PROJECT/ACTIVITY TITLE: Supplemental Environmental Projects: Low Impact Development	**Accession No: 22891 and 22892** **PRID No: 17P-0121 and 17P-0124**	**Date**: January 26, 2018
PURPOSE: Compliance with the 2016 Settlement Agreement between New Mexico Environment Department (NMED) and the Department of Energy (DOE) that stipulated the identification and completion of Supplemental Environmental Projects (SEPs) at Los Alamos National Laboratory (LANL).		
Location: See map below	**Project Contact**: Terrill Lemke, ADESH-EPC-CP, 665-2397, tlemke@lanl.gov Jaime Navarro, NA-LA, 667-1517, Jaime.Navarro@nnsa.doe.gov	
NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COVERAGE: Department of Energy National Environmental Policy Act Implementing Procedures 10 Code of Federal Regulations Part 1021, Appendix B to Subpart D of Part 1021—Categorical Exclusions Applicable to Specific Agency Action: *B1.33 Stormwater runoff control* Design, construction, and operation of control practices to reduce stormwater runoff and maintain natural hydrology. Activities include, but are not limited to, those that reduce impervious surfaces (such as vegetative practices and use of porous pavements), best management practices (such as silt fences, straw wattles, and fiber rolls), and use of green infrastructure or other low impact development practices (such as cisterns and green roofs).		

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BACKGROUND

In 2014, the NMED Hazardous Waste Bureau (HWB) issued compliance orders HWB-14-20 and HWB-14-21 for violations of the New Mexico Hazardous Waste Act. These violations stemmed from improper packaging of transuranic waste from LANL and disposed of at the DOE Waste Isolation Pilot Plant in Carlsbad, New Mexico. The resulting 2016 Settlement Agreement[1] between NMED and DOE stipulates that Supplemental Environmental Projects (SEPs) shall be completed.

Hydrological modification and resultant non-point source pollution are storm water management challenges that LANL faces today. All major drainages receiving waters within LANL boundaries are listed as impaired by the state of New Mexico for one or more pollutants. Much of the Laboratory was built well before modern storm water pollution regulations were enacted and associated technologies developed. A LANL Low Impact Development *(LID)* Master Plan is part of a strategic effort to address storm water management issues across the existing developed areas of the Laboratory and maintain compliance with multiple storm water permits and regulations.

DESCRIPTION OF PROPOSED ACTION

The DOE, National Nuclear Security Administration (NNSA), Los Alamos Field Office (Field Office), and Laboratory created a LID Master Plan to guide and prioritize future development of LID projects at the Laboratory. The LID Master Plan

[1] Settlement Agreement and Stipulated Final Order resolving Compliance Order NO. HWB-14-20 (CO), the February 14th incident at the DOE-owned Waste Isolation Pilot Plant. Accessed April 2017 at https://www.env.nm.gov/OOTS/documents/LANLSASFOFINAL1_22_16.pdf.

applies to developed areas across the Laboratory and focus on identifying opportunities for storm water quality and hydrological improvements in the heavily urbanized areas of Technical Areas 03, 35 and 53 (Figure 1). Initial projects from the LID Master Plan have been proposed. These include: Main Gate Entry Pond in TA-03 (17P-0121 the approach is to educate employees and visitors about green infrastructure, create vegetated infiltration opportunity to remove pollutants, and create an attractive node at the entrance gate.) and TA-03 Building 0028 (17P-0124 create an attractive and low maintenance feature. to use permeable surface, swale, control basins, filter basin). In addition to the LID Master Plan, the LID Standards are intended to provide guidance on planning, design, construction, and maintenance of LID described in the Master Plan or implemented at other LANL locations. That includes projects as small as repair of minor storm water erosion controls, retrofitting LID in developed areas, and storm water management associated with new development. The LID Master Plan and LIS Standards would allow the addition of LID projects for other technical areas, including but not limited to 18P-004 – Wellness Center, 18P-005 – TA03-0128 (Chicken Shack), and 18P-006 – TA03-Physics South Parking, as time and funds allow in the future.

Figure 1: Proposed Project Location

IMPACT ASSESSMENT

By design the Proposed Action is to mitigate and prevent long-term adverse environmental impacts. See Table 1 below for an assessment of potential impacts.

Table 1. Environmental Factors Checklist

Environmental Factor	Analysis
Land Use	No change to current conditions.
Visual	Low impact development activities would result in improvement to the viewshed.
Geology and Soils (geologic hazards, soil productivity, capability, erodibility, and mass failure)	Low impact development activities could result in improvement.
Non - radiological Air Quality	Minor generation of dust and engine exhaust during construction activities.
Radiological Air Quality	N/A
Noise	Heavy equipment would be used for construction/installation activities. Noise impacts would be temporary. There are no sensitive receptors in the area.
Ecological (floodplains, wetlands, threatened or endangered species and habitat, migratory birds, exotic organisms)	Low impact development activities could result in ecological improvement. There will be no negative effect.
Human Health – Radiological Impacts on the Public	N/A
Human Health – Chemical Impacts on the Public	N/A
Human Health – Worker Health	N/A
Cultural Resources (archeological and historical)	Landscaping modifications will not affect the historic integrity of buildings or any other nearby historic buildings. If there are cultural resources adjacent to the proposed work areas, prior to construction, cultural resources staff will mark these sites for avoidance. Runoff and drainage must be directed away from the archaeological site. There will be no effect to cultural resources.
Socioeconomics	Minor benefits from employment of the construction workforce.
Infrastructure (roads, utility corridors, communications systems, energy & fuels, distribution systems, and water)	No effect
Waste Management	No effect
Transportation	Traffic control would be in place during any construction activity.
Environmental Justice	N/A
Facility Accidents	N/A

Other SEPs are under consideration as independent actions. No SEP is dependent on the completion of any other SEP. However, to the extent practical all proposed SEPs have been reviewed in consideration of connected and cumulative

actions that could have individually insignificant but cumulatively significant impacts. No cumulative and significant impacts have been identified. It is important to note that all proposed SEPs are intended, and will be designed, to decrease long-term environmental impacts and have not and will not be segmented to meet the definition a categorical exclusion.

CONCLUSION

Based on this NEPA determination analysis, there are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects or threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders. Consequently, no further NEPA analysis is necessary or required.

NEPA Determination

Based on my review of the Proposed Action, as the National Nuclear Security Administration's Los Alamos Field Office (NA-LA) NEPA Compliance Officer (as authorized under DOE Policy 451.1), I have determined that the Proposed Action as described herein, falls within the DOE NEPA Implementing Procedures listed in 10 CFR Part 1021, Subpart D, Appendix B 10 CFR Part 1021, Appendix B to Subpart D of Part 1021—Categorical Exclusions Applicable to Specific Agency Actions: The categorical exclusion that applies is *B1.33 Stormwater runoff control.*

There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects or threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or executive orders. If changes are made to the scope of the action so that it is no longer bounded by the enclosed description, or the project is changed to encompass other actions, NEPA requirements for the action will need to be reassessed at that time and further analysis may be required.

NA-LA NEPA Compliance Officer:	**Date:**
Signature: [illegible], NCO	8/1/18