Alaska District
U.S. Army Corps of Engineers

Environmental Resources Section

Public Notice

Date **9 Feb 2026** Identification No. **ER-PN-26-01**
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:

Containerized Hazardous, Toxic, and Radiological Waste (CON/HTRW) Removal Action – 2027 Unalga Island, 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
ATTN: CEPOA-PM-C-ER (Floyd)
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.

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Michael Rouse
Acting Chief, Civil Works Branch
USACE, Alaska District

US Army Corps of Engineers
Alaska District

Environmental Assessment and Finding of No Significant Impact

CON/HTRW Removal Action – 2027
Unalga Island, Alaska

Formerly Used Defense Sites Program
(F10AK001502)

February 2026

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 (USACE) has assessed the environmental effects of the following action:

CON/HTRW Removal Action
Formerly Used Defense Sites
Unalga Island, Alaska

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.

This USACE action complies with the National Historic Preservation Act, the Endangered Species Act, the Marine Mammal Protection 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 Unalga Island.

_____ _____

Jeffrey S. Palazzini Date
Colonel, USACE of Engineers
District Commander

Environmental Assessment

1.0 PURPOSE AND NEED OF REMEDIAL ACTION

1.1 Introduction

The U.S. Army Corps of Engineers (USACE) prepared this environmental assessment (EA) under the National Environmental Policy Act (NEPA) to address the removal of containerized waste and contaminated soil at former military facilities on Unalga Island, Alaska. The proposed actions are authorized under the Department of Defense (DOD) Environmental Restoration Program - Formerly Used Defense Sites (DERP-FUDS), which provides the means to clean up waste materials, contaminated soil, and unsafe structures and debris from areas formerly used by the DOD. 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 removal of containerized waste and petroleum products, both of which fall outside the purview of CERCLA.

1.2 Site Description and History

Unalga Island is an 11-square-mile uninhabited island located between Unalaska and Akutan Islands in the eastern Aleutian Chain of Alaska (not to be confused with a second, smaller "Unalga Island" located roughly 566 miles to the west in the Andreanof Islands group).

