

Alaska District
U.S. Army Corps of Engineers

Date: 8 May 2015 Identification No. ER-15-08
Please refer to the identification number when replying.

Environmental Resources Section **Public Notice**

The U.S. Army Corps of Engineers (Corps) has prepared an environmental assessment (EA) and draft Finding of No Significant Impact (FONSI) for the following project:

Removal Action
Contaminated Soil
Former Mile 14 Naval Radio Station
Cordova, Alaska

The Corps proposes to remove contaminated soil from the former Mile 14 Naval Radio Station at Cordova, Alaska. This action will be performed by the Native Village of Eyak in partnership with the Corps under the Native American Lands Environmental Mitigation Program.

The proposed project and potential environmental impacts are described in the enclosed EA and draft FONSI, which is available for public review and comment for 30 days from the date of this notice. It may also be viewed on the Alaska District's website at: www.poa.usace.army.mil. Click on the Reports and Studies button, look under Documents Available for Public Review, and then click on the Environmental Cleanup link.

To obtain a printed copy, please send a request via email to: Christopher.B.Floyd@usace.army.mil or send a request to the address below. The FONSI will be signed upon review of comments received and resolution of significant concerns. Please submit comments regarding the proposed action to the above email or to the following address:

U.S. Army Corps of Engineers, Alaska District
ATTN: CEPOA-PM-C-ER
P.O. Box 6898
Joint Base Elmendorf-Richardson, Alaska 99506-0898

For information on the proposed project, please contact Chris Floyd of the Environmental Resources Section at the above email or Corps postal address.

Michael D. Noah
Chief, Environmental Resources Section



**US Army Corps
of Engineers**

Alaska District

Environmental Assessment and Finding of No Significant Impact

**Removal Action
Contaminated Soil**

**Former Mile 14 Naval Radio Station
Cordova, Alaska**

Native American Lands Environmental Mitigation Program



May 2015

DRAFT FINDING OF NO SIGNIFICANT IMPACT

In accordance with the National Environmental Policy Act of 1969, as amended, the U.S. Army Corps of Engineers, Alaska District (Corps) has assessed the environmental effects of the following action:

Removal Action Contaminated Soil

Former Mile 14 Naval Radio Station Cordova, Alaska

This action, to be performed by the Native Village of Eyak in partnership with the Corps under the Native American Lands Environmental Mitigation Program, has been evaluated for its effects on several significant resources, including fish and wildlife, wetlands, threatened or endangered species, marine resources, and cultural resources. No significant short-term or long-term adverse effects were identified.

This Corps action complies with the National Historic Preservation Act, the Endangered Species Act, the Clean Water Act, the Magnuson-Stevens Fishery Conservation and Management Act, and the National Environmental Policy Act. The completed environmental assessment supports the conclusion that the action does not constitute a major Federal action significantly affecting the quality of the human and natural environment. An environmental impact statement is therefore not necessary for the removal action at the former Mile 14 Naval radio station site.

Christopher D. Lestochi
Colonel, U.S. Army Corps of Engineers
District Commander

Date

Environmental Assessment

1.0 PURPOSE AND NEED OF REMEDIAL ACTION

1.1 Introduction

The U.S. Army Corps of Engineers (Corps) prepared this environmental assessment (EA) to address, under the National Environmental Policy Act (NEPA), the excavation of lead-contaminated soils and other ground-disturbing activities at the former military facilities near Cordova, Alaska. The Native Village of Eyak (NVE) is performing the work in partnership with the Corps under the Native American Lands Environmental Mitigation Program (NALEMP).

1.2 Site Description and History

The Mile 14 Naval Radio Station project site (Mile 14 site) is located along the Copper River Highway approximately 14 miles southeast of Cordova and approximately 155 air miles southeast of Anchorage, at roughly 60.40°N, 145.42°W (figure 1).

