

NEPA DETERMINATION

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

For Notice to Proceed Approval of Strategic Reconfiguration of Electrification and Control System Automation Pump Station 9 of the Trans-Alaska Pipeline System PLMP 549

DNA AK-993-06-005

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

A. BLM Office: Joint Pipeline Office

BLM Case File No. FF012505
and AA005847

Authorities: The Trans-Alaska Pipeline Authorization Act, 43 Code of Federal Regulations 2880 Rights-of-Way Under the Mineral Leasing Act; National Environmental Policy Act (NEPA) of 1969; Federal Agreement and Grant of Right-of-Way for the Trans-Alaska Pipeline System.

Applicant: Alyeska Pipeline Service Company, P.O. Box 196660, MS 502, Anchorage, AK 99519-6660

Proposed Action: Alyeska Pipeline Service Company, as operator of the TAPS has submitted a Notice to Proceed application for BLM approval as part of an overall strategic reconfiguration project of the pump stations along TAPS. The Notice to Proceed application consists of installation of new modules to accommodate the change from turbine driven pumps to electric engine pumps at Pump Station 9. Work will mainly consist of mechanical and electrical installations for the strategic reconfiguration of this pump station. Subsequent Notice to Proceed applications will be submitted to BLM in addition to the ones addressed in this DNA for future strategic reconfiguration projects as proposals are submitted to the Joint Pipeline Office. Separate DNA documents will address future Notice to Proceed submissions.

Purpose of Action: The purpose of strategic reconfiguration of the pump stations along TAPS is the continued improvement of the operation and maintenance of TAPS. Alyeska proposes reconfiguration will simplify and streamline operations and maintenance along TAPS and reduce overall costs of operation and extend the life of the pipeline. The purpose of this project is to prepare Pump Station 9 for the change from turbine-driven pumps to electric driven pumps. To accomplish this, Alyeska must install modules and equipment to accommodate this change.

Location of Proposed Action: The location of the proposal is at Pump Station 9, Pipeline Milepost 549 along TAPS. All of the proposed work will be within the existing TAPS Right-of-Way.

Legal Land Description: T. 11 S., R. 10 E., Section 27, SE1/4, Copper River Meridian, Alaska.

Description and Scope of Work for Proposed Action:

The general scope of work includes installation of modules for the mainline pump, header, re-circulation, control, backup generator, fuel tank skid, pump shed, and fuel tank containment. It also includes installation of piping, electrical cable trays and structures between modules, equipment and tanks and the tie-in points east of the existing pump building at Pump Station 9. Included in the scope of work are all the interconnecting piping, cable, and cable tray within these modules between the shipped loose components. Alyeska plans to grade the site and prepare the site for proper drainage before installation.

The following electrical work installations will be conducted inside the remaining buildings:

- Miscellaneous foundations such as stair pads and diesel fuel pump shed and tanks.
- Cable tray supports on the exterior of existing buildings.
- Balance of the cable tray to complete all cable tray systems.
- Cable tray penetrations into existing buildings and complete cable tray tie-ins.
- Trenching and cables as required for underground cable feeds.
- Telecommunication and control cabling.
- All cabling between the modules.
- Balance of cabling to field devices, equipment and structures.
- All heat tracing and insulation of piping.
- Balance of gas detectors in the existing process buildings.
- Balance of fire detection panels and alarming devices in the existing buildings.
- Complete upgrades to existing Halon system.
- New site security system components on existing buildings and site facilities.
- Heated enclosures for instruments and valves.
- All instrument hot taps.
- Balance of hot taps and piping.
- Balance of new instrumentation and field junction boxes.
- Replace relief valve actuators.
- Diesel fuel tanks, pumps and piping.

All work will be coordinated with TAPS pipeline operations. Demolition and removal of out of service facilities will be completed after the above work is completed, except where demolition is required to make room for new equipment. No demolition work that will subject the pumping facilities to pumping disruption will be allowed under this proposal, unless approved in advance by an Alyeska representative.

This proposal does not include commissioning or energizing of any of the equipment which is being installed. The commissioning and energizing of this equipment is part of a cut-over process to the existing energized facility and this process will be managed separately by Alyeska.

All pre-commissioning activities that are required to validate the acceptable mechanical completion of the facilities will be part of this work scope.

All work will be completed inside of the pump stations within the existing federal right-of-way on previously disturbed ground, and therefore will not increase the footprint for environmental impact purposes.

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

The project activity will occur on privately owned lands adjacent to lands managed by BLM Alaska, which were withdrawn as a utility corridor under Public Land Order 5150. The relevant planning documents are the *BLM Utility Corridor Resource Management Plan* (RMP) approved in 1991 and the *BLM Southcentral Resource Management Plan* approved in 1982. The proposed action is in conformance with the applicable land use plans as required by 43 CFR 1610.5, even though this project is not specifically provided for because it is clearly consistent with the objectives in the land use plan decisions.

