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National Nuclear Security Administration

NEPA Compliance Review Addendum for Proposed Modifications to the Security Perimeter Project At Los Alamos National Laboratory

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Introduction

In March 2004, DOE/NNSA issued a NEPA Compliance Review **(DOE 2004)** concluding that proposed changes to the Security Perimeter Project at Los Alamos National Laboratory were within the bounds of the *Environmental Assessment for Proposed Access Control and Traffic Improvements at Los Alamos National Laboratory Los Alamos, New Mexico* (DOE/EA-1429) **(DOE 2002b)**. Further changes have been proposed since that time and these require a subsequent NEPA review.

Council on Environmental Quality regulations at Title 40, Section 1502.9 (c) of the Code of Federal Regulations **(40 CFR 1502.9[c])** require federal agencies to prepare a supplement to an EIS when an agency makes substantial changes in the proposed action that are relevant to environmental concerns, or there are circumstances or information relevant to concerns and bearing on the proposed action or its impacts. DOE's NEPA Implementing Regulations state: "When it is unclear whether or not an EIS supplement is required, DOE shall prepare a Supplement Analysis." **(10 CFR 1021.314(c))**, and, also, with regard to programmatic NEPA documents, "DOE shall evaluate site-wide EAs by means of an analysis similar to the Supplement Analysis to determine whether the existing site-wide EA remains adequate, whether to prepare a new site-wide EA, revise the FONSI, or prepare a site-wide EIS, as appropriate" **(10CFR1021.330(e))**. In this case, several of the EAs and FONSIs under consideration are both programmatic and site-wide in nature; this NEPA compliance review addendum will therefore be similar to a Supplement Analysis in scope.

Recent Security Perimeter Project modifications proposed would alter some aspects of the original Security Perimeter Project as it was described in the EA-1429 and subsequently revised in the March 2004 NEPA Compliance Review. Specifically, this project would relocate the proposed access control station near the intersection of West Jemez Road (also known as State Road 501) with State Road 4 to a location just east of the intersection of West Jemez Road and Camp May Road (also locally known as the Ski Hill Road). The Pajarito Road access control stations would remain in operation as previously analyzed in EA-1429. The proposed modifications to this project are shown in **Figure 1. Figure 2** shows the previously proposed location of the West Jemez Road Access Control Station.

Background

LANL has been implementing more restrictive access control measures since the tragic events of September 11, 2001. In recognition of this increased and changing threat, NNSA has determined that there is an immediate and critical need to upgrade physical protection at LANL around critical assets located within the core of the site.

Figure 1. Proposed West Jemez Road Access Control Station location at Camp May Road intersection.

Figure 2. Previously analyzed location of the West Jemez Road Access Control Station

Proposed Action

This proposed action would modify one aspect of the Security Perimeter Project previously analyzed in the NEPA Compliance Review **(DOE 2004)**, and in the *Environmental Assessment for Proposed Access Control and Traffic Improvements at Los Alamos National Laboratory Los Alamos, New Mexico* (DOE/EA-1429) **(DOE 2002b)**.

Access Control Stations – The West Jemez Road access control station would be relocated from the previously analyzed area near the intersection with NM 4 to the intersection with Camp May Road. There would be two guard posts, three lanes entering, and a two-lane bypass around for outbound traffic. The roadway cross-section would be between 80-90 feet wide. There are no additional changes to the other previously analyzed access control stations proposed.

Review of Applicable EAs

Six environmental assessments for LANL actions completed during the past eight years by DOE and NNSA were identified as potentially having relevance with regards to analyzing the impacts of these proposed changes to the Security Perimeter Project. These EAs were reviewed to determine whether potential impacts that could result from implementing the proposed modifications to the Security Perimeter Project as it was identified in EA-1429 were either already addressed or would be bounded by these prior analyses. These six EA's are:

DOE/EA-1429: Environmental Assessment for Proposed Access Control and Traffic Modifications at Los Alamos National Laboratory, Los Alamos, New Mexico (DOE 2002a) This EA analyzed the construction of eastern and western bypass roads around TA-03 and the installation of vehicle access controls and related modifications to enhance security along Pajarito Road and within the LANL core area. The NNSA issued a FONSI for these proposed site modifications on August 23, 2002. A Supplement Analysis was completed in February 2003 to analyze a revised design that did away with the proposed east and west bypass roads (**DOE 2003a**). A subsequent NEPA Compliance Review was issued in March 2004 (**DOE 2004**). This revision proposed relocating the access control station on West Jemez Road near West Road to the intersection of West Jemez Road and NM 4.