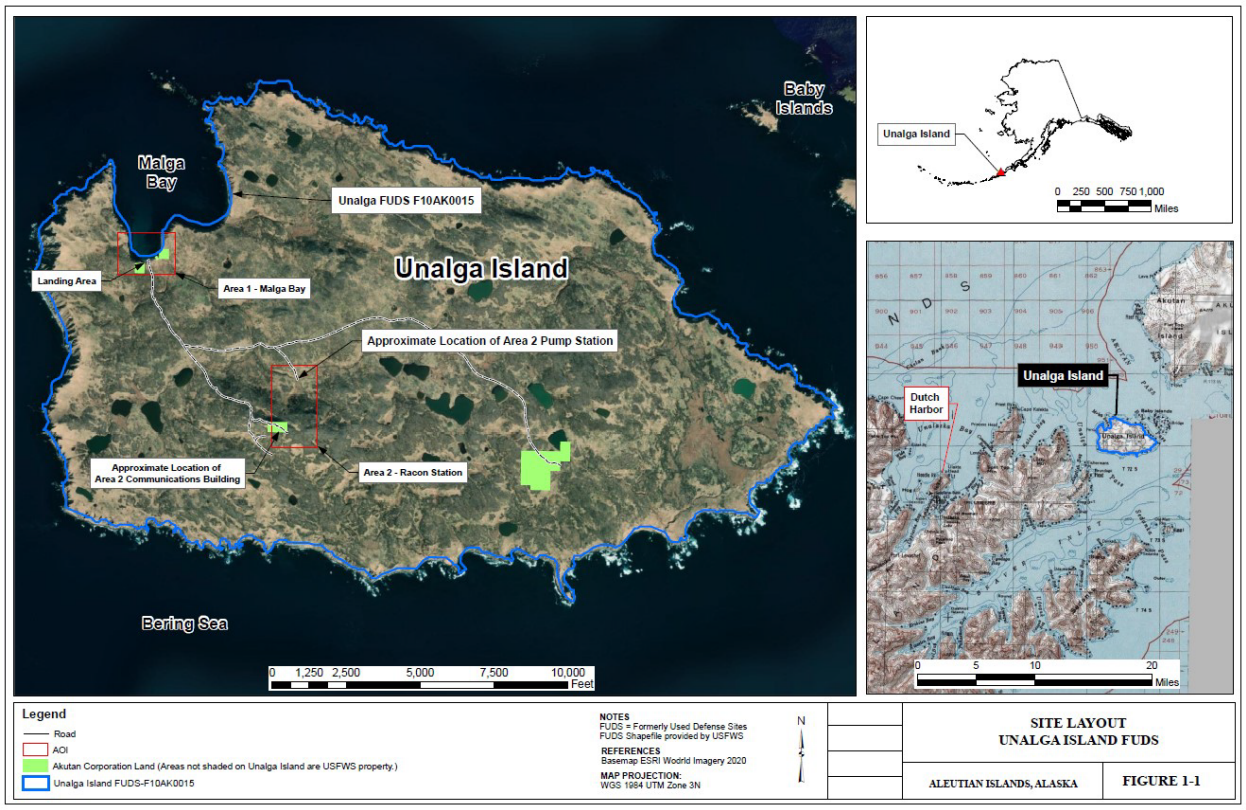

Figure 1. Location and vicinity of Unalga Island, Alaska.

The first military construction at Unalga Island was a U.S. Navy radio station, built in 1912 but decommissioned in 1915 due to poor radio reception and the difficulties of supplying and

maintaining the installation. In 1942, a presidential executive order reserved Umnak, Unalaska, and adjacent smaller islands (to include Unalga Island) for military purposes. The U.S. Navy began construction in September 1942 of the Unalga Radio Range Station at Lake Edna on the southeastern uplands of the island. Due to the presence of high cliffs along most of the coastline, all supplies and equipment were landed at Malga Bay on the northwestern shore of the island. A road was built from Malga Bay to the Radio Range Station. By January 1943, the road had been extended from Malga Bay to the top of Mountain 707, where the U.S. Navy built a small Radar Beacon (Racon) Station. Both the Radio Range Station and the Racon Station were decommissioned in 1945 (USACE 2024).

USACE conducted site visits in 1986, 1988, and 2017, and environmental cleanup actions in 2019 and 2022. The 2019 action removed approximately 1,320 tons of petroleum oil lubricant (POL)-contaminated soil, 16.25 tons of 55-gallon drum remnants, 1.145 tons of broken lead-acid battery plates and lead-shield wire, and 24.5 tons of lead-contaminated soil from three former military areas on Unalga Island. In 2022, USACE and its contractors removed an additional 1,900 tons of POL-contaminated soil from the three former military areas (USACE 2024).

1.3 Need for Action

The final report for the 2022 removal action (USACE 2024) notes that up to roughly 2,000 tons of POL-contaminated soil remain at the Malga Bay (Area 1) site. In addition, a reported petroleum sheen in a creek is suspected to be caused by POL contamination remaining next to a small concrete slab (the foundation of a former pump station). Further contamination removal is required to meet State of Alaska environmental cleanup standards (USACE 2026).

2.0 ALTERNATIVES

2.1 Alternative 1 – No-Action

The no-action alternative would avoid the short-term disruptions to the local environment that would be caused by the excavation of soil. However, under the no-action alternative, the contaminated soil would remain in place. Natural attenuation of the petroleum contamination can be expected, but attenuation to concentrations below regulatory limits would require an unknown period of time. This would potentially allow the migration of chemical contaminants to adjacent wetland and marine habitat. The ADEC is unlikely to allow the administrative closure of the site with no action or controls, calling into doubt the implementability of this alternative (USACE 2026).