The Mile 14 site was built 14 miles from Cordova along the former Northwestern Railway in 1917, and was active until 1930 when most of the equipment was moved to another location. The site occupies about 40 acres south of what is now the Copper River Highway. The facilities at the site once included numerous structures, including a power house and fuel storage tanks, a machine shop, a barracks building and three cottages, a railroad depot building, and two 300-foot-tall self-supported steel towers (figure 2). After deterioration of the site and multiple removal actions, the structural features currently remaining at the site include the power house (cover photograph of this document), concrete foundations, and sections of steel tower.

The NVE has conducted five soil investigations at the Mile 14 site since 2008 to characterize the extent and nature of the contamination. In general, diesel concentrations in soils meet cleanup standards for ingestion and inhalation, as well as an alternative cleanup level for the migration to groundwater pathway. However, a portion of the Mile 14 site has concentrations of lead that exceed the State of Alaska cleanup level (400 mg/kg), and which may pose an ingestion risk to human receptors that visit the site. The NVE estimates that approximately 90 cubic yards of soil with lead concentrations exceeding the soil cleanup level are present around the power house building, and believes a smaller hot-spot of lead contaminated soil may be present about 60 feet east of the power house (BES 2014).

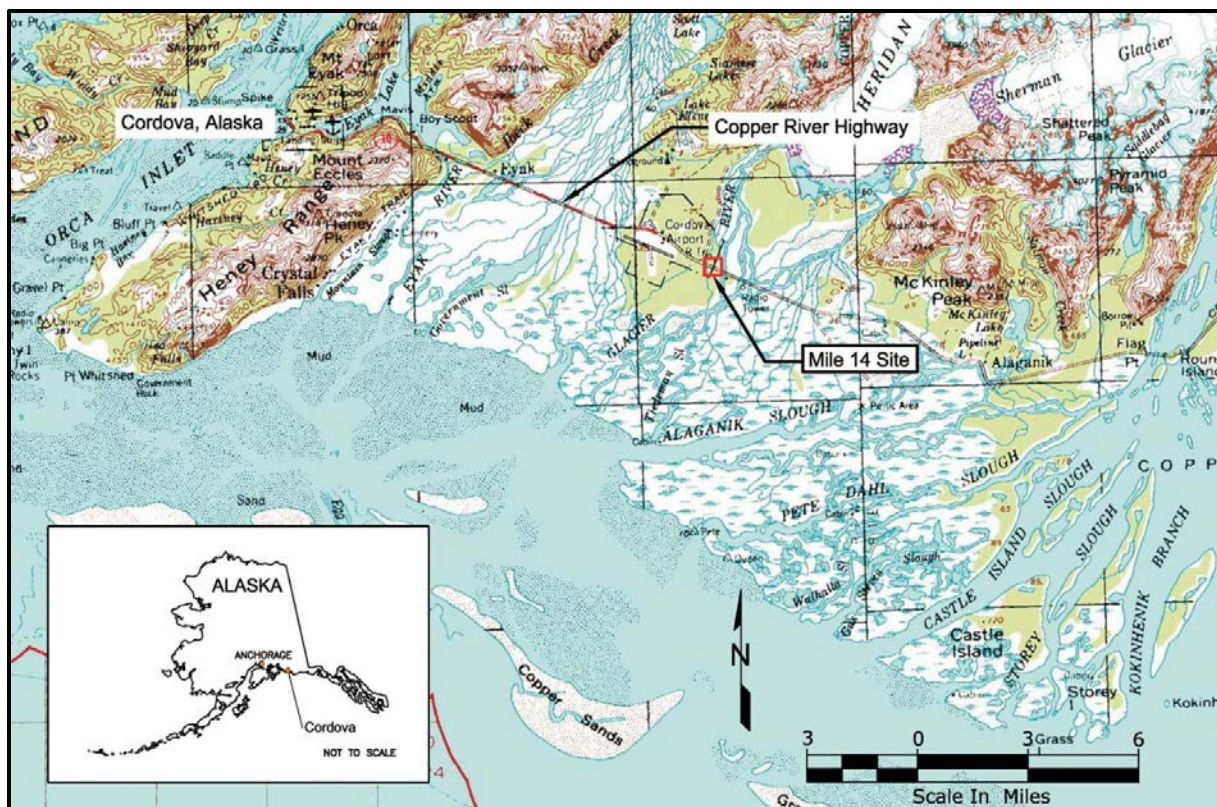


Figure 1. Location and vicinity of the Mile 14 site (adapted from BES 2014).