C. Applicable NEPA Documents and Other Related Documents

1) *Environmental Assessment of the Proposed Reconfiguration of the Trans-Alaska Pipeline System*, U.S. Department of the Interior, Bureau of Land Management, EA-03-009, January 2004. (EA, BLM 2004)

2) *Final Environmental Impact Statement, Renewal of the Federal Grant for the Trans-Alaska Pipeline System Right-of-Way*, U. S. Department of the Interior, Bureau of Land Management Joint Pipeline Office, BLM-AK-PT-03-005-2880-990, November 2002.

In 2002, the U.S. Department of Interior, Bureau of Land Management (BLM) completed a Final Environmental Impact Statement (FEIS) that identified and analyzed the probable direct, indirect, and cumulative environmental impacts associated with renewal of the TAPS Right-of-Way. The FEIS and the Record of Decision stated there were no probable significant adverse environmental impacts from the TAPS Right-of-Way authorization and continued operation and maintenance along TAPS for an additional 30 years. The FEIS also stated that excavations of buried pipe would result in reductions and prevention of corrosion to the mainline pipe, and that an estimated 15 digs would occur each year, potentially increasing to 20 per year by 2034.

3) *Final Environmental Impact Statement, Proposed Trans-Alaska Pipeline, Prepared by a Special Interagency Task Force for the Federal Task Force on Alaskan Oil Development*, U.S. Department of the Interior, 1972.

In 1972, the U.S. Department of Interior completed a Final Environmental Impact Statement (FEIS) that identified and analyzed the probable direct, indirect, and cumulative environmental impacts associated with the construction, operation and maintenance of the Trans-Alaska Pipeline System for the first 30-year term of the Right-of-Way Grant. The Record of Decision stated there were no probable significant adverse environmental impacts from the TAPS Right-of-Way authorization and continued operation and maintenance along TAPS. This was the first

comprehensive NEPA analysis document completed for the Trans-Alaska Pipeline System and the first EIS completed after passage of the National Environmental Policy Act in 1969.

C. NEPA Adequacy Criteria

1. Are the current proposed actions substantially the same actions or part of those actions as previously analyzed?

The proposed actions are part of the actions that were previously analyzed in the *Environmental Assessment of the Proposed Reconfiguration of the Trans-Alaska Pipeline System*, U.S. Department of the Interior, Bureau of Land Management, EA-03-009, January 2004, Sections 2.1.2.1, Pump Station Electrification and Section 2.1.2.5, Description of New Equipment. The EA expanded and summarized the information presented in the TAPS FEIS and incorporates by reference the relevant analysis and conclusions in order to avoid duplication. The EA states:

The level of confidence in identifying the probable environmental impacts is reasonable because 1) the project under analysis is only a component piece of normal TAPS operations and maintenance, which already exists with known, observable impacts, 2) all of the proposed reconfiguration activities would occur within the TAPS Right-of-Way, 3) most aspects of the reconfiguration would only affect operations within structures, and 4) the long-term effects on the environment from the planned upgrades would largely be beneficial.

All of the proposed actions will occur within the existing federal right-of-way on previously disturbed lands.

2. Is the range of alternatives analyzed in the existing NEPA documents appropriate with respect to the current proposed actions, given current environmental concerns, interests, resource values, and circumstances?

The range of alternatives analyzed in the *Environmental Assessment of the Proposed Reconfiguration of TAPS* (BLM 2004) is appropriate with respect to the current proposed actions. Two alternatives were evaluated in the EA, 1) the proposed reconfiguration action, and 2) no action. As stated in the EA, the reconfiguration of TAPS as envisioned modifies the pump station infrastructure, but does not modify the mainline pipe outside the pump station boundaries. The proposal does not change the overall footprint of the pump stations or pipeline system.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances, for example, most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

The existing analyses and conclusions are adequate, as no new listings of threatened, endangered, proposed, or candidate species have occurred since the January 30, 2004 completion of the *Environmental Assessment of the Proposed Reconfiguration of TAPS*. Both the TAPS

FEIS for Renewal and The *Environmental Assessment of the Proposed Reconfiguration of TAPS* (BLM 2004) contain interagency reviews by the National Marine Fisheries Service and U.S. Fish and Wildlife, Alaska Region. Both agencies stated the proposed pump station reconfiguration would not incur adverse impacts to listed species during the environmental assessment process.

4. Does the methodology and analytical approach used in the existing NEPA documents continue to be appropriate for the current proposed actions?

