



Alaska District
U.S. Army Corps of Engineers

Environmental Resources Section

Public Notice

Date 17 May 2024 Identification No. ER-PN-24-04

Please refer to the identification number when replying.

The U.S. Army Corps of Engineers (USACE) Alaska District has prepared an Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) for the following project:

Remedial Action
Containerized/Hazardous, Toxic, & Radiological Waste (CON/HTRW)
Yakutat Air Base Formerly Used Defense Site, Concern M4 (F10AK0606-19)
Yakutat, Alaska

The USACE Alaska District proposed project is authorized under the Department of Defense (DoD) Environmental Restoration Program – Formerly Used Defense Sites (ERP-FUDS), which provides the means to clean up waste materials, contaminated soil, and unsafe structures and debris from areas formerly used by the DoD.

Information on the proposed project and anticipated environmental effects are discussed in the enclosed EA and draft FONSI. It may also be viewed on the USACE 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.

The EA and draft FONSI are available for public review and comment for 30 days from the date of this notice. All comments received on or before this date will become part of the official record. The FONSI will be signed upon review of comments received and resolution of significant concerns.

To obtain a printed copy of the EA and draft FONSI, please send a request via email to: Christopher.B.Floyd@usace.army.mil or send a request to the address below. Please submit comments regarding the proposed project to the above email or to the following address:

U.S. Army Corps of Engineers, Alaska District
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For information on the proposed project, please contact Chris Floyd of the Environmental Resources Section at the above email or Corps postal address.

for
Michael B. Rouse
Chief, Environmental Resources Section
USACE, Alaska District



US Army Corps
of Engineers®

Environmental Assessment and Finding of No Significant Impact

Containerized Hazardous, Toxic, or Radioactive Waste
(CON/HTRW) Remedial Action

Yakutat Air Base Formerly Used Defense Sites

F10AK0606-19 (Concern M4)

Yakutat, Alaska

Formerly Used Defense Sites Program



1943 aerial photograph of Yakutat Air Base

April 2024

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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:

**CON/HTRW Remedial Action
Yakutat Air Base Formerly Used Defense Sites
F10AK0606-19 (Concern M4)
Yakutat, Alaska**

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. In accordance with the President's Council on Environmental Quality (CEQ) Regulations (40 CFR 1501.12) the Corps incorporates by reference the analyses performed in the 2021 Decision Document supporting the reissuance of Nationwide Permit No. 38, "Cleanup of Hazardous and Toxic Waste." 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 remedial action at this former Yakutat Air Base site.

This action 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.

Jeffery S. Palazzini
Colonel, U.S. Army
Commanding

Date

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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) in accordance with the National Environmental Policy Act (NEPA) and Council of Environmental Quality regulations implementing NEPA (40 CFR 1500-1508) to address the removal of containerized waste, contaminated soil, and buried structures at the former Yakutat Air Base military facilities near Yakutat, Alaska. The Corps' proposed actions are authorized under the Department of Defense (DOD) Environmental Restoration Program – Formerly Used Defense Sites (DERP-FUDS), which provides the authority to clean up waste materials, contaminated soil, and unsafe structures and debris from sites that were owned by, leased to or otherwise possessed by the United States and under the jurisdiction of the Secretary of Defense, and transferred from DoD control prior to 17 October 1986 (DOD Instruction 4715.07). Most FUDS projects follow Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) processes, which would not include preparation of an EA under NEPA. However, the proposed project involves the excavation and disposal of petroleum, oil, and lubricant (POL) contaminated soil, which falls outside the purview of CERCLA.

1.2 Site Description and History

The former Yakutat Air Base is located within the boundaries of the City of Yakutat, Alaska, near the community's airport, approximately 225 miles northwest of Juneau and 220 miles southeast of Cordova at 59° 33' N Latitude, 139° 44' W Longitude (Section 30, Township 27 South, Range 34 East, Copper River Meridian; Figure 1).

Construction of the World War II-era Yakutat Air Base began in October 1940 and was completed in 1943. The U.S. Army declared the base surplus in 1945; it was transferred to the Civil Aeronautics Administration (CAA) in 1947 (USACE 2023b). A portion of the Air Base property, designated "Air Corps Increase Group No.1" in some documents, was located northwest of the intersection of 28th Engineer Road (Airport Road) and Air Corps Road (Cannon Beach Road). Historically the area was used for housing and administration to meet the needs of the increased size of Air Corps personnel stationed at Yakutat during World War II. Structures erected in this area included at least one warehouse, two mess halls, one latrine, and 37 Quonset huts, three powerhouses, and several Cowin huts. The area provided housing for approximately 30 officers and 700 enlisted soldiers. Today, much of the area is heavily forested and consists of a comparatively small number of collapsed buildings and concrete foundations. In 1984 most structures in the Air Corps Increase Group No. 1 area were knocked down and buried in holes dug adjacent to their footprint (USACE 2023b)