DOE/EA-1431: Environmental Assessment for the Proposed Trails Management Program at Los Alamos National Laboratory, Los Alamos, New Mexico (DOE 2003b)
This EA analyzed the proposed implementation of a Trails Management Program at LANL to address LANL trails use by the public, LANL workers, and officially invited guests. A FONSI was issued for this proposed program establishment on September 2, 2003.

DOE/EA-1407: Environmental Assessment for the Proposed TA-16 Engineering Complex Refurbishment and Consolidation at Los Alamos National Laboratory,

Los Alamos, New Mexico (DOE 2002b) This EA analyzed a proposed action to construct and operate offices, laboratories, and shops within the TA-16 engineering complex where Engineering and Science Applications (ESA) Division operations would be consolidated from other locations at LANL. NNSA issued a FONSI for the Proposed Action also on April 23, 2002.

DOE/EA-1376: Environmental Assessment for the Proposed Construction and Operation of a New Interagency Emergency Operations Center at Los Alamos National Laboratory, Los Alamos, New Mexico (DOE 2001) This EA analyzed the potential impacts of constructing and operating a new 30,000 square-foot (2,700-square-meter) Interagency Emergency Operations Center at LANL's TA-69. NNSA issued a FONSI for the proposed action on July 26, 2001.

DOE/EA-1329: Environmental Assessment for the Wildfire Hazard Reduction and Forest Health Improvement Program at Los Alamos National Laboratory, Los Alamos, New Mexico (DOE 2000) The Proposed Action (the No Burn Alternative) of this EA, which was issued together with a FONSI on August 10, 2000, consists of implementing a Wildfire Hazard Reduction and Forest Health Improvement Program at LANL.

DOE/EA-1212: Environmental Assessment for Lease of Land for the Development of a Research Park at Los Alamos National Laboratory, Los Alamos, New Mexico (DOE 1997) This EA analyzed the potential impacts of leasing 60 acres and developing approximately 30 acres located on the north side of TA-03 between West Jemez Road and Los Alamos Canyon as a research park for private sector use. A FONSI was issued by NNSA on October 7, 1997.

Potential Consequences of Proposed Project Modifications

This section addresses the potential environmental effects of the proposed modifications to the West Jemez Road access control station and compares potential impacts from implementing this change with the impacts to resources previously analyzed. **Table 1** compares the potential environmental consequences to resources resulting from the proposed modifications to the Security Perimeter Project with EA-1429 and the other applicable EAs previously mentioned.

Land Use: The relocation of the proposed West Jemez Road access control station would not affect land uses in TA-03, TA-16 and along West Jemez Road, the EOC, or the area around the Research Park. No land within the Research Park would be used for road construction, and the access restrictions that would be established at LANL, while possibly inconvenient for Research Park users, would not be expected to disrupt legitimate business activities conducted there. Access to the Research Park would be preserved using the existing driveway opposite Casa Grande Drive. The use of popular recreational lands at Camp May and the Pajarito Mountain Ski Area would continue unchanged but subject to security controls dictated by national and local security conditions.

Visual Resources: The relocation of the proposed West Jemez access control station would have less of an impact upon visual resources because it would no longer be placed near NM 4 so it would be less visible to travelers using NM 4 coming to or from Bandelier National Monument via the Valles Caldera and Jemez Mountains. The proposed access control station would be constructed to appear compatible to the surroundings in accordance with LANL's Site and Architectural Design Principles **(DOE 2002c)** and it would be sited in the forest that was already thinned as reviewed in EA-1329.