Figure 2. Layout of Mile 14 site (adapted from BES 2014).

1.3 Need for Action

The NVE is concerned about the presence of chemical contamination on their land and potential impacts on persons using that land. They wish to expedite the removal of that contamination.

2.0 ALTERNATIVES

2.1 No-Action Alternative

Under the no-action alternative, the contaminated soil would remain in place. This would limit use of the area by the community and potentially allow the migration of chemical contaminants to nearby streams and wetlands, and may leave the NVE open to regulatory action on the part of the State of Alaska. The no-action alternative would avoid the short-term disruptions to the local environment that would be caused by the operation of heavy equipment and excavation of soil.

2.2 Remedial Alternatives

Alternatives for the remediation of contaminated soil at the Mile 14 were explored in a 2012 feasibility study (Ridolfi 2012). The remediation alternatives examined included:

- No action and/or institutional controls
- Removal of lead-contaminated soils and *in situ* treatment of fuel-contaminated soils
- Removal of both lead-contaminated and fuel-contaminated soils

The feasibility study primarily looked at cost and practicability issues, and stated simply that the differences in environmental impacts between the two alternatives would be negligible. The 2012 feasibility study did not specifically address removal of lead-contaminated soil combined with “no action” for the fuel-contaminated soil. A 2013 site characterization study concluded that the concentrations of fuel at the site are below cleanup standards for viable exposure pathways.

Alternatives available for the remediation of contaminated soil generally include the following: excavation and treatment or disposal off site, excavation and confined disposal on or near site (e.g., a monocell), excavation and on or near-site remediation (e.g., landfarming), or *in situ* remediation. The primary contaminant of concern at the Mile 14 site is lead, which as a heavy metal is not amenable to most forms of on-site remediation. Neither the landowner nor the regulator favor on-site disposal. The estimated quantity of lead-contaminated soil needing removal (about 100 cubic yards) is relatively modest and can be handled, containerized, and shipped using equipment that the NVE mostly has on hand in Cordova. For these reasons, the NVE and the Corps selected excavation and off-site disposal as the preferred alternative for this removal action. Given that *in situ* remediation is not an option for the contamination at this site, and that all other remedial alternatives require soil excavation as well as additional management

of the soil in the local environment, the preferred alternative of excavation and off-site disposal at an appropriate facility is the least environmentally damaging alternative available for the project.

2.3 Description of the Preferred Alternative

The proposed removal action is described in detail in the project remediation work plan (BES 2014). The primary objective of the project is to excavate and dispose of soil at the site that exceeds the 400 mg/kg State of Alaska cleanup level for lead in soil; a secondary objective is to investigate whether soil beneath the former power house exceeds the lead cleanup level.

Prior to excavation, the NVE will delineate known lead-contaminated areas with pin flags or other appropriate means. Field screening with X-ray fluorescence (XRF) instrumentation may be used to identify other hotspots. A front-end loader or excavator will be used to remove lead-contaminated soil; smaller hotspots may be excavated with hand tools. Initial excavations will extend to the shallower of 2 feet below ground surface (bgs) or the depth of groundwater. The excavated soil will be placed directly into U.S. Department of Transportation (DOT)-compliant open-top containers or double-walled fabric bulk containers. If stockpiling is necessary, the stockpiles will be lined, covered, and managed in compliance with State of Alaska regulations. Stockpiles will be located at least 100 feet from any water body. When confirmation sampling indicates that the limits of contamination have been reached, the excavation will be backfilled, compacted, and contoured to grade using clean fill material from a local, established borrow source. The area to be excavated is largely unvegetated now and may be the source of additional activities in the future, so the backfilled areas may not be re-vegetated at this time. If re-vegetation is desired or required, a seed mix compatible with local flora and growing conditions will be used. Fertilizer may be used if appropriate. Backfill stockpiles will not be left on site (BES 2014).