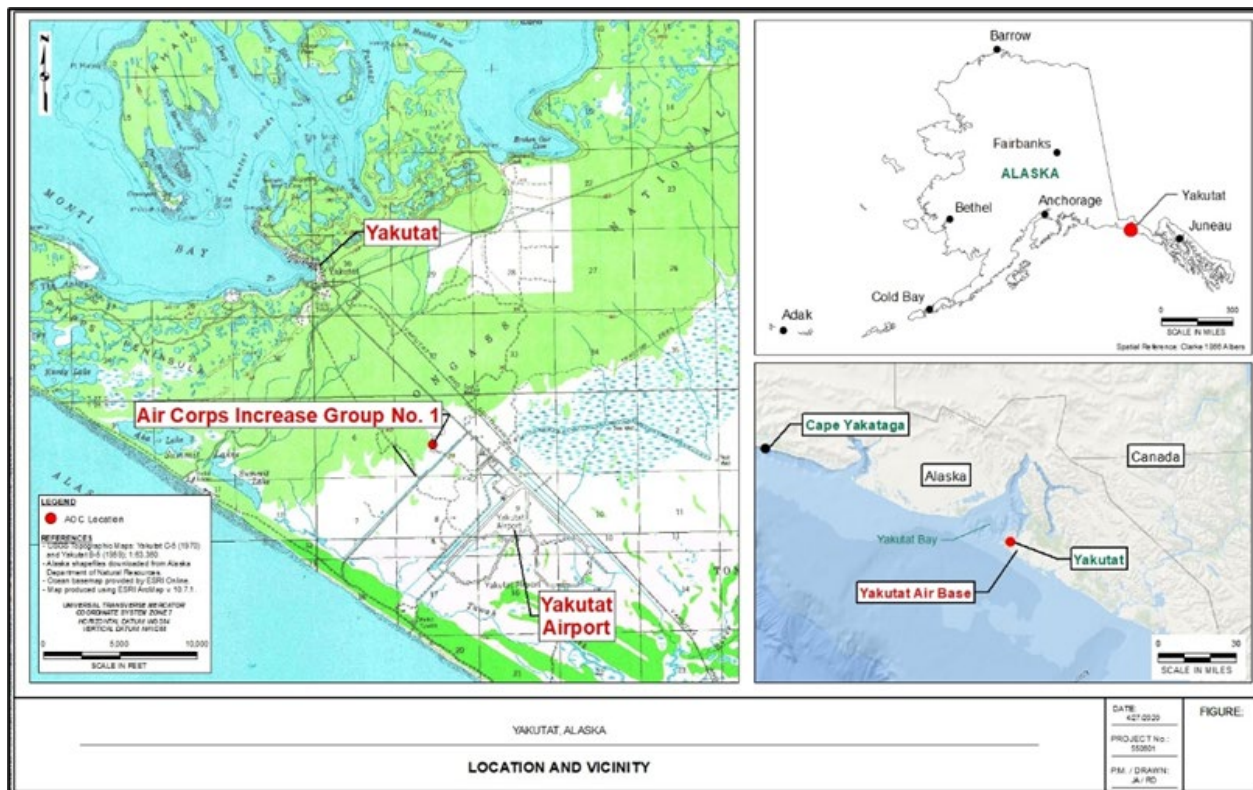


Figure 1. Location of the AC Increase Group No.1/Concern M4 area.

In 1995, hazardous, toxic, and radioactive waste (HTRW) and containerized HTRW (CON/HTRW) projects were approved for the Yakutat Air Base FUDS property in response to waste materials and environmental contamination remaining at the site. Remedial investigations (RIs) began in 2000 and continued intermittently until 2014. In 2015, for the purposes of the ongoing remedial activities, Project 02 of the former air base facilities at Yakutat was divided into several different “areas of concern” (AOC; a.k.a, “Concerns”), and identified with letters and numbers. The AOC M4 identifies the former Post Powerhouse No. 564 and the associated aboveground storage tanks (ASTs) that were identified on a Yakutat Air Base Alaska Utilities Layout Air Corps Expansion as-built drawing dated July 27, 1942. The M4 powerhouse remains were located approximately 900 feet north of the former 50-kilowatt powerhouse (M3); the two flat octagonal concrete AST pads are located south and southwest of the powerhouse. At the request of the U.S. Forest Service (USFS) the M4 powerhouse was not removed during 1984 USACE restoration activities. The Alaska Department of Environmental Conservation (ADEC) identifies the site as Yakutat AFB M4 - Post Powerhouse No. 564, Hazard ID 26912. The site is approximately located at 59.5160823 North Longitude and -139.6913015 West Latitude (USACE 2022).

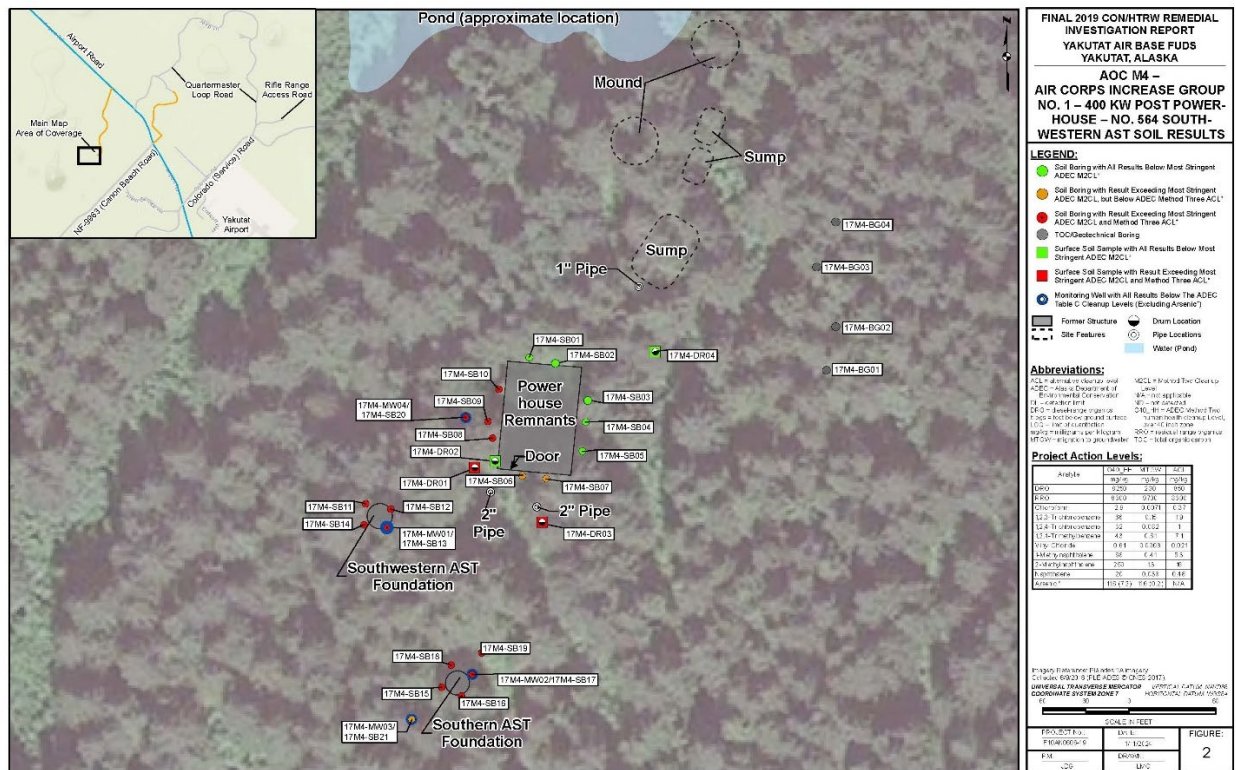


Figure 2. Observations of contamination encountered in 2017 remedial investigation (adapted from USACE 2019).

The M4 powerhouse remnants consist of a thick rectangular concrete pad, block foundation, collapsed brick chimney, boiler, water well, wood, and miscellaneous equipment, pipes, and wires. The area is surrounded by old growth spruce trees. Low-lying brush consists of berry bushes, devil's club, and moss. South of the powerhouse are two AST foundations that are approximately 7 - 10 feet in diameter each. The ASTs were originally constructed of wood staves above the foundations (USACE 2020).

