Floodplain Statement of Findings for the

Technical Area 72 Outdoor Live Fire Range Fire Fuels Mitigation 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

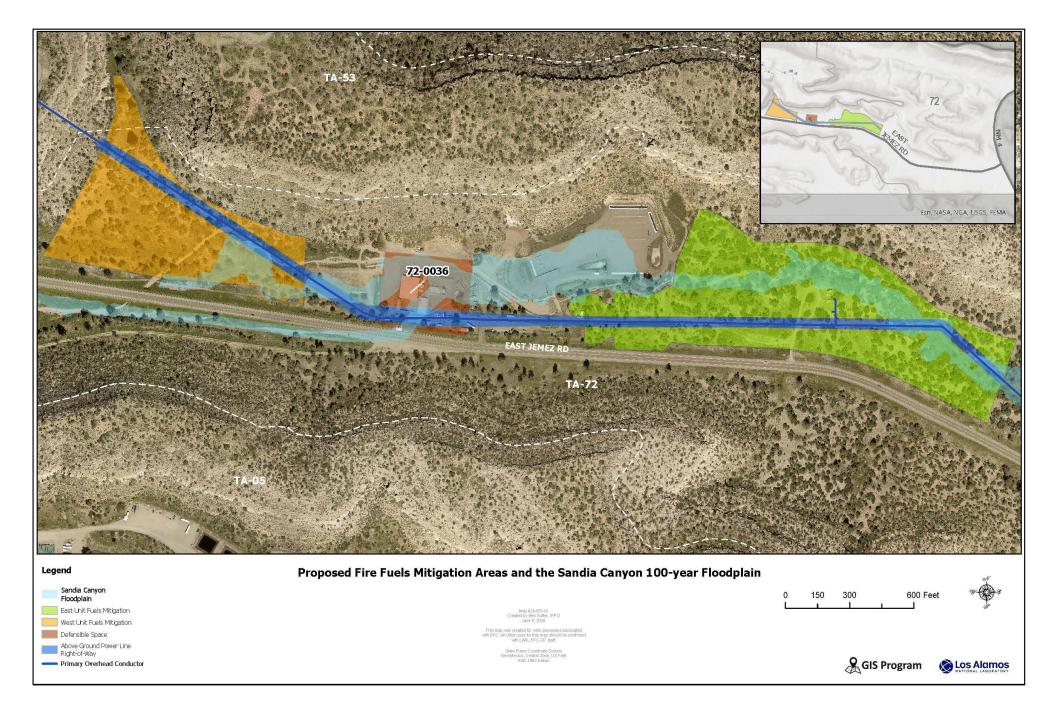
ACTION: Floodplain Statement of Findings

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 a fire fuels mitigation project in lower Sandia Canyon at the Technical Area (TA) 72 Outdoor Live Fire Range and surrounding areas at Los Alamos National Laboratory (LANL). The proposed project is intended to provide wildfire defensible space around existing structures, mitigate wildfire risk in the surrounding area, and improve range safety. The project activities within the Sandia Canyon 100-year floodplain include (1) vegetation maintenance mowing and thinning of the defensible space around the existing building, (2) vegetation maintenance under the existing above ground power line right-of-way, (3) vegetation maintenance along the existing East Jemez Road shoulder firebreak, and (4) vegetation thinning to the west and east of the TA-72 Outdoor Live Fire Range.