The methodology and analytical approach used in the *Environmental Assessment of the Proposed Reconfiguration of TAPS* (BLM 2004) is appropriate for the current proposed actions. The EA addressed the aspects of the affected environment and environmental consequences for soils, permafrost, sand and gravel; surface water and groundwater resources, air quality, noise, terrestrial vegetation, wetlands and riparian zones; fish, birds, mammals, threatened and endangered species, land use, economy, subsistence, environmental justice, cultural resources, recreational and visual resources, transportation, hazardous materials and waste management, and oil spill contingency plans. The EA systematically addressed cumulative impacts, mitigation and other NEPA considerations. This proposal is within the scope of the methodology and analysis stated in the EA.

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

The direct and indirect impacts of the current proposed action do not deviate from the impacts identified in the existing NEPA documents. Site-specific impacts related to the current proposal were sufficiently analyzed in the previous EIS's.

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 documents?

The cumulative impacts from the proposed actions have not changed substantially from the impacts analyzed in the TAPS FEIS (BLM 2002) and the *Environmental Assessment of the Proposed Reconfiguration of TAPS* (BLM 2004). The TAPS FEIS for Right-of-Way Renewal contains an extensive discussion of the cumulative effects of TAPS operations for the 30-year renewal period, and addresses reconfiguration of the pipeline pump stations.

7. Are the public involvement and interagency reviews associated with existing NEPA documents adequate for the current proposed actions?

The public involvement and interagency review associated with the existing NEPA documents are adequate for the current proposed action due to the following:

1) Public Involvement. The TAPS FEIS for Renewal underwent an exhaustive public involvement process. BLM enlisted all interested stakeholders in the renewal process, including government-to-government involvement with Alaska tribes, state and federal agencies that

regulate TAPS activities, and special interest groups affected by TAPS activities. The entire renewal process, including all public hearings and meetings received extensive coverage by newspaper, television and radio media.

The JPO-BLM Authorized Officer determined a 30-day public review period was not necessary before finalizing the Finding of No Significant Impact (FONSI) as a follow-up to the *Environmental Assessment of the Proposed Reconfiguration of TAPS* (BLM 2004). Public review is necessary 1) when there is reasonable argument for preparation of an EIS, 2) if the proposal is a new action or a first intrusion of development into a pristine area, 3) when the proposal is similar to one which normally requires preparation of an EIS (CFR Sections 1501.4(e)(2) and 1508.27). The EA on Reconfiguration did not meet these criteria, therefore the decision was made to finalize the FONSI and make both NEPA documents available to the public via Internet access and by public reading room distributions around the state of Alaska.

2) Interagency Review. During the TAPS Renewal EIS process, BLM coordinated closely with the State of Alaska, as well as all JPO State and Federal stakeholder agencies and other Federal land management agencies, including the U.S. Forest Service and the National Park Service. Both the TAPS FEIS for Renewal and The *Environmental Assessment of the Proposed Reconfiguration of TAPS* (BLM 2004) contain interagency reviews by the National Marine Fisheries Service and U.S. Fish and Wildlife, Alaska Region. Both agencies stated the proposed pump station reconfiguration would not incur adverse impacts to listed species during the environmental assessment process.

D. Mitigation Measures: List the specific mitigation measures that were identified, analyzed, and approved in existing NEPA documents.

Section 4.4, Mitigation, of the 2004 Environmental Assessment on Reconfiguration states:

Mitigation measures discussed in the consequences analysis include elements to reduce impacts to surface water, habitats, birds, and mammals, and the consequences of spills.

1. APSC would reconfigure the pump stations without loss of additional wildlife habitat. All activities would occur in existing road rights-of-ways and within the current boundaries of the pump stations.
2. To prevent the risk of fire during a potential petroleum leak from the new equipment, the surface would be graded to guide any liquids not captured by the sump system away from the pump modules. However, impermeable secondary containment for the new pump modules would be installed to facilitate cleanup and prevent migration of petroleum products from reaching surface and groundwater.
3. Alternative means of sanitary waste disposal would be employed for any periods of time during construction when sanitary waste production by the workforce would exceed on-site treatment capacity. If stack injection is no longer possible at Pump Stations 1 and 4, sanitary wastes would be hauled to treatment facilities at Prudhoe Bay (PS-1) or Fairbanks (PS-4) for treatment.

4. Dust abatement practices would be followed during construction activities.
5. Activities that could potentially disturb nesting migratory birds at the pump stations, or migratory birds and threatened and endangered species in the vicinity of the pump stations, would be timed to avoid nesting periods. APSC would continue to implement procedures that would reduce interactions or conflicts between station operations and wildlife, including both small and large mammals.
6. APSC is developing a project-specific management of change plan for implementation of the strategic reconfiguration. This plan will address the steps necessary to minimize risks associated with non-routine operations during the transition phase from construction to operations.
7. BLM and the Alaska Department of Environmental Conservation (ADEC) have approved the amendments to the TAPS Oil Spill Contingency Plan (C-Plan) with several conditions, including application of the Fate and Transport Study procedure line-wide. To facilitate a holistic analysis of response capability and effective strategies, the BLM is developing an internal database available to all JPO agencies to identify resources at particular risk from oil spill impacts as well as response resources identified in the C-Plan. BLM approval of the C-Plan requires 1) a heavier lift helicopter for PS5, 2) Impermeable secondary containment for the new pump modules, 3) A drill/exercise plan to emphasize any changes in response procedures, and 4) Submission of a management of change plan prior to implementing major relocations of personnel.