2.2 Alternative 2 – Land Use Controls

The second proposed alternative is the implementation of land use controls. Landowner notifications would be conducted every 5 years with the U.S. Fish and Wildlife Service (USFWS) and Akutan Corporation in the form of information pamphlets and recurring checks to confirm that land use designation has not changed. The implementability of this alternative is unlikely because it would fail to achieve cleanup standards (USACE 2026).

2.3 Alternative 3 – Excavation with Offsite Disposal

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 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. Rock and uncontaminated soil would be stored in a separate stockpiled area and will be returned to the excavation once the project is complete. Once potentially clean excavation margins are reached, confirmation samples would be sent to a fixed-base analytical lab. The excavation will not be backfilled but will be graded to promote positive drainage, reduce ponding, and match the existing topography, to the extent practicable. It is expected that some contaminated soil will remain in place as contamination extends past the groundwater interface and will not be able to be excavated. Assuming that groundwater is not contaminated exceeding cleanup levels following excavation of soil, the remedial action construction (RmA-C) phase and the project will be closed. The implementability of this alternative is high as it is a common, low complexity method for remediating relatively shallow contamination. It is feasible to excavate, containerize, transport, and dispose of contaminated soils at permitted landfill facilities located in Oregon or Washington. Materials, equipment, personnel, and transportation sources are available and in accordance with standard industry practice (USACE 2026).

2.4 Selected Alternative

The selected alternative for the project is Alternative 3 – Excavation with Offsite Disposal. Field operations will likely include:

Mobilization: Equipment will be transported to Unalga Island by barge or landing craft and offloaded onto the beach at Malga Bay (see Figures 1 and 2). Shipping containers, loader, excavator, and other materials and equipment will be staged near the beach, similar to previous efforts. The contractor is likely to camp in the location used in previous site work, though operations could also be based from a vessel in Malga Bay.

Area 1 Field Work: An excavator will be used to dig test pits and excavate soil. Test pits will be advanced to assist delineation of soil contamination and guide excavation extents. Up to 1,000 tons of soil will be removed for offsite disposal, with an option to excavate an additional 1,000 tons as needed. The excavation will extend to the layer of cobbles observed in previous removal actions at approximately 2 to 6 feet below ground surface. Contaminated soil is assumed to extend beneath the road that runs from the beach to the likely camp and Areas 2 and 3; the contractor will need to reestablish access to camp and Areas 2 and 3 via a newly cut temporary road. The excavations will be graded to promote drainage, but not backfilled or seeded.

Up to six temporary groundwater monitoring wells, with an option for an additional five monitoring wells as needed, will be installed, developed, and sampled. The wells will be decommissioned after samples are collected, in accordance with ADEC guidance.