Environmental protection steps will primarily consist of standard construction best management practices (BMPs) to avoid unnecessary disturbance or damage to the local environment. Erosion control BMPs may include covering exposed soil, limiting off-road travel, and placing silt fences where applicable to control sediment runoff from the project site perimeter and to protect any nearby creeks or drainage channels. Road surfaces will be wetting if airborne dust becomes apparent. All fuels and fluids used in machinery and excavation equipment will be stored at least 50 feet from creeks and beaches. Equipment and trucks containing fuel will park at least 50 feet from creeks and beaches when not in use. Emergency spill response procedures and materials will be provided on all equipment. Materials will include sorbent mats, socks, and pads for absorbing fuels and fluids used on site.

Because of the presence of lead, the contaminated soil has the potential to be a hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). The soil will be tested to determine whether it is a hazardous waste and, where necessary, managed, documented, and

shipped in accordance with hazardous waste regulations. The NVE anticipates that the containerized, contaminated soil will be received by Waste Management, Inc., at their treatment, storage, and disposal (TSDF) facility at Portland, Oregon (BES 2014).

3.0 AFFECTED ENVIRONMENT

3.1 Community

The Mile 14 site is in a largely uninhabited area about 14 miles from the Cordova town center and 1.6 miles southeast of the Cordova airport. Cordova is a community of about 2,200 people, located off the road system on the southeastern shore of Prince William Sound (ADCRA 2015).

3.2 Current Land Use

The Mile 14 site is on lands administered by the Eyak Native Corporation. The site is largely vacant except for the remains of the radio station itself and is immediately adjacent to the 49-mile-long Copper River Highway (figure 2). The highway sees moderate traffic by tourists and local residents traveling to such points-of-interest as Alaganic Slough, Childs Glacier, and the “Million Dollar Bridge” at its terminus.

3.3 Climate

Due to its proximity to the Gulf of Alaska, Cordova receives abundant rain and fog, with cool summers and winters that lack long periods of freezing temperatures at lower elevations. Average annual precipitation is 148.37 inches with 100 annual inches of snowfall (ADCRA 2015).

3.4 Topography, Soils, and Hydrology

The Mile 14 site is in an area of flat, relatively elevated glacial deposits in between the outwash plains of the Eyak and Copper Rivers (figure 1). Soils are well-sorted, stratified glacial and riverine gravel, and sands up to 180 meters thick. Numerous small stream channels and sloughs of standing water cut through the area, and groundwater is expected to be very shallow.

3.5 Biological Resources

The project site is just outside the boundary of the Copper River Delta Critical Habitat Area managed by the Alaska Department of Fish and Game (ADFG). This 35-mile-wide complex of wetlands, streams, and tide flats is a vital migratory stop-over and nesting area for millions of shorebirds, ducks, geese, cranes, and swans. Arctic terns, mew gulls, dowitchers, and phalaropes

are also common nesters. The Copper River Delta supports large runs of all five species of Pacific salmon, as well as steelhead and cutthroat trout, Dolly Varden, whitefish, and eulachon. Common mammals in the delta include beaver, mink, river otter, and moose, which were introduced to the area in 1949 (ADFG 2015a).

Vegetation consists of grasses, sedges, and horsetails, with forbs and woody plants such as willows and alder colonizing dryer areas. Few large trees exist in the area, except where fill or uplift has created zones of well-drained soils. At the Mile 14 site, gravel pads and areas of bare ground (figure 2) are surrounded by zones of recovering vegetation dominated by grasses, forbs, and horsetails, and broad swaths of alder and willow scrub. A belt of dispersed taller trees, mostly western hemlock and cottonwood, extends from the southeast corner of the site (figures 2 and 3).



Figure 3. A 2010 view of the southeast corner of the Mile 14 site, showing the remains of the barracks foundation surrounded by low forbs and horsetails, with alder scrub and widely spaced western hemlock trees in the background.