In 2017, a remedial investigation (RI) was conducted to identify the nature of contamination associated with the former Powerhouse and two ASTs. Samples of surface and subsurface soil, as well as groundwater, were collected and analyzed. Fuel contamination in the form of diesel range organics (DRO), residual range organics (RRO) and polycyclic aromatic hydrocarbons (PAHs) were detected at concentrations exceeding the most conservative State of Alaska soil cleanup levels (USACE 2019; Figures 2 and 3). In 2019, another RI was conducted to delineate the extent of the POL-related contamination and evaluate associated human health and ecological risks. In one of four monitoring wells the DRO concentration was 1,700 ug/L, above the project screening level (PSL) of 1,500 ug/L. DRO was detected in five other monitoring wells although the concentrations were below the PSL.

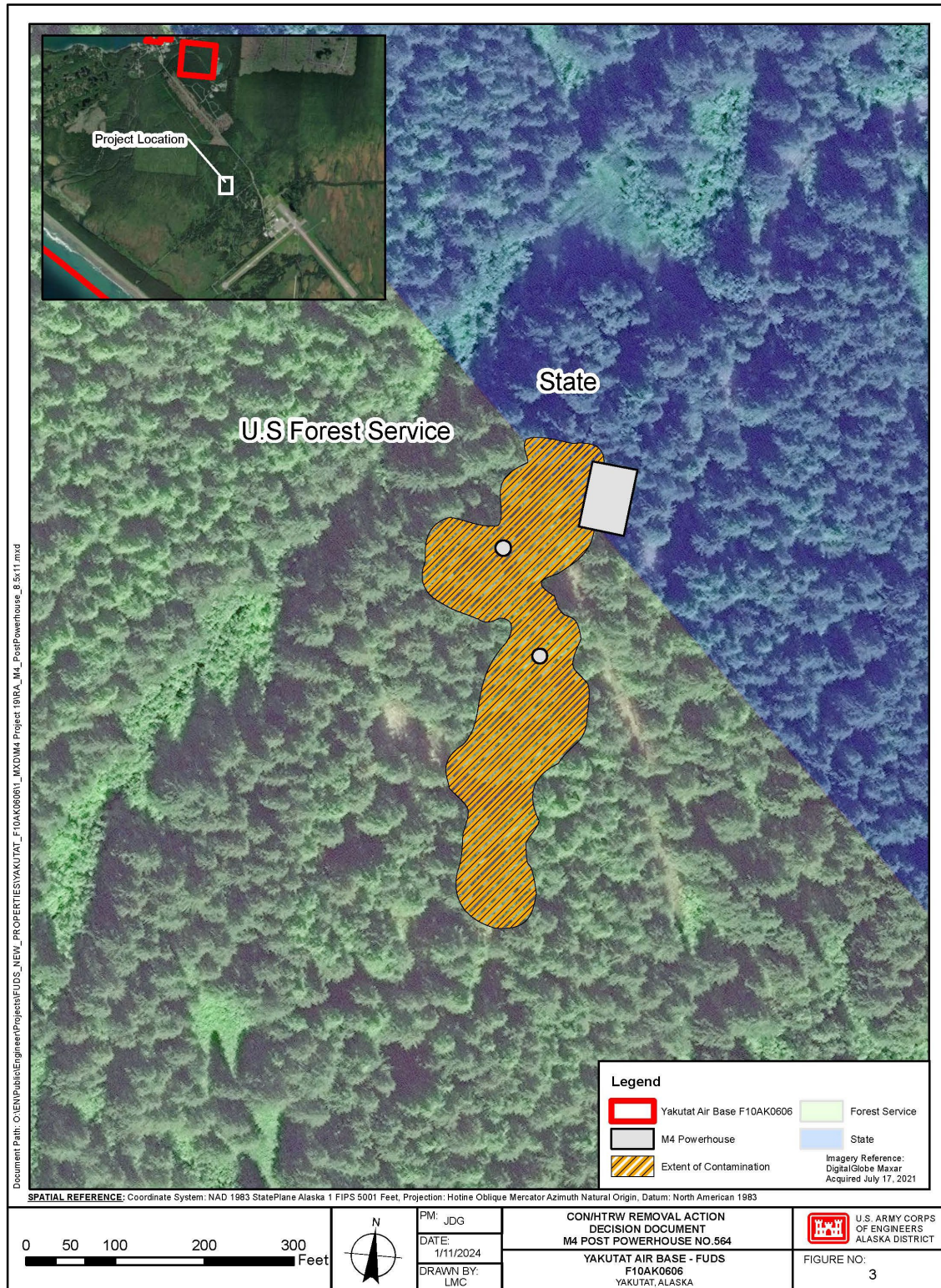


Figure 3. Estimated extent of soil and groundwater contamination remaining at AOC M4 (adapted from USACE 2019).

1.3 Need for Action

Previous remedial investigations identified fuel contamination of soil exceeding State of Alaska soil cleanup levels at AOC M4 which pose an imminent and substantial endangerment (ISE) in accordance with DERP. The USACE is required to evaluate remedial actions at the former Yakutat Air Base under its DERP-FUDS authority.

2.0 ALTERNATIVES

2.1 No-Action Alternative (Alternative 1)

Under the no-action alternative, the known contaminated soil would remain in place. This would potentially allow the migration of chemical contaminants to nearby habitat and water sources. The Imminent and Substantial Endangerment to human health or the environment would also remain. 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 Action Alternatives

2.2.1 Excavation and Onsite Thermal Desorption (Alternative 2)

The second proposed alternative is removal by excavation and onsite remediation through a thermal desorption process. The excavated soil would be trucked to a constructed stockpile where a thermal desorption worker would insert heating elements into the stockpile, which would subsequently remediate the contaminated soil. Soil stockpile heating would continue until such time as target cleanup levels are confirmed by collecting soil samples for analysis at an offsite laboratory. Remediated soil would be reused as backfill for the excavation. Restoration of the area would include grading and contouring to match the surrounding land and revegetation. Excavation and treatment of contaminated soil is expected to improve groundwater quality by removing the source of contamination. Monitoring wells will be installed and sampled to evaluate groundwater quality after excavation is backfilled and graded. If groundwater contaminants exceed applicable cleanup levels, a second round of sampling would be conducted the following year. If groundwater is below cleanup levels for either sampling event, monitoring wells will be decommissioned and the site will be closed. Otherwise, wells will be left in place for future groundwater monitoring. This alternative relies on significant manpower to operate the soil stockpile treatment unit and collect soil samples. It would also require fuel to power the treatment unit and a nearby location large enough to store and treat up to 36,000 tons of contaminated soil. Furthermore, an excavation over 1.5 acres in size, approximately 8-10 ft deep would remain open and create a risk to humans and wildlife in the area while soil is treated. The implementability of this alternative is difficult and poses a higher risk of failure compared to Alternative 3. It is feasible to meet applicable cleanup levels using the thermal desorption alternative. The duration necessary to

achieve applicable cleanup levels is estimated to be approximately 121 days after soil has been transported and placed in the treatment cell, however, movement of treated soil is season dependent and cannot be conducted until Summer or Fall following treatment (USACE 2023b).