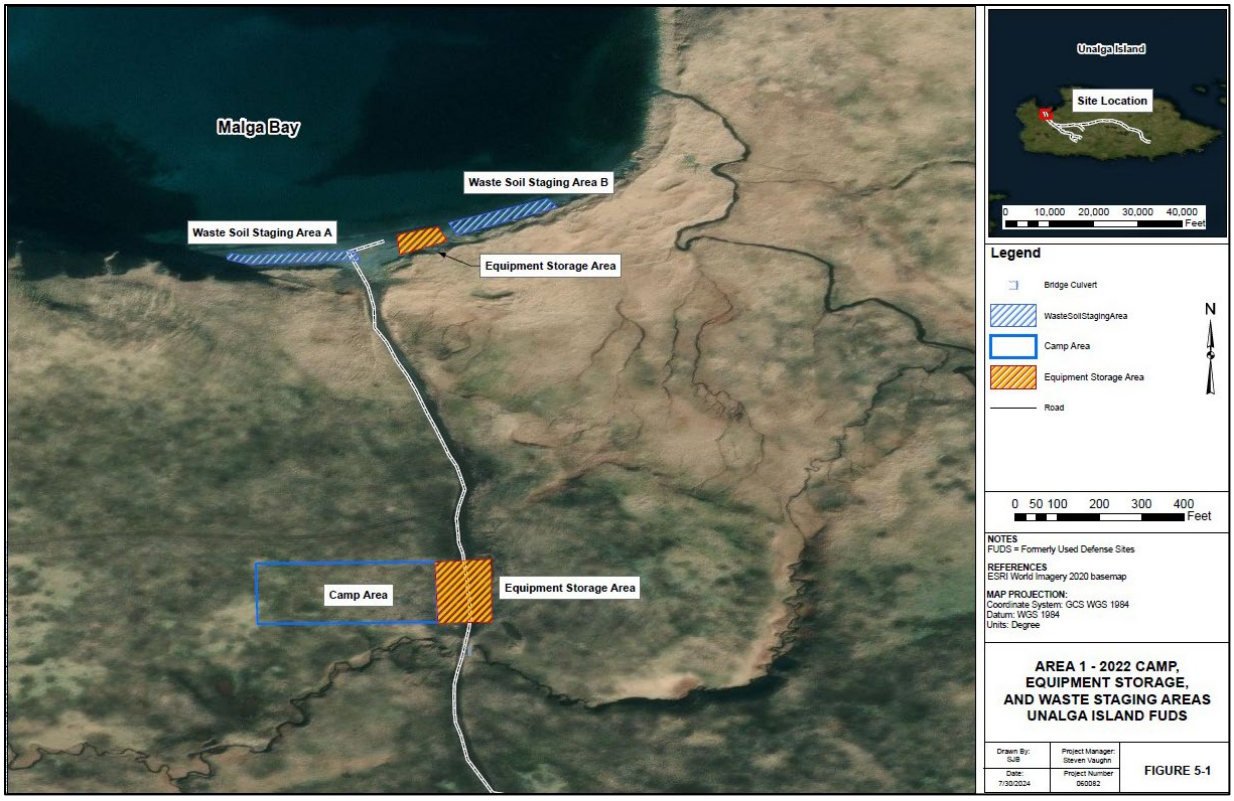

Figure 2. Malga Bay Camp and Staging Areas (USACE 2024).