Noise: The proposed modifications would locate the proposed West Jemez Road access control station away from the public campground operated by Bandelier National Monument near SR 4. It would not result in more noise impacts than analyzed in EA-1429 because there would be no construction and operation of the bypass roads across canyons that are Areas of Environmental Interest. There would be a temporary short-term increase in noise generated on West Jemez Road near Camp May Road during construction. There would be less total short-term noise resulting from construction activities because fewer structures would be demolished and less earth-moving equipment would be used than was proposed and analyzed in EA-1429.

Table 1. Potential Environmental Consequences of Proposed Modifications to the Security Perimeter Project compared to EA-1429 and other relevant EAs.

Resource	Environmental Consequences
Land Use	Less effect upon resource.
Visual Resources	Less effect upon resource.
Noise	Less effect upon resource.
Geology	Less effect upon resource.
Soils	Less effect upon resource.
Surface Water Quality	Less effect upon resource.
Groundwater Quality	Less effect upon resource.
Air Quality	Less effect upon resource.
Public Health	No change to resource projected.
Environmental Justice	No change to resource projected.
Socioeconomics	No change to resource projected.
Cultural Resources	No additional impacts.
Waste Management	Less effect upon resource.
Biological Resources	Less effect upon resource.
Transportation and infrastructure	Changes to local and regional traffic patterns would depend upon security levels.

Geology: The relocation of the proposed West Jemez access control station would have no effect upon local geology. Seismic activity would be less of a concern than analyzed in EA-1429 since there would not be any canyon crossing structures built.

Soils: Soils would not be disturbed near the intersection of NM 4 and West Jemez Road to build the station as previously proposed at that location. Less soil would be disturbed since the access control station at the intersection of NM 4 and West Jemez Road would not be constructed. The proposed modifications to the Security Perimeter Project would have no effect upon soils beyond what was analyzed in EA-1429 or the other five related subject EAs.

Surface Water Quality: The proposed West Jemez/Camp May access control station location would have less of an effect upon surface water quality than analyzed in EA-1429. There would be less potential for erosion and sedimentation since TA-03 bypass roads and canyon crossings would not be constructed as part of the Security Perimeter Project.

Groundwater Quality: The relocation of the proposed West Jemez/Camp May access control station would have less of an effect upon groundwater quality than analyzed in EA-1429. There would be less potential for pollution of groundwater since the bypass roads and canyon crossings would not be constructed as part of the Security Perimeter Project and there would be less paving.

Air Quality: The relocation of the proposed West Jemez/Camp May access control station would reduce the amount of construction and demolition and have less effect upon air quality than analyzed in EA-1429. There could be some minor and localized affect on air quality as a result of queuing if vehicles idle waiting to pass through the station during periods of heightened security screening. However, there would be no affect upon air quality as analyzed in EAs for the EOC, TA-16 or the Research Park. There would be fewer air emissions associated with construction since the bypass roads and canyon crossings would not be constructed and fewer buildings would be demolished as part of the Security Perimeter Project.

Public Health: The relocation of the proposed West Jemez Road access control station would have no more effect on public health than previously analyzed in EA-1429 or related EAs because there would be less potential for accidents with fewer demolitions and without constructing canyon crossings.

Environmental Justice: The relocation of the proposed West Jemez Road access control station would have no more effect on low income and minority populations subject to environmental justice considerations than previously analyzed in EA-1429 or the five related subject EAs.

Socioeconomics: The relocation of the proposed West Jemez Road access control station would have no more effect upon socioeconomics than previously analyzed in EA-1429 or the five related subject EAs. The LANL area transportation system would remain intact

and still serve the County of Los Alamos, and the surrounding region without long-term disruption, except when more stringent security screening required more rigorous access controls, or closure of West Jemez Road to non-LANL traffic.