2.2.2 Excavation with Offsite Disposal (Alternative 3)

The third proposed alternative is excavation, containerization, transportation, and disposal of contaminated soil at an offsite location. The method requires soil from the contaminated area to be excavated, and continuously field screened using a photo ionization detector for segregation into potentially clean and contaminated stockpiles. Groundwater in the contaminated soil area is shallow, so stockpiled soil would be placed on top of plastic liners that direct drainage of excess water back into excavation. Rocks and uncontaminated soil would be stored in a separate stockpiled area to be used for backfilling once the project is complete. An onsite mobile field lab would run same-day samples collected from the excavated area to ensure successful removal of contaminated soil to the applicable cleanup levels. Once clean excavation margins are reached, confirmation samples would be sent to a fixed-base analytical lab for formal reporting purposes. The excavation will be backfilled using an uncontaminated local fill source and confirmed clean stockpiled soil and rock. Restoration of the area would include grading and contouring to match the surrounding land and revegetation. Removal of contaminated soil and replacement with a local clean fill source is expected to improve groundwater quality. Monitoring wells will be installed and sampled to evaluate groundwater quality after the excavation is backfilled. If groundwater contaminants exceed applicable cleanup levels, a second round of sampling would be conducted the following year. If groundwater is below cleanup levels for either sampling event, monitoring wells will be decommissioned and the site will be closed. Otherwise, wells will be left in place for future groundwater monitoring. The implementability of this alternative is high as it is a common, low complexity method for remediating relatively shallow contamination. Applicable cleanup levels are expected to be met during the same year as the removal of contaminated soil, as clean fill will be obtained from a local source immediately following excavation activities. It is feasible to excavate, containerize, transport, and dispose of contaminated soils at permitted landfill facilities located in Oregon and Washington and local sources of backfill in sufficient quantities have been identified. Materials, equipment, personnel, and transportation sources are available and in accordance with standard industry practice (USACE 2023b).

2.2.3 Preferred Alternative

Alternative 3 – Excavation with Offsite Disposal is the USACE's preferred alternative; it is protective of human health and the environment and complies with pertinent risk-

based standards for petroleum hydrocarbons. The remedy is cost-effective and utilizes a permanent solution to the maximum extent practicable (USACE 2023b).

The preferred alternative would involve the following activities at the project site:

- Mobilization of equipment, supplies, materials, and personnel to and from the work site, and transport of waste and contaminated materials from the site;
- Improvement of existing roads and trails to allow for vehicular and heavy equipment movement to and from the site. Improvements may include replacing, and installing culverts, improving/creating vehicle pullouts and turnarounds, and placing gravel to create a stable road surface;
- Necessary brushing and clearing of trees needed to provide site access and a safe work site;
- Decommissioning of nine existing groundwater monitoring wells within the proposed excavation area;
- Excavating, containerizing, transporting, and properly disposing of approximately 24,000 – 36,000 tons of POL-contaminated soil. The contaminated soil would be taken to an approved landfill or other disposal facility, or treated on-site if the contractor proposes an acceptable method.
- Collecting soil and water samples for field-screening and laboratory analyses;
- Backfilling all excavations with fill from a clean local source and contoured to match the surrounding grade and existing drainage. Topsoil will be used as the top layer of the backfilled excavation and must be from a clean source; site topsoil reserved from the excavation and determined to be clean may be used. Topsoil would be spread to a minimum depth of 6" across the backfilled excavation.
- Re-seeding the disturbed areas with a weed free native grass seed mixture approved by USACE and the USFS.

2.3 General Work Practices and Environmental Protection

The project contractor will prepare a detailed and comprehensive work plan for all tasks to be performed. Included in the work plan will be the following documents related to minimization of project impacts to the environment:

- Environmental Protection Plan (EPP);
- Waste Management Plan;
- Storm Water Pollution Prevention Plan (SWPPP); and
- Road Maintenance and Protection Plan.

The EPP will include, but not be limited to, the following:

- A list of Federal, State, and local laws, regulations, and permits concerning environmental protection, pollution control, and pollution abatement that are

applicable to the contractor's proposed operations and the requirements imposed by those laws, regulations, and permits.

- Methods for protection of features to be preserved within authorized work areas, as applicable (trees, shrubs, grasses and ground cover, landscape features, air and water quality, fish and wildlife, soil, and historical, archaeological, and cultural resources).
- Procedures to provide the required environmental protection, to comply with the applicable laws and regulations, and to correct pollution due to accident, natural causes, or failure to follow the procedures of the Environmental Protection Plan.
- Plan showing the proposed activity in each portion of the work area and identifying the areas of limited use or nonuse. Plan should include measures for marking the limits of use areas and drawings showing locations of all proposed sampling, excavations, material storage areas, structures, sanitary facilities, and stockpiles of excess or spoil materials.
- Spill prevention and spill cleanup plans.
- If, during work activities, the contractor observes items that might have historical or archaeological value, such observations shall be reported immediately to the contracting officer so that the appropriate authorities may be notified and a determination can be made as to their significance and what, if any, special disposition of the finds should be made. The contractor shall cease all activities that may result in the destruction of these resources and shall prevent its employees from trespassing on, removing or otherwise damaging such resources.

All vegetation cleared from the existing roads, access points, and excavation area shall be disposed of by scattering it in such a manner that it does not block drainage features such as ditches, stream channels and swales. Felled timber shall be scattered or made available to the local community for use if agreed upon by the landowner. Grubbing and disturbance outside the excavation area shall be kept to a minimum.

3.0 AFFECTED ENVIRONMENT

3.1 Community

Yakutat is located on the Gulf of Alaska lowlands adjacent to Yakutat Bay, about 225 miles northwest of Juneau, Alaska. The community is accessible only by air or ocean-going vessel. The greater Yakutat area (Yakutat Borough) has an estimated population of 662 as of 2020. The local economy is driven by fishing, hunting, guiding, chartering, employment by State and Federal agencies, commercial fishing, mining, and subsistence hunting, fishing, and gathering. The area maintains a traditional Tlingit

culture with influences from Eyak Athabascans, as well as Russian, English, and American traders and miners. About 43 percent of the population is Alaska Native solely or in combination with another ethnicity (ADCRA 2023).