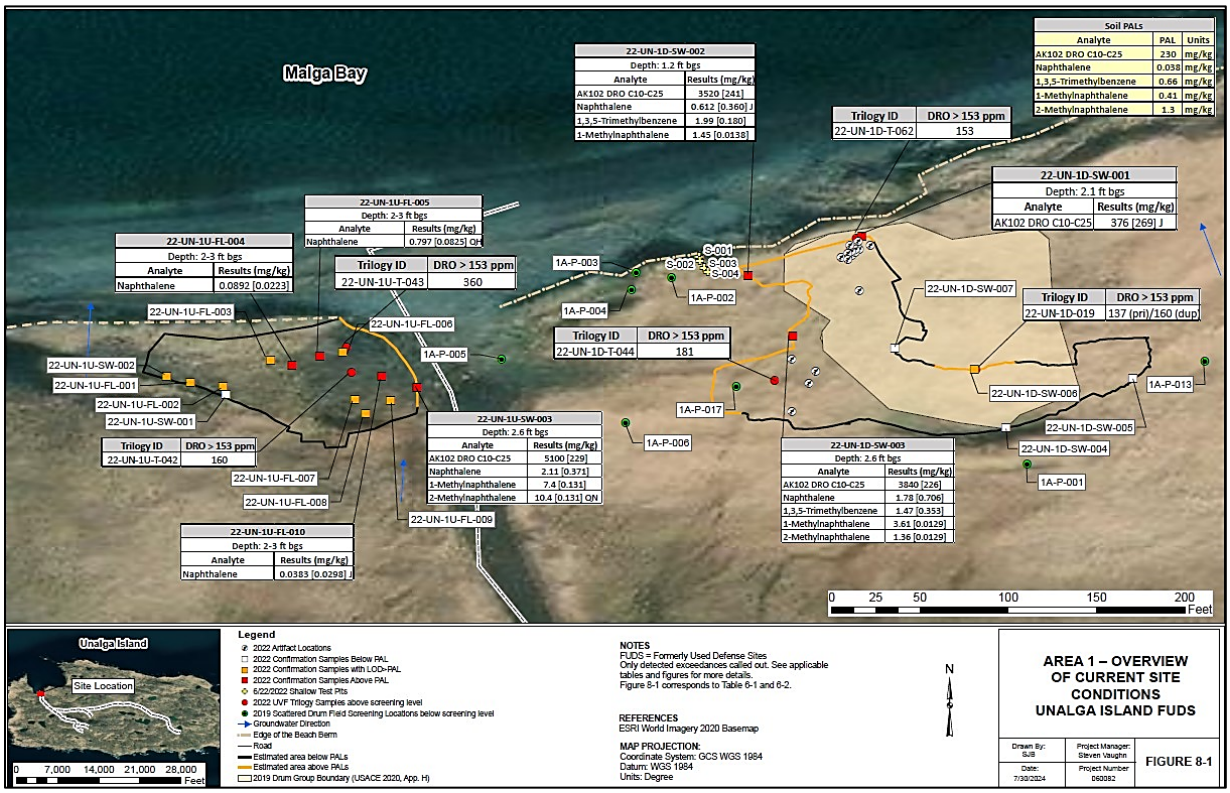

Figure 3. Area 1 2022 Sampling Locations and Results (USACE 2024).

Area 2 Field Work: As a result of previously reported petroleum sheen in a creek (Figures 4 and 5), the contractor will advance four soil borings by hand near the former Pump Station concrete foundation to investigate the area for the presence of petroleum-contaminated soil. If petroleum contamination is found, they will excavate and containerize up to 200 tons of soil to be disposed of off-island. Surface water and sediment samples will be collected from the creek, and paint-chip samples will be collected from the former communications building on top of Mountain 707 to confirm if previously observed lead contamination in soil at the communications building is due to flaking lead-based paint from the collapsed walls.

Demobilization: All equipment and materials, including camp wastes, will be removed from Unalga Island at the end of the project. Containerized environmental media will be loaded on the transport vessel for proper disposal off-island.

