

**Floodplain Statement of Findings
for the Technical Area 8 to Technical Area 22
Natural Gas Line Replacement Project,
Los Alamos National Laboratory
Los Alamos County, New Mexico**

AGENCY: U.S. Department of Energy (DOE) National Nuclear Security Administration (NNSA),
Los Alamos Field Office

ACTION: Floodplain Statement of Findings

DESCRIPTION OF THE PROPOSED ACTION: The National Nuclear Security Administration (NNSA), a semi-autonomous agency within the U.S. Department of Energy (DOE), is proposing new construction that crosses through upper Pajarito Canyon and upper Starmer Canyon from Technical Area (TA) 8 to TA-22 at Los Alamos National Laboratory (LANL). The project proposes to install a new 12 inch HDPE natural gas line to replace the existing 70+ year old 12 inch bare steel natural gas line. Replacement will prevent loss of service to several LANL TAs and Bandelier National Monument. The project activities within the 100- year floodplains include new natural gas line installation to replace an existing aging gas line. The project also includes activities outside the floodplain including relocating a section of fence and three construction equipment and materials storage areas (Figure 1). It is a standard industry practice to abandon unused utilities in place. Removal increases project cost and would cause more overall environmental disturbance. For example, line removal would require building access roads through upper Pajarito Canyon.

LOCATION WITHIN A FLOODPLAIN EXPLANATION: Given that Gas Line Replacement Project is partially within the floodplain, there are no practical alternatives that would avoid an action within the floodplain.

ALTERNATIVES: The alternatives available to DOE/NNSA include the no action alternative. The no action alternative was not selected by DOE/ because the existing gas line is an over 70 years old bare steel pipe that has corroded and is leaking. The leaks present a loss of a resource, a safety risk to personnel and property, and a contributor to greenhouse gas. A second replacement route was proposed to follow the existing gas line but eliminated.

FLOODPLAIN PROTECTION STANDARDS: The proposed project would result in limited and minor direct and indirect impacts to the Pajarito and Starmer Canyons 100-year floodplains and would not result in adverse impacts to the floodplain values or functions. Temporary disturbance within the floodplain would cease following completion of installation activities. Best management practices would be implemented. This proposed project would not significantly modify flow paths within the floodplain from pre-project conditions to post project conditions. No effects to lives and property associated with floodplain modifications are anticipated.