LOCATION WITHIN A FLOODPLAIN EXPLANATION: Through a wildland fire hazard risk assessments, LANL's Emergency Management Division Wildland Fire Program identified the TA-72 Outdoor Live Fire Range and the canyon bottom west and east of the Range, including the floodplain, as areas with an increased risk for high-intensity wildfires. Given the potential wildfire risk to in this area, 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/NNSA because fire fuels would continue to increase under the current conditions increasing the risk for wildfires, which may endanger LANL personnel and mission-related facilities in addition to surrounding communities and areas under other agency control. Other alternatives considered but not selected are (1) clear cutting, (2) large-scale application of herbicides, and (3) thinning all areas in the canyon bottom, excluding the floodplain. Clear cutting would reduce the fuel load but increase soil erosion, the potential for historical soil contaminates to migrate off site, and remove wildlife habitat. Large-scale application of herbicides would carry a high risk of exposing workers and local residents to the herbicides and increase the fuel load by not removing dead vegetation. Vegetation thinning in the project area, excluding the floodplain, was not selected because it does not meet wildland fire hazard analysis minimum-reduction-of-fire-fuels requirements to effectively reduce potential wildfire and fire fuel would continue to increase in the floodplain.

FLOODPLAIN PROTECTION STANDARDS: The proposed project would result in limited and minor direct and indirect short-term impacts to the Sandia Canyon 100-year floodplain and would not result in adverse impacts to the floodplain values or functions. The proposed project would also not change the flood hazard. Temporary disturbance within the floodplain would cease



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following completion of construction 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.

STEPS TO BE TAKEN TO MINIMIZE POTENTIAL HARM TO OR WITHIN THE FLOODPLAIN: Potential short-term direct and indirect floodplain impacts from release of pollutants to the floodplain and exposure to stormwater would be avoided or minimized through implementation of the following best management practices:

- Coverage under the 2022 Construction General Permit. The project is required to utilize
 appropriate best management practices to contain excavated materials and all other
 potential pollutants within the work site limits and away from potential stormwater flow.
 Controls may include temporary 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 LANL Seeding
 Specifications.
- Proposed project activities will not temporarily stage vegetation, soils, or equipment within
 the watercourse; activities must not push soils into the watercourse; and vegetation that
 has been removed or masticated must not be left in the watercourse. Heavy equipment
 must not be used within the stream channel, especially if conditions are too wet to prevent
 damage to the soil structure. Hazardous materials, chemicals, fuels, and oils would not be
 stored within the floodplain and equipment would be refueled at least 100 ft. from the
 Sandia Canyon floodplain.
- Any herbicides that might be applied to invasive tree species within the project area must be registered with the Environmental Protection Agency and New Mexico Department of Agriculture and be applied in accordance with manufacturers' recommendations (LANL 2016). Herbicides may not be applied to vegetation in a water course. The project must coordinate with LANL Water Quality staff to ensure compliance with the 2021 NPDES Pesticide General Permit (EPA 2021). The project must also coordinate with LANL Environmental Stewardship staff to ensure compliance with biological resource regulations and the National Environmental Policy Act (NEPA 1970).
- Archeological resources are located within or within 100 ft of the proposed thinning areas.
 To ensure compliance with the National Historic Preservation Act and LANL's cultural
 heritage management plan, prior to the start of any activities, a completed survey, site
 updates, site flagging for visibility and avoidance, and a walk down with project personnel
 must be performed by the Cultural Resources Program. The project must follow the
 proper procedure for inadvertent discoveries.
- The project will involve minimal disturbance of the Sandia Canyon Area of Concern (AOC) C-00-007. Any disturbed soil from the AOC would be stabilized using LANL approved best management practices and managed on site. The project is required to take precautions to avoid inadvertently transporting potentially contaminated soil from the site. If any soil is removed from the AOC, it must be managed, characterized and disposed of in accordance with the LANL Waste Management Procedures.

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 72 Outdoor Live Fire Range Fire Fuels Mitigation Project 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 August 27, 2024, for a 15-day public review and comment period on the DOE National Environmental Policy Act (NEPA) website at:

https://www.energy.gov/nepa/articles/los-alamos-national-laboratory-floodplain-assessment-ta-72-outdoor-live-fire-range. No comments were received.

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

Ms. Karen Armijo NNSA Los Alamos Field Office 3747 West Jemez Road Los Alamos, NM 87544