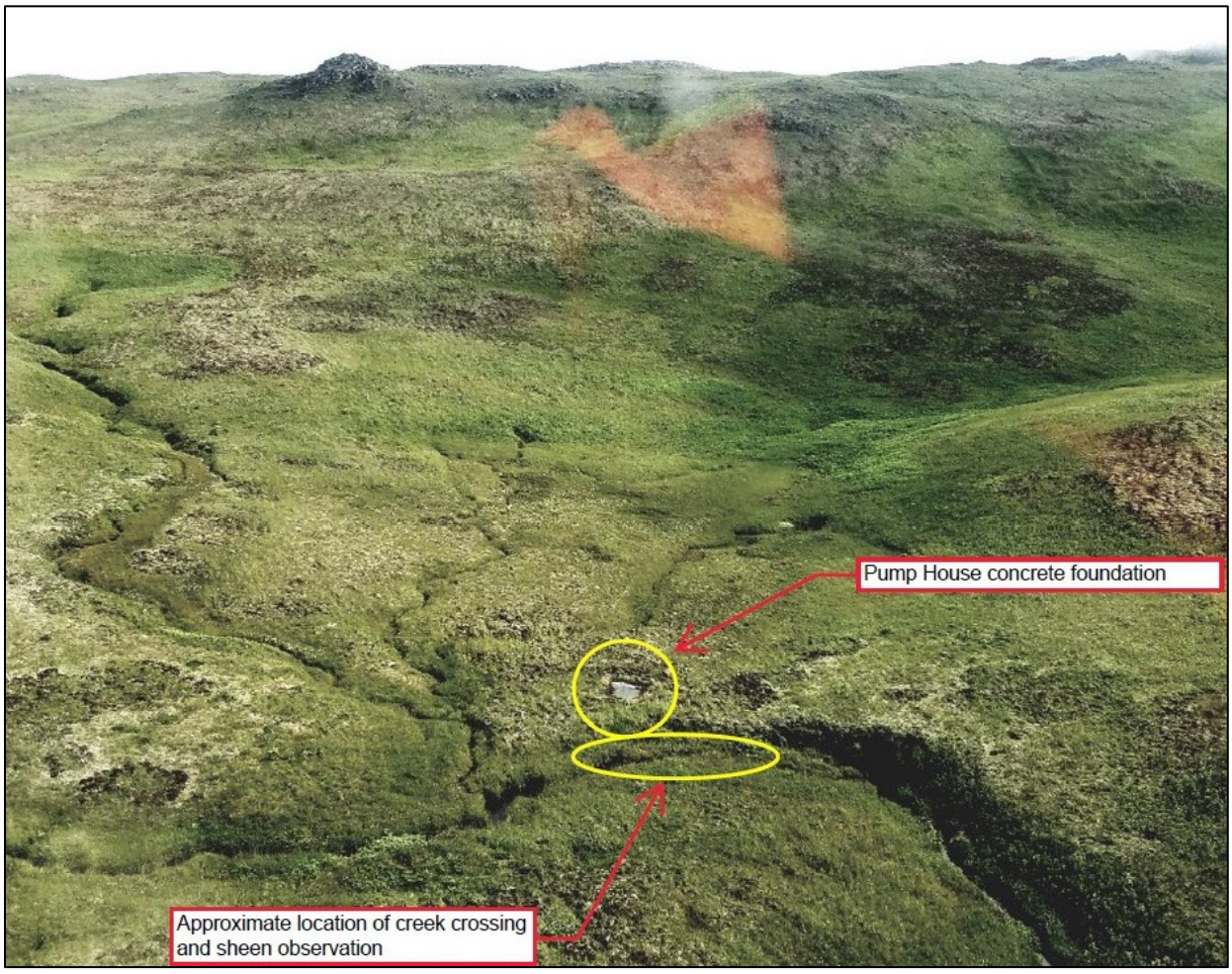

Figure 4. Area 2 Pump House foundation vicinity (USACE 2024).

Figure 5. Detail of Pump House creek site (USACE 2024).

2.5 General Work Practices and Environmental Protection

The contractor's work plan will include a comprehensive Environmental Protection Plan (EPP), which will detail steps that will be followed to avoid and minimize impacts to the environment. These include:

- 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 (e.g., grasses and ground cover, landscape features, air and water quality, fish and wildlife, soil, tundra, 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.

- Plans showing the proposed activity in each portion of the work area and identifying the areas of limited use or nonuse. Plans 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.

- Methods of protecting surface water and groundwater during construction activities, including spring breakup runoff management.

- Methods to preserve the current historical and archaeological setting to the extent practical.

- Daily inspections of vehicles, fuel containers, and other potential contaminant sources for leaks, and maintenance of spill-response equipment and materials in accordance with the project Accident Prevention Plan (APP).

- Watching for and avoiding marine mammals during operations of project support vessels.

- Watching for possible ground-nesting birds near the camp and work sites and following EPP procedures to protect any nests discovered.

- Implementing rat prevention and control measures to avoid transporting rats into the project area.

The contractor shall prepare a Waste Management Plan detailing the manner in which wastes will be managed both onsite and offsite. As appropriate and as applicable, this plan shall include any wastewater generated, pumped, or collected as part of any field activities. The plan shall propose facilities to be used for treatment, storage, and/or disposal; shall identify whether transfer facilities are to be used; and how the wastes will be tracked to ultimate disposal.