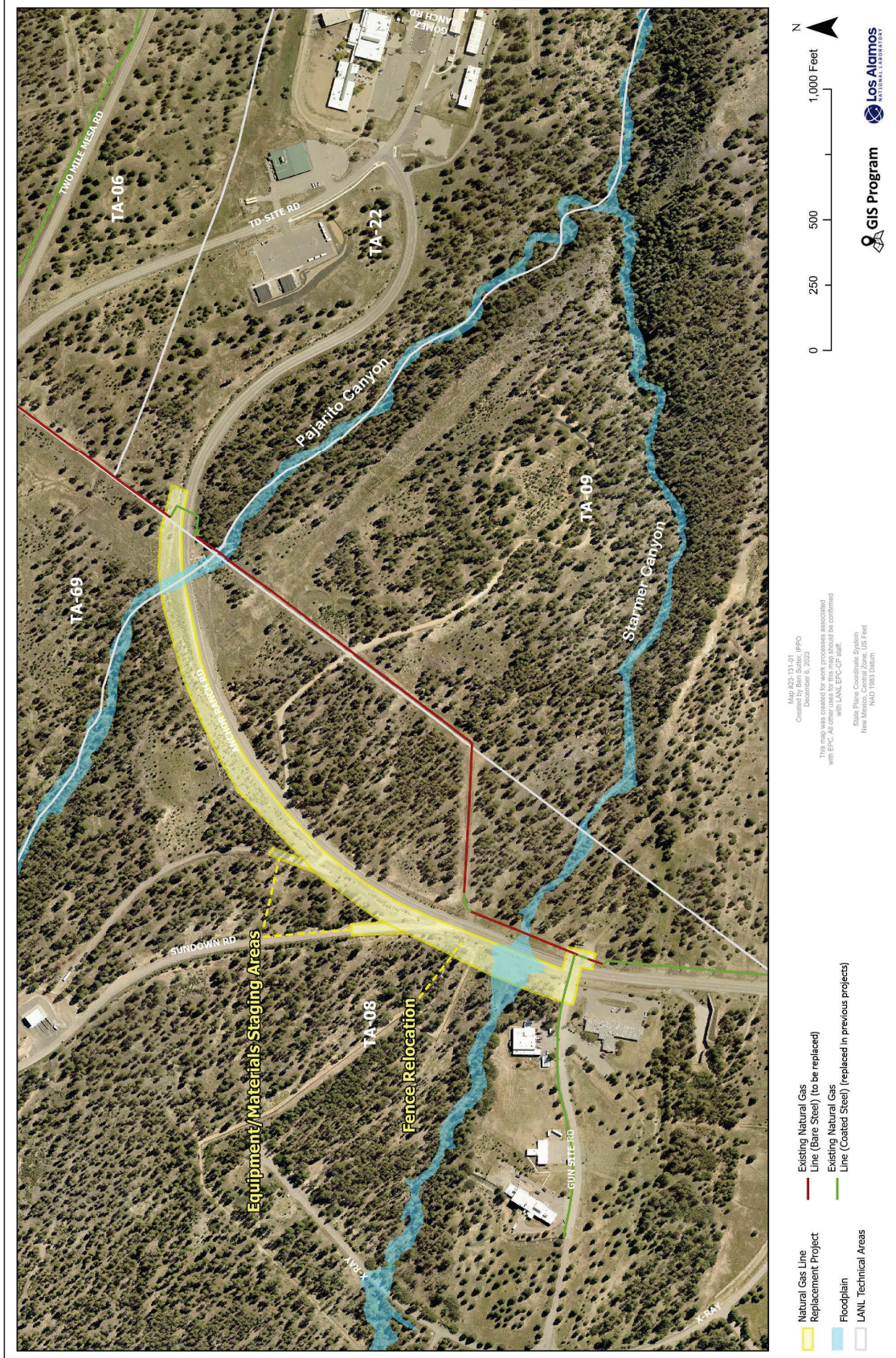


Figure 1. Proposed Natural Gas Line Replacement Project and Pajarito Canyon and Starmar Canyon 100-year Floodplains.

STEPS TO BE TAKEN TO MINIMIZE POTENTIAL HARM TO OR WITHIN THE FLOODPLAIN:

Potential short-term direct and indirect floodplain impacts from this project could occur in Pajarito and Starmer Canyons. There are no impacts anticipated in Sandia Canyon.

Other short-term direct and indirect impacts from the project will be avoided or minimized through implementation of the following best management practices:

- The project will require National Pollution Discharge Elimination System Construction General Permit coverage. This permit requires controls to limit soil erosion, sediment loss, and spills and leaks during and after construction. Controls would include temporary perimeter controls to reduce sediment transport during construction, final stabilization to control erosion after construction activities are completed, and pollution prevention measures such as housekeeping and spill prevention. Any required vegetation stabilization will be completed in accordance with the LANL Seeding Specification (LANL 2021).
- The project will not have any additional requirements for the Energy Independence and Security Act, Section 438. Proposed activities will not result in an increase in impervious surfaces and include stabilization of disturbed areas including restoring vegetation.
- The US Army Corps of Engineers will not require Clean Water Act Section 404 permit coverage or 401 certification requirements for this project.
- No historical or archeological sites are located in the areas of proposed disturbance based on LANL surveys and procedures. Provided project activities remains within the proposed project area, impacts to surrounding cultural sites are not anticipated. The project must follow the proper procedure for inadvertent discoveries.
- The proposed project is not located in threatened or endangered species habitat based on LANL surveys and procedures; therefore, no impacts are anticipated to occur to current listed species in the Los Alamos County area. If Jemez Mountain Salamanders are discovered during excavation work, the project must pause work and immediately notify LANL biologists.
- All waste will be handled and/or disposed of in accordance with the LANL Waste Management Procedure P409.

The proposed project will involve minimal disturbance of the Pajarito Canyon Area of Concern (AOC) C-00-011. Any disturbed soil from the AOC would be stabilized and managed on site. The project is required to take precautions to avoid inadvertently transporting potentially contaminated soil from the sites. If any soil is removed from the AOC, it must be disposed of in accordance with the LANL Waste Management Procedure P409 (LANL 2022). This project is to address the immediate need to replace an aging utility. Remediation work is conducted by DOE-Environmental Management. This project is being performed under DOE NNSA.

No long-term impacts to the floodplain are anticipated as a result of this project. Flow paths within the floodplain would not be significantly modified from pre-project conditions to post project conditions. The part of the natural gas line within the floodplains will be monitored after high flow events for erosion around or under the concrete slab. In the event this occurs, maintenance activities will be scheduled in addition to culvert inspection and maintenance.

SUPPLEMENTARY INFORMATION: A Floodplain Statement of Findings was prepared in accordance with Executive Order 11988, *Floodplain Management* and DOE implementing current regulations 10 Code of Federal Regulations 1022 *Compliance with Floodplain and Wetland Environmental Review Requirements* and provided a summary of the *Los Alamos National Laboratory Floodplain Assessment for the Technical Area 8 to Technical Area 22 Natural Gas Line Replacement Project* (Floodplain Assessment) analysis and determination.

The notification for the availability of the Floodplain Assessment and request for comments was sent to appropriate government agencies, tribes, organizations, and persons known to be interested in or potentially affected by the proposed floodplain action via the GovDelivery system and published online on December 21, 2023, for a 15-day public review and comment period on the DOE National Environmental Policy Act (NEPA) website at <https://energy.gov/nepa/articles/technical-area-8-technical-area-22-natural-gas-line-replacement-project-floodplain>. Three people's comments were received and addressed in this statement of findings as required and appropriate. These comments were sent to the project team for consideration in project planning and implementation.

FOR FURTHER INFORMATION ON THIS STATEMENT OF FINDINGS CONTACT: For further information or questions regarding this Floodplain Statement of Findings contact Ms. Kristen Dors via email at Kristen.Dors@nnsa.doe.gov; fax (505) 667-5948 or mail to:

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