3.2 Current Land Use

The lands of the former Yakutat Air Base are currently managed or owned by the Alaska Department of Transportation and Public Facilities (ADOT&PF), the USFS, the U.S. Bureau of Land Management (BLM), the City and Borough of Yakutat (CBY), the Alaska Department of Natural Resources (ADNR) Mental Health Trust Land Office, private owners, Native allotments, Yak-Tat Kwaan, Inc, and Sealaska Corporation. The current Yakutat Airport occupies much of the same footprint as the original military airfield and is operated by the ADOT&PF. The lands surrounding the airport are primarily part of Tongass National Forest, administered by the USFS. Beyond the current airfield complex, the general area is little developed (USACE 2020).

3.3 Climate

Yakutat's climate is dominated by maritime conditions due to its proximity to the coast. Meteorological data for Yakutat from 1952 to 2000 indicate a yearly average temperature of 39.5 degrees Fahrenheit (°F), with maximum summer temperatures of up to 87 °F and winter temperatures down to -24 °F. January exhibits the lowest monthly mean temperature at 26 °F. The highest monthly mean temperature of 54 °F is in July. The yearly average precipitation is approximately 140 inches, including over 200 inches of snowfall. Precipitation infiltration and runoff both occur during breakup when the winter snowpack melts. Wind in the Yakutat area is generally from the west, from the Gulf of Alaska. In winter, these winds are more likely to blow east/northeast and in summer east/southeast. Surface wind velocities average 7 miles per hour (ADCRA 2023).

3.4 Topography, Soils, and Hydrology

Yakutat is located on the Yakutat foreland, a gently sloping glacial outwash plain between the Saint Elias Mountains and the Gulf of Alaska. Eight dominant surficial deposits have been mapped in the Yakutat area, all Holocene age. These include artificial fill, organic, eolian, beach, delta-estuarine, alluvial, outwash, and moraine deposits. Artificial fill is mostly present under the airport runways and other areas that were extensively modified during construction. Soils at the AOC M4 – Post Powerhouse site consist of organic material underlain by mixtures of poorly graded and well graded sands, with varying amounts of gravel (USACE 2020).

Unconfined groundwater in the Yakutat area ranges in depth from within the top 10 feet below ground surface (bgs) to greater than 70 feet bgs. This fluctuation appears to be a function of surface topography, as the piezometric groundwater surface is relatively flat. At the AOC M4 – Post Powerhouse, groundwater occurs between 1 and 6 feet bgs and

is heavily influenced by precipitation; the groundwater gradient in the M4 area flows generally toward the south (USACE 2020).

3.5 Air Quality and Noise

Yakutat area presumably enjoys good air quality due to the low number of emission sources and persistent winds from the nearby ocean. 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. Potential sources of air pollution in the project area would be limited to emissions from planes using the nearby airport and particulates lofted from unpaved roads. Local emissions from wood and oil stoves, burning distillate oil, industrial sources, and mobile emissions contribute to particulate pollution.

No specific noise data exist for Yakutat, but it is probably comparable with other small coastal Alaskan communities. Air traffic, boat traffic, vehicles, construction equipment, and generators are the most likely sources of man-made noise.

3.6 Habitat and Wildlife

The main terrestrial vegetative community in the Yakutat area is coastal western hemlock-Sitka spruce forest. The coastal forest consists of three plant communities: true forest, grass-sedge meadows, and muskeg. The dominant tree species in the true forest are western hemlock, Sitka spruce, Alaska cedar, and western red cedar. Understory vegetation is represented by alder shrubs and moss. Wetland habitats and ponds along glacial moraines are dominated by sedges, mosses, and low shrubs. Wetlands along streams are dominated by tall willows, alder, sedges, mosses, and low shrubs. Low lying muskegs are dominated by thick mats of sphagnum moss, sedges, herbs, and low shrubs (USFS 2022a, 2022b).

Black bear and brown bear are common in the Yakutat region, along with deer, moose, mountain goat, wolf, and wolverine. Other mammals known to inhabit the area include marten, land otter, fox, ermine, lynx, coyote, and weasel. The Yakutat area is on a major flyway for migratory songbirds, waterfowl, and shorebirds, and is important for nesting bald eagles and swans (USFS 2022a, 2022b).

Area streams support all five species of Alaska salmon (red, chum, pink, king and coho), along with steelhead trout, cutthroat trout, Dolly Varden, northern pike, and rainbow trout. Salmon are known to spawn in drainage ditches and other water bodies adjacent to the airport runway; a 2023 habitat survey noted four species of fish in the project vicinity: threespine stickleback, coho salmon, cutthroat trout, and Dolly Varden trout (see Section 3.9). Many of the lakes, especially the larger lakes such as

3.7 Wetlands

FISH AND AVIAN HABITAT SURVEY, YAKUTAT AIR BASE FORMERLY USED DEFENSE SITE F10AK0606-10 (M4) YAKUTAT, ALASKA

YAKUTAT AIR BASE FUDS M4 FISH AND AVIAN HABITAT SURVEY AREA

Legend

- Trap
- Coho Captured
- Site Access Route
- Anadromous Stream
- Upland
- Water
- Wetland
- Approximate Removal Action Boundary
- Survey Area Boundary (660-foot buffer)

NWI Description

Waters	Wetlands	Uplands
R2UBH - Riverine Lower Perennial Permanently Flooded Unconsolidated Bottom	P8810 - Palustrine Seasonally Flooded Broad-leaved Deciduous Scrub-Shrub	U - Upland
PUBH - Palustrine Permanently Flooded Unconsolidated Bottom	PFO4/SS1C - Palustrine Seasonally Flooded Needle-leaved Evergreen Forest/Broad-leaved Deciduous Scrub-Shrub	
	PFO4B - Palustrine Seasonally Saturated Needle-leaved Evergreen Forest	

Notes

- For conceptual purposes only. All locations are approximate.
- Map produced using ESRI ArcMap v. 10.7.

References

- Imagery source: Pleiades 1A Image collected June 9, 2016.

UTM COORDINATE SYSTEM ZONE 19N, METERS
HORIZONTAL DATUM: NAD 83 1984 VERTICAL DATUM: MGS 1984

SCALE IN FEET

11



Figure 5. Wetlands survey of project area (adapted from USACE 2024).