If the contractor can complete work without triggering the requirements of an Alaska Pollution Discharge Elimination System (APDES) permit then no APDES permit and Storm Water Pollution Prevention Plan (SWPPP) will be required. However, if the contractor plans to engage in grubbing, grading, and excavating activities that disturb one (1) acre of soil or more at the project site, they shall be required to obtain coverage under an APDES permit for their storm water discharges, submit a SWPPP, and maintain a Certified Erosion and Sediment Control Lead (CESCL) onsite.

To reduce the amount of material that needs to be transported to this remote location, and minimize the risk of importing invasive species, excavated areas will not be backfilled. However, the final excavated area will be graded to promote positive drainage, reduce ponding and entrapment hazards to wildlife, and match the existing topography to the extent practicable. No seeding or fertilizing will be required. Best management practices will be used to control erosion at the site.

The contractor shall develop a plan for site access to include both general site access (access to the entire project area), and site access to individual site features being addressed under the removal action. The contractor shall ensure that there is sufficient detail within this plan to document how site access will be achieved, to include techniques and equipment, protection of ground surfaces and landscape, and what site modifications will be done. In addition, the contractor shall identify access locations within the potential work areas and detail how those areas will be marked and protected in the field. The use of low ground pressure equipment is preferential due to poor quality of the existing access.

Cultural artifacts are likely to be encountered during excavation at Area 1. An archaeologist will be on site to monitor mobilization, excavation, road construction, and demobilization.

3.0 AFFECTED ENVIRONMENT

3.1 Community

Unalga Island is currently uninhabited. The nearest communities are Unalaska/Dutch Harbor, roughly 15 miles to the southwest on Unalaska Island, and Akutan, about 16 miles to the northeast on Akutan Island.

3.2 Current Land Use

The Alaska National Interest Lands Conservation Act of 1980 included Unalga Island in the newly established Aleutian Islands Unit of the Alaska Maritime National Wildlife Refuge (AMNWR). This act granted jurisdiction and management of the Island to the USFWS, with some property patents being owned by the Akutan Corporation. Although the entire island is part of AMNWR, which is administered by the USFWS, it is not designated Wilderness. The AMNWR was established to conserve marine mammals, seabirds, and other migratory birds, in addition to the marine resources upon which they rely. Recreational activities (e.g., hunting and fishing, wildlife observation, and photography) and environmental education and interpretation are permitted, as appropriate, on refuges (USACE 2024).

3.3 Climate

The northern maritime climate of the Aleutian Islands is characterized by fast-moving weather systems and is known for wind, rain, fog, overcast skies, and cool temperatures. Summertime temperatures range from 43 degrees Fahrenheit (°F) to 53°F, while winter temperatures average 31°F to 36°F. Fall and Spring temperatures range from 30.7°F to 47°F and 42°F to 50°F, respectively. Wind speeds average 9.1 to 16.5 miles per hour (mph). Snow cover is present at various times between October and May, with the highest amount of snowfall occurring during January (USACE 2024).

3.4 Topography, Soils, and Hydrology

The geology of Unalga Island is assumed to be predominantly volcanic. The gently rolling, treeless terrain of Unalga and the nearby Baby Islands contrast with the sharp mountain ridges and incised valleys of Unalaska and Adak Islands. Site visitors have observed that the soil consisted of a gravelly silt across much of the island, just below the vegetative layer. During the 2022 field investigation, site geology at the Area 1 excavation consisted of a vegetated soil cover containing rounded cobbles of 2 to 3 inches thickness overlying angular cobbles greater than 2 inches; bedrock was encountered at Areas 2 and 3 at shallow depths of 2 to 3 feet bgs. (USACE 2024).

The island receives approximately 60 inches of precipitation annually. Surface water on the island includes lakes, ponds, wetlands, streams, and seasonal drainages. Stream drainage systems are often short and steep due to topographic gradients. Available groundwater is generally limited to low-lying, relatively flat areas where alluvial deposits may contain water. During the 2022 field investigation, groundwater was encountered in the Area 1 excavation approximately 8 feet bgs; no groundwater was encountered at Areas 2 or 3 (USACE 2024).