3.6 Wetlands

The Mile 14 site is not known to have been delineated for wetlands. The U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory website (USFWS 2015a) shows a patchwork of emergent and forested wetlands in the general area, but also areas of uplands along the Copper River Highway and farther north. Fill was placed the Mile 14 site as part of its original construction and also as authorized discharges during the course of remedial activities. The aerial

photograph in figure 2 shows obvious areas of fill, surrounded by areas of surface water and vegetation that are most probably jurisdictional wetlands.

3.7 Protected Species

Endangered Species Act. There are no species in or near the project area listed under the Endangered Species Act (ESA) according to information made available online by the USFWS (USFWS 2015b).

Bald and Golden Eagle Protection Act. The general project area is within the range of both bald and golden eagles, although the abundance of streams and ponds in the area and its proximity to the coast would be more attractive habitat to bald eagles. Both species are protected under the Bald and Golden Eagle Protection Act, as well as the Migratory Bird Treaty Act (see below). In addition to prohibiting direct takes such as killing eagles or destroying nests, this act also regulates human activity or construction that may interfere with eagles' normal breeding, feeding, or sheltering habits (USFWS 2011).

Migratory Bird Treaty Act. With the exception of State-managed ptarmigan and grouse species, all native birds in Alaska (including active nests, eggs, and nestlings) are protected under the federal Migratory Bird Treaty Act (MBTA; USFWS 2009).

3.8 Essential Fish Habitat and Anadromous Streams

The Anadromous Waters Catalog maintained by the ADFG notes several anadromous streams crossing the Copper River Highway between the airport and the Sheridan River Bridge, but none of these are particularly close to the project site (ADFG 2015b). No marine essential fish habitat exists near the project site.

3.9 Cultural and Historic Resources

A review of the Alaska Historic Resources Survey (AHRS) database indicates one historic property within the project area of potential effect (APE): the Mile 14 former Naval radio station itself, designated COR-445 in the AHRS. Two additional historic properties are immediately adjacent to the APE: the rail bed of the Copper River & Northwestern Railway (COR-398) and the Copper River Highway (COR-576). No known prehistoric sites are within or adjacent to the APE (Pierce 2015).

Both the former radio station and the rail bed have been previously determined not to be eligible for the National Registry of Historic Places (NRHP) due to lack of integrity; no determination of eligibility has been made for the Copper River Highway.

3.10 Air Quality and Noise

The project area presumably enjoys excellent air quality due to a general lack of pollutant emission sources. There is no air monitoring station near the project site and no existing data to compare with other National Ambient Air Quality Standards (NAAQS) established under the Clean Air Act (CAA). These air quality standards include concentration limits on the “criteria pollutants” of carbon monoxide, ozone, sulfur dioxide, nitrogen oxides, and lead. The area is not in a CAA “non-attainment” area, and the “conformity determination” requirements of the CAA would not apply to the proposed project at this time.

Potential sources of air pollution would be limited to emissions from planes using the nearby airport and vehicles on the Copper River Highway that include both non-point/mobile sources and fixed point sources. Dust lofted from the gravel highway would be a source of particulate pollution.

The major sources of noise would presumably be from aircraft (to include passenger jets) using the nearby airport and vehicles on the adjacent highway.

4.0 ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVES

4.1 No-Action Alternative

The no-action alternative will avoid the short-term disruptions to the local environment caused by the operation of construction equipment and excavation of soil. However, the contaminated soil will remain in place and limit the use of the area by the community, and potentially allow the migration of chemical contaminants to nearby wetlands and subsistence areas.

4.2 Remediation Alternatives

Under the preferred alternative, lead-contaminated soils will be removed from the site to the extent practical and backfilled with clean soil. The potential environmental consequences are described below.

4.2.1 Effects on Current Land Use

The Mile 14 site is on privately-managed land with no access to public use areas. The proposed cleanup actions will be well off of the Copper River Highway and have minimal impact on public use of the highway beyond a marginal increase in traffic by trucks and heavy equipment.