Scattered surface water was present throughout these communities. Closed canopy tall alder and willow obscured all small streams in the study area, and the R2UBH wetlands in the western side of the study area are presumed to originate north of the study area. Uplands were limited to developed areas with robust Sitka spruce. All wetlands and waters in the study area eventually connect to the Gulf of Alaska either through the Cannon Beach Road ditch, or the small wetland areas extending to Tawah Creek, which then flows into the Gulf of Alaska. Old access roads and structures are present in the study area, which all appear to have been cleared and graded but not filled, and no culverts were observed (USACE 2024).

3.8 Protected Species

Endangered Species Act. No species listed under the Endangered Species Act (ESA) are in or near the project area according to information made available online by the U.S. Fish and Wildlife Service (USFWS; USFWS 2023) or National Oceanic and Atmospheric Administration (NOAA; NOAA 2024).

Bald and Golden Eagle Protection Act. The Yakutat coastal area provides habitat for many bald eagles, which 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 2007). The 2023 habitat survey did not identify any eagle nests in or near the project area (USACE 2024).

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 2017).

3.9 Anadromous Streams and Essential Fish Habitat

Several streams listed in the Alaska Department of Fish & Game (ADFG) Anadromous Waters Catalog (AWC; ADFG 2024) exist in the general project area (see Figure 6). The stream paralleling Cannon Beach Road is cataloged as 182-80-10100-2005-3014, and documented as providing spawning habitat for coho salmon (*Oncorhynchus kisutch*) pink salmon (*Oncorhynchus gorbuscha*), and eulachon smelt (*Thaleichthys pacificus*).

Four fish species were caught and identified during the 2023 fish habitat survey. The threespine stickleback (*Gasterosteus aculeatus*) was the most abundant species caught, followed by the coho salmon, the cutthroat trout (*Oncorhynchus clarkii*), and the Dolly Varden trout (*Salvelinus malma*). The threespine stickleback was caught in the six traps set in ponded water. Coho salmon were caught in 9 of the 10 traps in both ponded and flowing water. Cutthroat trout were caught in 4 of the 10 traps and the single Dolly

Varden trout was caught in the most downstream trap in an unnamed flowing stream (USACE 2024). There is no marine essential fish habitat (EFH) as defined by the Magnuson Stevens Fishery Conservation and Management Act at this inland site.

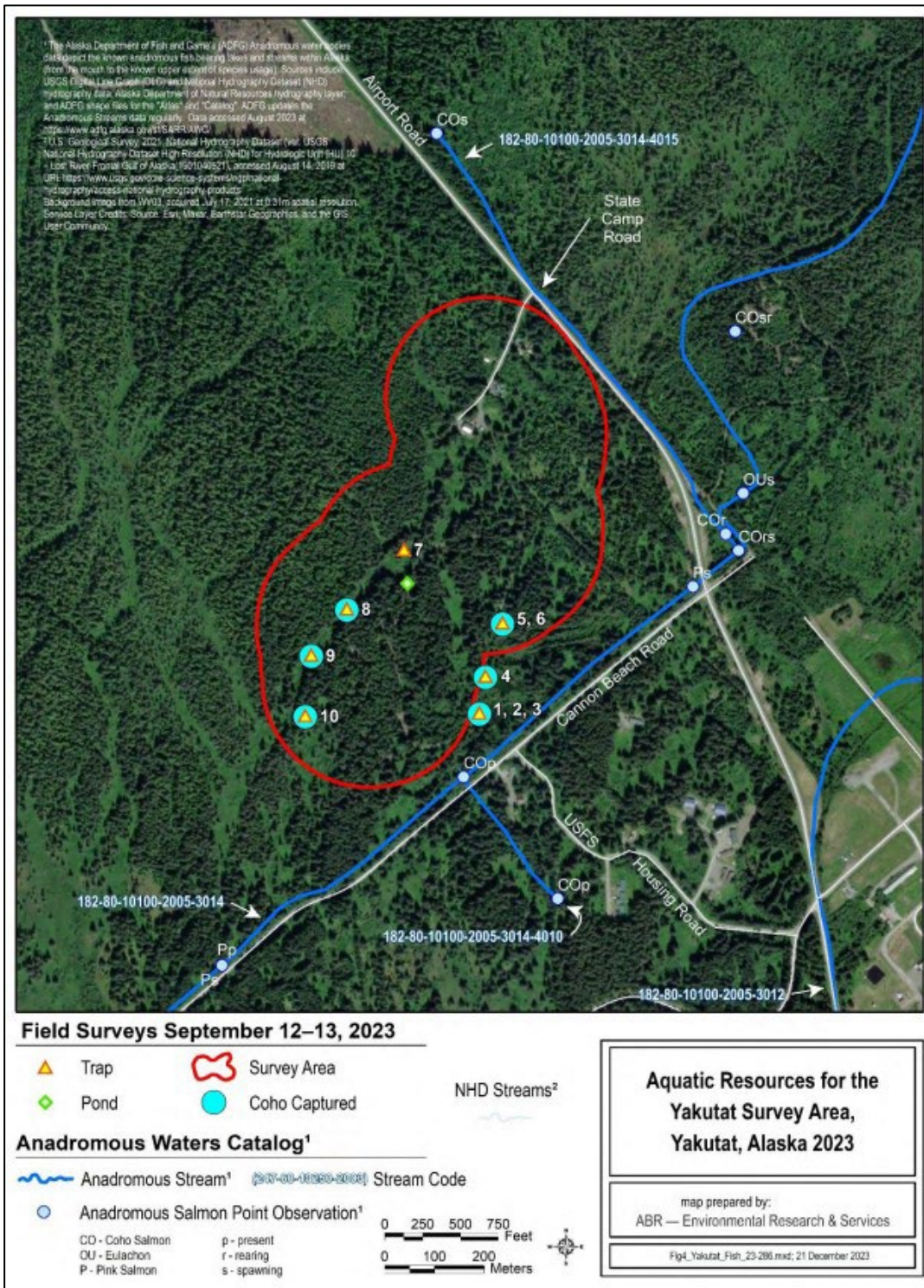


Figure 6. Aquatic habitat 2023 survey results (adapted from USACE 2024).

3.10 Cultural and Historic Resources

The USACE conducted an archaeological survey of the area of potential effect (APE) in 2019 and during a site visit in 2021. A review of the Alaska Heritage Resources Survey (AHRS) database shows that there is one known historic property within the APE, the Air Corps Increase Group No. 1 (YAK-00129; Table 1). Two other sites, Signal Road (State Camp Road, YAK-00122) and 28th Engineer Road (Airport Road, YAK-00117) are also within the APE but have been determined to not be eligible for listing in the National Register of Historic Places (NRHP). The Air Corps Increase Group No. 1 was determined eligible for listing in the NRHP under Criteria A and D in 2020 (USACE 2020). In 2020 and 2021 most of the remaining features at the site were destroyed during cleanup activities conducted under the Native American Lands Environmental Mitigation Program (NALEMP). Four features remain at the site: one standing Armco Hut, two AST concrete foundation pads, and the remnants of the post powerhouse which consists of a concrete foundation and associated structural remains and artifacts that include boilers and a collapsed chimney stack (USACE 2023a).

