

**U.S. DEPARTMENT OF ENERGY
ROCKY FLATS FIELD OFFICE**

**Finding of No Significant Impact
Protected Area Reconfiguration Project
at Rocky Flats Environmental Technology Site**

SUMMARY

The Department of Energy (DOE) has proposed to consolidate Special Nuclear Material (SNM) in Building 371 to improve safeguards and security of SNM and to reduce baseline facility and personnel costs. If all SNM is consolidated in Building 371, maintaining the full 200-acre Protected Area (PA), would no longer be necessary. The PA could then be reconfigured by constructing a new fence to include only the protection requirements necessary for Building 371. DOE Environmental Assessment (EA) 1132 has been written to evaluate options for reconfiguration of the PA. The project to construct a new fence would not be needed if SNM is not consolidated in Building 371.

In light of the shrinking budget being allocated to the Rocky Flats Environmental Technology Site (Site) and the cost to maintain the current PA, DOE needs to provide security for SNM stored at the Site in a more cost-effective manner. Costs associated with required protective force coverage and security equipment maintenance could be decreased annually by an estimated \$25 million.

The Protected Area Reconfiguration Project EA addressed the potential environmental impacts resulting from construction of fence alternatives. The proposed action and alternatives differ with respect to location only, as the same engineering design criteria was utilized for all alternatives (other than the no action alternative). Possible routes for the new fence section were examined for environmental impact, feasibility, cost, and complexity. A number of the alternatives, including the proposed action, would impact wetlands.

PROPOSED ACTION

The proposed action consists of reconfiguring the security fence and systems to include only Building 371. The proposed action would modify the existing 200-acre PA by

constructing a length of fence east of Building 371 that would tie into the existing fence on the north and south side of Building 371, completely enclosing Building 371.

This alternative was investigated because it bypassed the 517/518 substation, impacted minimal wetlands, has a fairly straight-line and minimally intrusive configuration, and would facilitate meeting security requirements.

The proposed action has been designed to avoid and/or mitigate potential harm to wetlands. While the wetlands would be impacted, DOE would mitigate these effects. The wetlands affected by the proposed action would be .038 acre, less than 4/10s of a football field. Given wetlands impact, DOE will mitigate these effects through the Site Wetland Mitigation Bank Memorandum of Agreement being negotiated between the DOE, the Environmental Protection Agency, and the U.S. Fish and Wildlife Service. No additional impacts to water resources are anticipated.

The wetlands areas to be impacted by the proposed alternative have been defined as potential Preble's Meadow Jumping Mouse habitat, a Colorado Species of Special Concern and a federal Category 2 species. Trappings conducted in 1995, however, produced no capture of the species. As a consequence, no impacts to endangered or threatened species are anticipated.

Finally, as a result of Individual Hazardous Substance Site (IHSS) impacts, excavation and disposal of hazardous wastes may occur. Per Site procedures, sampling will be conducted prior to construction throughout the disturbed area of the PA Reconfiguration project, including the IHSSs. In addition, an on-site Soil Disturbance Permit will be issued prior to construction. Depending on the results of additional IHSS area sampling and the sampling conducted for the Soil Disturbance Permit, excavated soil that is removed from the project area may require management as regulated waste. Thus, an increase in hazardous or mixed waste could result from any of the action alternatives, but is not likely based on the Operating Unit investigations reports. Any soils disturbed within the IHSSs that are not associated with a contamination hot spot will remain there, eliminating the potential for spread of contamination. The no action alternative would have no impact on waste management issues at Rocky Flats.

ALTERNATIVES CONSIDERED

No Action Alternative (Alternative E)

The no action alternative would maintain the current 200-acre PA configuration. This option was considered as a baseline for assessing environmental impacts for other alternatives.

DOE considered the no action alternative, which would retain the current fence configuration around the 200-acre Protected Area. The no action alternative would have no additional environmental impact, but would cost an additional \$25 million per year (above the estimated cost of the proposed alternative) for security protection and maintenance of the current fence configuration. The no action alternative, therefore, was considered to be unacceptable as it does not meet the DOE objectives for reducing baseline costs of protecting SNM at Rocky Flats.

Other Alternatives Considered (Alternatives B, C, and D)

Other alternatives were considered and analyzed. Alternative B was investigated because of its close proximity to Building 371. This alternative would have consisted of a 40-foot secured zone with three fences. It would have required construction on a steep slope located close to Building 371. Alternative B was found to have no impact on wetlands, Preble's Mouse habitat, or IHSSs. Concerns, however, regarding slope stability and security, due to fence proximity to other structures, resulted in a recommendation to not construct at this location. The design problems could be overcome, but some of the security issues would have resulted in long-term cost implications.

Alternative C was investigated because it eliminated some of the security concerns identified in Alternative B. This alternative would have had identical fence and security equipment as the proposed configuration, but would have been located further west through the location of the existing electrical substation (Substation 517/518) and connecting with the existing fence. Alternative C would have wetlands impact (.020 acre), would impact potential Preble's Mouse habitat, and would impact identified IHSSs. In addition, this alternative would have required additional construction because of a need to relocate the substation. Large quantities of fill dirt would have been required. The cost

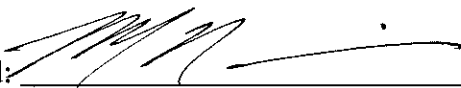
impact would be considerable: relocation of the substation would have added approximately \$7 million to the cost of this alternative.

Alternative D was investigated to avoid wetlands located further west of Alternative D. This alternative would also have consisted of the same fence and security equipment as the proposed action, but would have followed Sixth Street north. While Alternative D would have wetlands impact (.025 acre), it would not impact potential Preble's Mouse habitat. This alternative would impact identified IHSSs. Further, Alternative D would have required a relocation of four 115kV power poles and a replacement for Sixth Street would have had to be provided. The cost could have exceeded \$4 million more than the cost of the proposed action.

DETERMINATION

Based on the information gathered, data analyzed, and analyses conducted in preparation for the Protected Area Reconfiguration Project EA, the Department of Energy has determined that the proposed action to construct a fence around Building 371 at the Rocky Flats Environmental Technology Site does not constitute a major federal action which would significantly affect the quality of the human environment within the meaning of the National Environmental Policy Act of 1969. Therefore, preparation of an Environmental Impact Statement for the proposed action is not required.

DEPARTMENT OF ENERGY APPROVAL

Signed: 

Dated: 12/26/95

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