4.2.2 Effects on Topography, Soils, and Hydrology

The excavations will be backfilled and graded to conform to existing ground contours and will

not significantly alter the topography or patterns of overland water flow in the area.

4.2.3 Effects on Biological Resources

The planned activities will be highly localized in their impacts and affect areas already heavily altered by the former military facilities and past cleanup efforts. Most excavation work will occur in areas bare of vegetation, but a small amount of brush may need to be cleared to access specific features. The activities will have little effect on local wildlife and no long-term negative impact on their habitat. The project site is surrounded by large areas of similar, higher-quality habitat, and any wildlife displaced from the project area by noise and activity should be able to quickly resume their natural behavior.

4.2.4 Effects on Wetlands

The proposed excavations will occur primarily in previously-filled areas; backfilling of these excavations will not constitute a discharge under Section 404 of the Clean Water Act. Any incidental discharge into wetlands in the course of the project is authorized under Nationwide Permit No. 38, "Cleanup of Hazardous and Toxic Waste". This EA serves as notice of the invocation of this Nationwide Permit.

4.2.5 Effects on Protected Species

The Corps determines that the planned activities will have no adverse effect on any species listed under the Endangered Species Act or their critical habitat, as none exists in the project area. Nesting birds are likely to be the most vulnerable animal species at the site. The destruction of active nests, eggs, or nestlings is a violation of the Migratory Bird Treaty Act (MBTA). The U.S. Fish and Wildlife Service advises that the period 1 May through 15 July should be considered the nesting window for forest- or shrub-nesting birds in the Copper River Delta (USFWS 2009). The project activities may overlap this nesting window. One means of avoiding a "taking" of nesting birds under the MBTA would be to perform necessary brush and tree removal before the start of the nesting window. Noise and activity from site operations has the potential to disturb birds attempting to nest near the project site; however, similar work has been performed at the project site frequently over the years, and the noise of regular traffic along the adjacent highway probably induces more sensitive species to nest further away from the highway.

No eagle nesting sites are known to exist near the Mile 14 site. The trees near the project site appear to be fairly narrow-crowned hemlock and cottonwood that would provide marginal nest support and do not border significant fish-bearing streams. More attractive nesting habitat is available along higher ground to the west and north of the project area.

The project will not require crossing or altering any anadromous streams, and will have no effect on essential fish habitat. Nearby water-courses will be protected from sediment run-off or the release of petroleum products at the work site.

4.2.6 Effects on Cultural Resources

The Corps has determined that the proposed activities will not affect historic properties and has sought concurrence with that determination from the State Historic Preservation Officer (Pierce 2015). Only the COR-445 radio station site will be directly impacted by the excavation work, and that site has been determined not to be eligible for the NRHP.

4.2.7 Effects on Air Quality and Noise

Air quality may be affected, primarily through an increase in particulates, in the project area due to the use of heavy equipment, vehicles, and generators. The Corps determines that any poor air quality conditions caused by the project will be highly localized and transient and will dissipate entirely at the end of the project. Dust control (i.e. watering) as a Best Management Practice (BMP) may also be utilized during hauling operations to control dust if needed.

The planned activities at the site and the movement of trucks and equipment into and out of the project along local roads will increase the levels of noise in the local area during several weeks of the working season.

4.2.8 Effects on Coastal Zone Management

Alaska withdrew from the voluntary National Coastal Zone Management Program (<http://coastalmanagement.noaa.gov/programs/czm.html>) on July 1, 2011. Within the State of Alaska, the federal consistency requirements under the Coastal Zone Management Act do not apply to federal agencies, those seeking forms of federal authorization, and state and local government entities applying for federal assistance.

4.2.9 Effects on Environmental Justice

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires Federal agencies to identify and address any disproportionately high and adverse human health effects of its programs and activities on minority and low-income populations.

The express purpose of the proposed project is to reduce risks to human health and welfare in the region by removing contaminants from the environment. The Corps does not anticipate adverse impacts from this project on the local human population.

4.2.10 Cumulative Effects

Federal law (40 CFR 651.16) requires that NEPA documents assess cumulative effects, which are the impact on the environment resulting from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions.