Table 1. Known cultural resources in the general vicinity of APE.

AHRS No.	Site Name	NRHP Status	In APE
YAK-00109	Air Corps Road	Not Eligible	No
YAK-00117	28 th Engineer Road	Not Eligible	Yes
YAK-00122	Signal Road (State Camp Road)	Not Eligible	Yes
YAK-00129	Air Corps Increase Group No. 1	Eligible	Yes

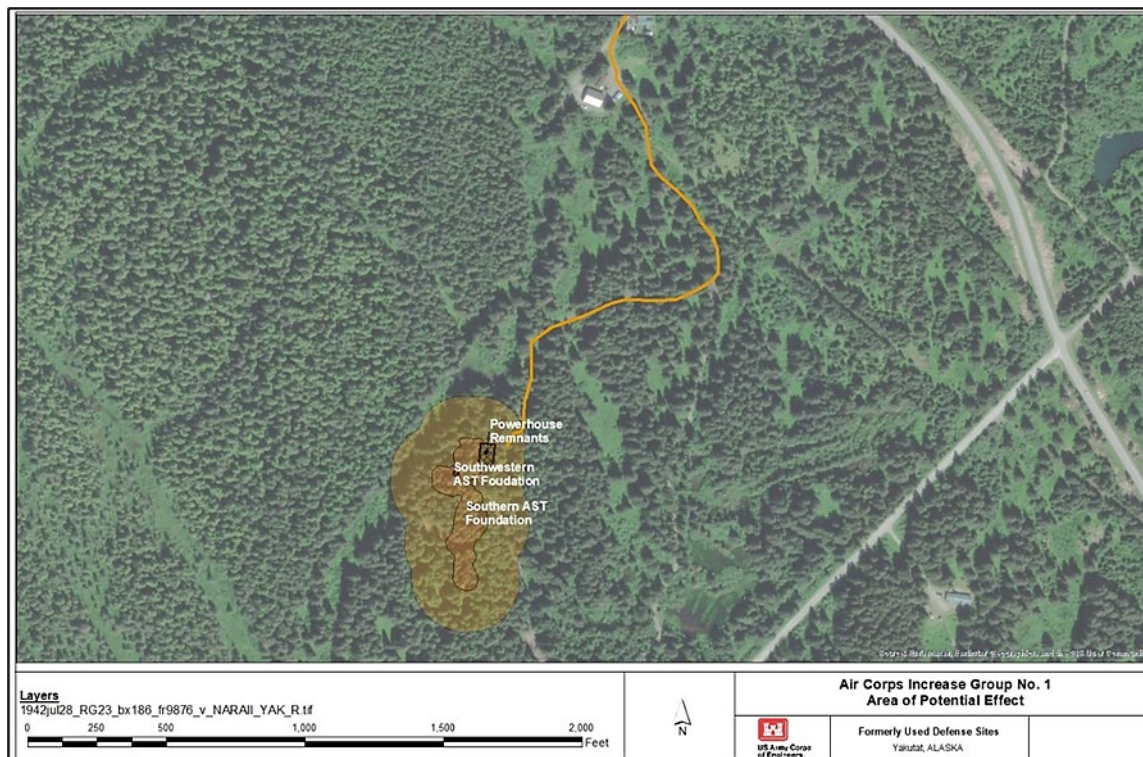


Figure 7. Area of potential effect (APE) on cultural resources (from USACE 2023a).

4.0 ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVES

4.1 No-Action Alternative

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. However, the contaminated soil and waste materials would remain in place, which would limit use of the area by the community and potentially allow the migration of chemical contaminants to the nearby environment.

4.2 Remedial Alternatives

Under the remedial alternatives, contaminants would be removed from the site to the extent practicable. The primary difference between onsite remediation (Alternative 2) and offsite disposal (Alternative 3) would be the types and duration of on-site activities (see Sections 2.2.2 and 2.2.3).

4.2.1 Effects on Community and Land Use

The project site is in an area used for subsistence gathering, although generally not frequented by the general public. The project will cause an increase in truck and equipment traffic on local roads, which may briefly affect the use of those roads by local

residents; however, blocking of roads or rerouting of traffic should not be necessary. Alternative 2 would avoid the truck traffic needed to transport contaminated soil off-site (as required by Alternative 3), but this would be offset by the additional traffic needed to transport thermal desorption equipment to and from the project area, and the additional site access needed to conduct the on-site remediation.

4.2.2 Effects on Air Quality and Noise

Air quality may be affected during the project period from the use of heavy equipment, construction vehicles, and generators. Any increase in pollutant emissions caused by the project would be transient, highly localized, and would dissipate entirely at the completion of the project. The area is not in a Clean Air Act (CAA) “non-attainment” area, and the conformity determination requirements of the CAA would not apply to the proposed project at this time. The operation of the thermal desorption equipment under Alternative 2 would represent a new source of air emissions at the project site that would require further evaluation, and perhaps permitting by the State of Alaska.

The project sites are not near any residences. The noise generated by project activities will be comparable to moderate construction noise and should not disrupt human activity.

4.2.3 Effects on Topography, Soils, and Hydrology

The areas of excavation would be small (approximately three acres) and backfill would be contoured to approximate the existing grade. The project will not significantly alter the topography or patterns of overland water flow in the area.

4.2.4 Effects on Habitat and Wildlife

The planned activities would be highly localized in their impacts and affect an area already altered by the former military construction and past cleanup efforts. Some brush may need to be cleared, primarily along existing trails, to access project locations. The project sites will be restored to the extent practical. Alternative 2 may have a marginally greater impact on habitat and wildlife than Alternative 3, as the thermal desorption equipment will require additional cleared land, and the on-site remediation will require a longer duration of human activity at the project site. The backfilled and contoured excavation sites will be revegetated in accordance with USFS guidance as described above. The planned activities may displace some wildlife from the sites while work is ongoing. The project sites are surrounded by 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. In the longer term, the project will improve wildlife habitat by removing hazards such as containerized waste and contaminated soil.