Cultural Resources: The relocation of the proposed West Jemez Road access control station would create no additional impacts to those previously analyzed in EA-1429 or related EAs. All locations proposed for project area modifications have been previously surveyed for cultural resources. It is possible that new archeological sites would be discovered as construction proceeds. If new cultural resources were identified during construction and soil disturbance activities, site work in the vicinity of the discovery would stop until the discovered cultural resources could be assessed. NNSA would hold consultations with the SHPO and with the Pueblos as necessary with regard to further actions. A site data recovery plan, if necessary, would be prepared that would specify mitigation actions for these sites. A Memorandum of Agreement for resolution of adverse effects would be prepared following SHPO concurrence on the NRHP eligibility assessment, and the data recovery plan would be implemented. The Advisory Council on Historic Preservation would be notified of the Memorandum of Agreement and would have an opportunity to comment. No further project disturbance of any sites would occur until NNSA would prepare and implement the data recovery plan for mitigation of adverse effects.

Waste Management: The relocation of the proposed West Jemez Road access control station is bounded by the proposal previously analyzed in EA-1429 and related EAs. Specifically, there would be considerably less construction debris generated by the Project because there would be less cutting and filling and no need to build bridges across either Sandia or Mortandad Canyons. No major structures would need to be demolished. The volumes of contaminated soils and vegetation that would require removal would also be less.

Biological Resources: The relocation of the proposed West Jemez Road access control station would have less impact on biological resources than analyzed in EA-1429 because the Western and Eastern bypass roads would not be constructed through areas of environmental interest. There is a 100-year floodplain in the first culvert crossing to the south of the Camp May/West Jemez Intersection, which would be avoided. No additional tree thinning would be required for any trees larger than 8 inches in diameter. There would be no affects on Mexican spotted owl habitat.

Transportation and infrastructure: The proposed relocation of the West Jemez Road access control station near Camp may Road would have the same effect upon the intersection of Diamond Drive with Jemez Road as previously analyzed. That intersection would still be redesigned so that the two streets do not intersect and vehicles would no longer be able to access TA-03 without first passing through an access control point. There would still be pedestrian and bicycle connectivity from the Los Alamos town site to TA-03 and beyond. Connectivity within TA-03 would be better since Casa Grande, Pajarito and Bikini Atoll would not need to be closed as analyzed in EA-1429. The general public would be allowed to use West Jemez Road between Diamond Drive and

Camp May Road subject to prevailing national and local security conditions. West Jemez Road between Diamond Drive and Camp May Road could be restricted to use by LANL badge holders at certain times. Since Sept. 11, 2001, such restrictions have occurred approximately 1%-2% of the time. Under elevated security conditions, access to the site by the general public and some employees could be restricted. During such times, there could be a decrease in traffic on West Jemez Road and this could reduce congestion and conflicts at the intersections used by LANL workers to access TA-8, -16 and other area TAs. Closing West Jemez Road to unrestricted public access would not affect access or operations at the Emergency Operations Center. Utilities for the West Jemez Road access control station would be installed or modified in accordance with LANL engineering and environmental standards, and construction would be sequenced in order to avoid service disruptions where utilities need to be relocated or removed.

Conclusion

This analysis has compared the potential environmental consequences to resources that would result from implementing the proposed modifications to the Security Perimeter Project with EA-1429 and the five other applicable subject EAs previously identified. In all cases, the consequences would likely be less than previously analyzed and therefore are bounded by EA-1429 and the other applicable EAs. The proposed modifications would not result in changes to affected resources that exceed what has previously been analyzed and determined to have no significant impacts. Therefore, a new EA is not required.

FINDING: The United States Department of Energy, National Nuclear Security Administration finds that the environmental effects of the newly proposed modifications to the Security Perimeter Project are adequately bounded by the analyses of impacts projected by previous DOE environmental assessments DOE/EA-1439, 1429, 1407, 1376, 1329, and 1212, and no new EA is required. The Department of Energy, National Nuclear Security Administration makes this Finding pursuant to the National Environmental Policy Act of 1969 [42 U.S.C. 4321 et seq.], the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act [40 CFR 1500] and the Department of Energy National Environmental Policy Act Implementing Procedures [10 CFR 1021].

Signed in Los Alamos, New Mexico this 18th day of April, 2005

Edwin L. Wilmot, Manager
Los Alamos Site Office

References

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