Sec. 15

Totson T. 12 S., R. 8 E., Sec. 17

Igichuk Hills T. 21 S., R. 18 W., Sec. 17

Summit T. 8 S., R. 4 W., Sec. 3

**Applicant (if any):** Unicom, Inc.

### A. DESCRIPTION OF THE PROPOSED ACTION

Unicom has submitted to the BLM to change in their current leases or plans of development to include:

1. The refueling window to start the first week of June on all BLM Terra communication

sites.

2. The Dime Repeater's height by increasing it 10 additional feet (from 60 to 70). This involves no new change of use or location and the work would be conducted within the Lease area footprint. The extension of the tower would be flown to the site by helicopter and the extension does not have lights or guy wires
3. New landing pads either "plank wood" type like those found at the Baldwin Peninsula (approximately 25 feet by 25 feet within the 30,000 square foot ROW lease area) or made of framed steel (or aluminum) with a fiberglass landing platform approximately 12 feet x 12 feet are proposed. All BLM Terra communication sites would be authorized for either a plank type landing system approximately 25 feet by 25 feet or a fiberglass steel/aluminum platform 12 feet by 12 feet on any site where safety conditions dictate an improved helicopter landing site.
4. The use of an internal fuel delivery system in the Bell UH-1 helicopters, when available, rather than a sling load on all BLM Terra communication sites.

### Construction

Tower:

The additional 10 feet of tower for the Dime repeater would be slung to site by helicopter and bolted to the existing tower.

Platforms:

The wood platforms or elevated platforms would be slung to each site by helicopter. The fiberglass platform will require posts placed in the ground by hand digging or a power drill.

### Decommission

Removal of the additional platforms would take place at the communication sites when site decommission of the communication site takes place and will be the reverse of the installation process though with a shorter timeframe. The same equipment and crew facilities would also be required. Any remaining fuel would be pumped out of the tanks into containers and removed from the site via helicopter. Connections between modules and towers would be removed and antennas would be taken down.

Welds for the tanks and shelters would be broken/cut and the equipment would be removed with the heavy lift helicopter. The tower would be taken down piece by piece and removed via helicopter. Once at ground level, the grout in the pile foundations would be broken up (to a level 6 inches below grade) and the pilings and caissons would also be cut off approximately 6 inches below grade.

Final reclamation will be coordinated with the BLM in order to determine which foundation items need to be removed. The ground would be re-graded if necessary and fertilization or replanting of native vegetation would be conducted as directed.

## **B. LAND USE PLAN CONFORMANCE**

The proposed action is in conformance with the applicable land use plan because it is specifically provided for in the following land use plan decision(s):

The Proposed Action would be located on federal lands managed under the *Kobuk-Seward Peninsula Resource Management Plan (RMP) Record of Decision* (BLM 2008).

The *Kobuk-Seward Peninsula RMP* was approved in 2008 and encompasses the Igichuk Hills Repeater and land adjacent to the Hunt Creek and Triplet repeaters. The *Kobuk-Seward Peninsula RMP Record of Decision* (BLM 2008) established required operating procedures (ROPs) applicable to BLM-permitted activities within the boundary of the RMP.

## **C. IDENTIFY APPLICABLE NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTS AND OTHER RELATED DOCUMENTS THAT COVER THE PROPOSED ACTION.**

- *TERRA Southwest (SW) Environmental Analysis*, DOI-BLM-AK-A010-2011-0008-EA. Corresponding Finding of No Significant Impact (FONSI) and Decision Record (DR) signed April 20, 2011.
- *TERRA Northwest (NW) Environmental Analysis*, DOI-BLM-AK-A010-2012-0036-EA. Corresponding Finding of No Significant Impact (FONSI) and Decision Record (DR) signed June 19, 2013.
- *TERRA Yukon Environmental Analysis*, DOI-BLM-AK-A010-2014-0004-EA. Corresponding Finding of No Significant Impact (FONSI) and Decision Record (DR) signed January 13, 2016.
- *TERRA Ring Closure Determination of NEPA Adequacy*, DOI-BLM-AK-A010-2016-0010\_DNA. Decision Record (DR) signed April 25, 2016.

## **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 (to authorize a longer refueling window, add helicopter platforms, increase the Dime repeater site by 10 feet, and the use of an internal fuel delivery system) is similar to the same proposed action as the Terra Yukon and Terra Northwest projects whereby BLM authorized microwave repeater stations, five of which were on remote mountains tops within the

Nulato Hills. The geographic and resource conditions of the proposed action are the same as that analyzed in the Terra Northwest EA, and the Terra Yukon EA. The project is located within the Nulato Hills and Baldwin and Seward Peninsula, on primarily remote mountain tops and the resource conditions are essentially the same in terms of ungulate populations (caribou, moose), Threatened and Endangered (T&E) species, and the tundra environment (void of known invasive species, lichen cover/mixed tussock tundra).

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 in the Terra Northwest and Yukon EA (to authorize communication sites or not) is appropriate given the proposed new minor changes to the refueling window, Dime tower height, platform for helicopter landings and use of internal fuel delivery systems. The current and past environmental concerns, interests, and resource values are the same as those analyzed in previous EA's.

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?*

There is no new information in terms of western arctic caribou herd migrations, T&E species, known cultural resources, or invasive species or population dynamics of area villages that would substantially change an analysis of the proposed modifications.

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 from adding 10 feet to one microwave site, increasing the window refueling, adding helicopter landing platform, or utilizing an internal fuel delivery system to the existing Terra Yukon EA or Terra NW EA would not change the direct, indirect, and cumulative effects as described in the existing NEPA documents. Flight timing would change slightly. However, the impacts of such timing changes on wildlife resources have been reduced within the existing NEPA documentation in terms of minimum altitude of flights and landing protocols if wildlife is in the vicinity of the proposed towers. Regarding effects from cultural resources, while the area has not been surveyed for cultural resources, a Programmatic Agreement is in place for this project, that describes the process to identify and mitigate potential effects to cultural resources.

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

The BLM conducted outreach to the most affected villages in the Terra Yukon EA. The BLM, the proponent, and URS personnel travelled to Koyukuk and Galena and held public meetings. Further, a programmatic NHPA Section 106 agreement is was signed. Outreach to tribal, and city governments was completed in the development of the programmatic agreement. The State of Alaska issued a letter of concurrence in the development of the Terra Yukon project with sites

located on State selected land. The Terra Yukon EA was posted on BLM's web site for 30 days and no public comments were received. Also, the EA documents for Terra Northwest and Terra Southwest were also posted on the web site and public outreach conducted. The Terra broadband network has been very well received by communities as for the first time in history, broadband has been made available which has increased the speed and reliability of the internet in Northwest Alaska.

### **E. PERSONS, AGENCIES, AND BLM STAFF CONSULTED**

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.

Bruce Seppi	Wildlife Biologist, BLM
April Rabuck	Planning and Environmental Coordinator, BLM
Tom Sparks	Associate Field Manager, BLM
Jenny Blanchard	Archeologist, BLM
Laurie Thorpe	Ecologist, BLM

### **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 identified in Part C of this DNA Worksheet fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

/s/ Alan Bittner

7/21/2016

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Alan Bittner  
Anchorage Field Office Manager

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 § 4 and the program-specific regulations.