4.2.5 Effects on Wetlands

As discussed in Section 3.7, much (86%) of the project area has been identified as wetlands (USACE 2024). The proposed excavation area includes fill that was placed during construction of the facilities; these soils would not be wetlands. However, contamination is believed to have spread into areas of native soil, which have been identified as wetlands. The intent of the remedial action is to excavate contaminated soil until clean limits (as determined by field screening and confirmation sampling) are reached. Where backfill is placed in excavations that have extended into wetlands, that fill would constitute a discharge under Section 404 of the Clean Water Act (CWA). The Corps, which is the enforcement authority for Section 404, does not issue itself CWA permits for its activities. However, the Corps incorporates by reference (in accordance with 40 CFR 1501.12) the analyses under NEPA and CWA Section 404(b)(1) performed in 2021 for the reissuance of Nationwide Permit No. 38, "Cleanup of Hazardous and Toxic Waste": "Specific activities required to effect the containment, stabilization, or removal of hazardous or toxic waste materials that are performed, ordered, or sponsored by a government agency with established legal or regulatory authority". In accordance with Section 401 of the Clean Water Act, the State of Alaska Department of Environmental Conservation issued a Certificate of Reasonable Assurance for all U.S. Army Corps of Engineers Nationwide Permits (NWPs), so no separate Section 401 Certificate of Reasonable Assurance is required for the Yakutat Air Base remedial action, which falls within the scope and intent of NWP No. 38. The Pre-Construction Notification (PCN) required under General Condition 31 to this NWP does not apply to this project, as the District Engineer represents the action agency.

The removal of chemical contaminants from the project site is a remedial action intended to benefit the overall environment, and the Corps does not intend to mitigate for or attempt to restore the small, discontinuous areas of wetlands that may be lost in the course of the project excavation and backfilling activities.

4.2.6 Effects on Protected Species

The proposed action will have no effect on ESA-listed species, as none are present at or near the project sites.

The presence of nesting bald eagles at or near the project sites is a possibility, although an eagle nest survey conducted in 2023 found no sign of active or inactive eagle nests. The bald eagle nesting season in Alaska can extend from February through August. The contractor will survey the areas surrounding the project site for potential bald eagle nests prior to remedial activities. USFWS guidance (USFWS 2007) calls for allowing moderately noisy and disruptive activities no closer than 660 feet from an active nest if that nest is visible from the work site, or 330 feet if the nest cannot be seen from the work site.

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 15 April through 15 July should be considered the nesting window for birds nesting in forest or woodland, and 1 May through 15 July for birds nesting in scrub or open land in Southeast Alaska (USFWS 2009) and that any brush-clearing activities should be scheduled for prior to or after this window. The project remedial activities may overlap this nesting window. If the nesting window cannot be avoided, work areas will be examined for bird nests prior to project activities. Any active nests will be avoided and protected. Tree removal and grubbing for site access and the excavation area will be conducted in during fall months, to mitigate impacts to active bird nests during the USFWS advised nesting periods for both forest or woodland and scrub or open lands in Southeast Alaska.

4.2.7 Effects on Essential Fish Habitat and Anadromous Streams

The project will not require entry into or permanent alteration of waterways, although the contractor may place fill and install temporary culverts to redirect ponding water from roads. A Storm Water Pollution Prevention Plan (SWPPP) will prescribe a series of Best Management Practices (BMPs) such as silt fencing or other appropriate sediment and erosion controls to be employed that minimize the risk of runoff reaching streams during excavation. The intent of the project is to remove sources of contamination from the environment and should have a net positive effect on area fish habitat. There is no marine EFH in the project area, and the USACE determines that the project would have no adverse effects on fish habitat.

4.2.8 Effects on Cultural Resources

The USACE determined that the proposed undertaking will have an adverse effect on the Air Corps Increase Group No. 1 (YAK-000129) site, as excavation of the contaminated soil plume will result in the removal of the two remaining AST pads and Post Powerhouse No. 564 foundation. In a letter to the State Historic Preservation Office (SHPO) dated 24 July 2023 (USACE 2023a), the USACE sought concurrence on its determinations that the proposed undertaking will result in an adverse effect to the Air Corps Increase Group No. 1 (YAK-00129) site, but result in no effect on historic properties for YAK-00117 and YAK-0122. The USACE also proposed to enter into a Memorandum of Agreement (MOA) to resolve adverse effects to the Air Corps Increase Group No. 1 site.

The SHPO concurred with the USACE finding of adverse effect and proposal to develop a MOA, in a letter dated 23 August 2023. As of January 2024, USACE is in the process of drafting a Memorandum of Agreement to resolve the proposed adverse effects. The ACHP has declined to participate in the crafting of a memorandum of agreement. Signatories to the Memorandum of Agreement are USACE, SHPO, USFS, and ADOT&PF.

4.2.9 Environmental Justice Considerations

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 future 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 to the human population.

4.2.10 Cumulative Effects Considerations

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 immediate incremental impacts of air pollutants and noise from construction machinery would be of short duration and would not contribute to long-term cumulative effects. The removal of chemical contamination from the project area may improve the feasibility of future development of the privately-owned land.

4.2.11 Coastal Zone Management Considerations

Alaska withdrew from the voluntary National Coastal Zone Management Program 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.

5.0 PERMITS AND AUTHORIZATIONS

This project would require several environmental permits and authorizations. The contractor shall obtain coverage under an Alaska Pollutant Discharge Elimination System (APDES) permit for their storm water discharges, submit a Storm Water Pollution Prevention Plan (SWPPP), and maintain a Certified Erosion and Sediment Control Lead (CESCL) onsite. Installation of culverts may require an ADFG Fish Habitat permit, depending on the location and extent of the activity. No agency coordination is required under the ESA. Incidental discharges to wetlands at the project sites in the course of remediating those sites are authorized under CWA Nationwide Permit #38. The Corps has concurrence from the State Historical Preservation Officer that adverse effects from the proposed work will be mitigated through a Memorandum of Agreement. The contractor will follow USFWS guidance on avoiding takes under the Migratory Bird Treaty Act, will survey the surrounding area for potential eagle nests prior to the start of work, and report the siting of any potential nests to the USACE for further evaluation

and coordination. The project proximity to Yakutat Airport may require a construction permit from the Federal Aviation Administration (FAA) and/or the State Department of Transportation and Public Facilities (DOT-PF).

6.0 CONCLUSION

The proposed environmental cleanup project at the former Yakutat Air Base, as discussed in this document, would have some minor, largely controllable short-term impacts, but in the long term would 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 of the Environmental Resources Section, Alaska District, U.S. Army Corps of Engineers. The Corps of Engineers Project Manager is Jamie Grant.

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