The proposed project will have the ultimate net effect of removing a large mass of chemical contamination from the environment. The immediate incremental impacts of air pollutants and noise from construction machinery will be of short duration and will not contribute to long-term cumulative effects. The project may indirectly contribute to long-term changes in land use and environmental quality by encouraging use of the restored land.

4.2.11 Avoidance and Minimization of Environmental Impacts

Steps to avoid and minimize environmental impacts will primarily consist of standard construction best management practices (BMPs) to avoid unnecessary disturbance or damage to the local environment; these BMPs will be developed more fully in the contractor's work plan. Erosion control best management practices may include covering exposed soil with brush, netting, erosion blankets, or mulches (e.g., chipped brush); limiting off-road travel; and placing silt fences where applicable to control sediment runoff from the project site perimeter and to protect any nearby creeks or drainage channels.

All fuels and fluids used in machinery and excavation equipment will be stored at least 50 feet from creeks and beaches. Equipment and trucks containing fuel will park at least 50 feet from creeks and beaches when not in use. Emergency spill response procedures and materials will be provided on all equipment; materials will include sorbent mats, socks, and pads for absorbing fuels and fluids used on site.

Site workers will avoid destroying active bird nests as described in Section 4.2.3. No active eagle nests have been reported near the proposed work sites, but if new eagle nests are discovered, they should be reported immediately to the Corps.

5.0 Permits and Authorizations

This continuing project will require few resource permits or authorizations. The Corps has sought concurrence from the State Historic Preservation Officer that the proposed work will not cause adverse effects to cultural resources. The Corps does not expect the project to require discharge of materials into wetlands. If an excavation did extend into a wetland area, the backfilling of that excavation will be authorized by Nationwide Permit No. 38, "Cleanup of Hazardous and Toxic Waste."

Alaska withdrew from the voluntary National Coastal Zone Management Program (<http://coastalmanagement.noaa.gov/programs/czm.html>) on July 1, 2011. Within the State of Alaska, the federal consistency requirements under the Coastal Zone Management Act do not apply to federal agencies, those seeking forms of federal authorization, and state and local government entities applying for federal assistance.

6.0 CONCLUSION

The continued environmental cleanup efforts at the former Mile 14 Naval Radio Station site, as discussed in this document, will have some minor, largely controllable short-term impacts, but in the long term will help improve the overall quality of the human environment. This assessment supports the conclusion that the proposed project does not constitute a major Federal action significantly affecting the quality of the human environment; therefore, a finding of no significant impact will be prepared.

7.0 PREPARERS OF THIS DOCUMENT

This environmental assessment was prepared by Chris Floyd and Diane Walters of the Environmental Resources Section, Alaska District Corps of Engineers. The Corps of Engineers Project Manager is Andrea Elconin.

8.0 REFERENCES

Alaska Division of Community and Regional Affairs (ADCRA). 2015. Community Database Online: http://www.dced.state.ak.us/dca/commdb/CF_CIS.htm.

Alaska Department of Fish and Game (ADFG). 2015a. Copper River Delta Critical Habitat Area website: <http://www.adfg.alaska.gov/index.cfm?adfg=copperriverdelta.main>

ADFG. 2015b. Anadromous Fish Distribution Database: <http://www.sf.adfg.state.ak.us/SARR/AWC/index.cfm/FA/maps.interactive>.

Bethel Environmental Solutions (BES). 2014. Work Plan, Final, Soil Remediation at the Mile 14 Naval Radio Station Site, Cordova Vicinity, Alaska, prepared for Native Village of Eyak. November 2014.

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U.S. Fish and Wildlife Service (USFWS). 2009. ADVISORY: Recommended Time Periods for Avoiding Vegetation Clearing in Alaska in order to Protect Migratory Birds.

USFWS. 2015a. National Wetlands Inventory website:
<http://www.fws.gov/wetlands/Data/Mapper.html>

USFWS. 2015b. IPaC – Information, Planning, and Conservation System website:
<http://ecos.fws.gov/ipac/>