OTHER NEPA CONSIDERATIONS

The Environmental Assessment states that unavoidable adverse impacts of strategic reconfiguration of the TAPS would be similar to those identified in the TAPS FEIS. It also states:

Impacts associated with the installation and modification of equipment on the existing pump stations would be predominantly negative, but short-term and local. Short-term, minor air quality and soils impacts would occur because of fugitive dust emissions from earth disturbances and transportation. Other short-term and minor impacts associated with pump station reconfiguration would include increases in water use, wastewater generation, noise, and hazardous and domestic waste production. Because of the localized nature of the activities, on and already developed site and the short duration of the activities, fish and threatened and endangered species would not be impacted. Birds and mammals using the pump stations as habitat would be disturbed during construction activities. Cultural resources and land use would not be affected. Short-term slight increases in impacts on visual resources may occur during reconfiguration activities. Delivery of equipment, transportation of the workforce, and removal of wastes would have a minor and short-term impact on traffic on adjacent highways. Short-term positive socioeconomic impacts would occur, as more jobs would be needed during installation and modification of equipment and during transition.

However, air emissions, water use, and waste generation would be reduced in the long term. Equipment and facilities removed during strategic reconfiguration would be recycled to the extent practicable, thus reducing an irretrievable and irreversible commitment of resources. More efficient equipment at the reconfigured pump stations would reduce the use of fossil fuel. Strategic reconfiguration of the TAPS would result in short-term increases in adverse impacts due to construction, however reconfiguration would result in future long-term reductions in TAPS operational impacts.

ANILCA Section 810 Subsistence Evaluation – The TAPS Renewal Record of Decision signed January 8, 2003 contained the following:

BLM determined that the effect of the proposed action on subsistence would not significantly restrict subsistence uses. BLM undertook a series of public hearings to review the effects of the TAPS on subsistence and published a notice in the Federal Register July 5, 2002, that cumulative impacts may significantly restrict subsistence uses. BLM held public hearings throughout Alaska in Cordova, Valdez, Glennallen, Anchorage, Fairbanks, Minto, and Barrow, between July 26 and August 9, 2002. Based on the hearings and the Section 810 evaluation, BLM concluded:

- 1) TAPS Renewal would not significantly affect the subsistence rights of rural Alaskans. Some small or slight impacts might occur under a renewal for thirty years. The subsistence impacts likely related to the TAPS potentially would be (1) limited reduced access to portions of subsistence use areas and (2) possible disruptions to the movement of game. It is likely that the magnitude of these consequences would be very small, and would not significantly restrict subsistence uses.
- 2) Since the TAPS is constructed and is an operational system, there is no other land available to accomplish the purpose sought to be achieved. The proposed action will involve the minimal amount of public lands necessary to accomplish the purpose of renewing TAPS.
- 3) There is no other alternative that would reduce or eliminate the use of public lands needed for subsistence purposes and accomplish the public purpose.

Environmental Impacts – The January 2003 Record of Decision for TAPS Renewal authorized renewal of the right-of-way under the administration of the Department of the Interior with the understanding that the monitoring and mitigation that is currently required and operative shall be followed as directed by the Authorized Officer. Mitigation measures include those covered by technical, environmental, and general stipulations of the Federal Agreement and Grant of Right-of-Way. The FEIS stated:

“The unavoidable adverse impacts under the renewal of the Grant for another 30 years are small and may be mitigated or offset by the positive aspects of the actions. There would be continued localized impacts to the environment as a result of operation, construction, and maintenance activities, such as soil and vegetation disturbances, the use of surface and groundwater resources, and air emissions. However such impacts are readily mitigated through measures already in place.”

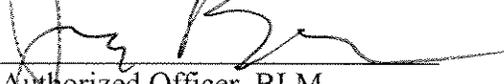
RECORD OF DECISION

CONCLUSION – NEPA DETERMINATION

Based on the review documented above and the requirements of the National Environmental Policy Act, I conclude the existing BLM NEPA documentation fully covers the proposed action and the actions are within the scope of all existing NEPA documents listed above in Section B.


Preparer, Realty Specialist, BLM
Joint Pipeline Office

3/3/06
Date


Authorized Officer, BLM
Joint Pipeline Office

3-3-06
Date