3.5 Air Quality and Noise

The remote and uninhabited Unalga Island presumably enjoys excellent air quality because of the absence of pollutant emission sources and of persistent winds from the adjacent ocean. Ships, boats, small aircraft, and ground vehicles occasionally operating at the island would be the only emission sources, along with generators and stoves for temporary camps. Large volcanic eruptions along the Aleutian Islands may conceivably influence air quality on Unalga Island. There is no established ambient air quality monitoring program at Unalga Island, however, and little existing data to compare with the National Ambient Air Quality Standards (NAAQS) established under the Clean Air Act (CAA). These air quality standards include concentration limits on the “criteria pollutants” carbon monoxide, ozone, sulfur dioxide, nitrogen oxides, lead, and particulate matter. The island 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.

No specific noise data exist for Unalga Island, but man-made background noise would consist solely of that generated by passing ship, boat, and aircraft traffic.

3.6 Habitat and Wildlife

The terrestrial habitat is devoid of trees but is covered with endemic Aleutian grasses, forbs, and shrubs (Figure 6). Vegetation at the higher elevations and exposed areas consist of dwarf shrubs dominated by willows and crowberry plants. At lower elevations and more protected areas, herbaceous meadows dominated by bluejoint and a variety of other herbs are found. Grasses dominate in the coastal areas and low scrub bogs are dominated by sedges, mosses, and a variety of heath plants. Vegetative growth is prolific during the mild summer months, allowing tundra plants in sheltered areas to reach 6 inches height. Degradation of the vegetation is often slow in the cool temperatures, resulting in a buildup of duff and peat (USACE 2024).

Ground-nesting sea birds such as common eider and glaucous-winged gull reportedly use the vegetated interior of Unalga Island, while cormorants, murres, auklets, and puffins nest on the rocky bluffs along the east, south, and west margins of the island. The Baby Islands immediately northeast of Unalga Island host even greater numbers of nesting seabirds (Seabirds.net 2026). Other resident birds may include fox sparrows, ravens, and bald eagles.

No indigenous or introduced mammal species are known to be present. Introduced foxes were eradicated from Unalga Island by 2018; invasive rats are not currently reported to be present on the island. Marine mammals found in coastal waters include Steller sea lion, northern sea otters, northern fur seal, harbor and spotted seal, and a variety of whale, porpoise, and dolphin species (USACE 2024).

Figure 6. View of the Unalga Island interior terrain and vegetation around Area 2 (2017).

3.7 Protected Species

Endangered Species Act. Table 1 below summarizes the species protected under the Endangered Species Act (ESA), under the jurisdiction of either the National Marine Fisheries Service (NMFS) or the USFWS that are identified as potentially being in the marine waters surrounding Unalga Island. This list was created using NMFS and USFWS on-line resources (NMFS 2025; USFWS 2025) and from informal consultation conducted recently for multiple Aleutian Island sites (NMFS 2017; USFWS 2015).

Figure 7, provided by the NMFS (NMFS 2017), shows known Steller sea lion use areas at Priest Rock and Brundage Point on eastern Unalaska Island, and in the Baby Islands immediately east of Unalga Island. The nearest designated critical habitat area for Steller sea lions is the Cape Morgan rookery on western Akutan Island, roughly 6 miles straight-line-distance from the Malga Bay landing site on Unalga Island. The marine waters surrounding Unalga Island are presumably used by Steller sea lions mainly as a foraging area. Steller sea lions in the Aleutian Islands feed primarily on Atka mackerel, rockfish, sand lance, octopus, and other species available year-round, but will adjust their foraging patterns to exploit locally and seasonally abundant species such as salmon and cod (NMFS 2008).

Table 1. ESA Species Potentially Present in the Project Area.

Species	Population	Status	Agency Jurisdiction
Steller sea lion, *Eumetopias jubatus*	Western DPS	Endangered	NMFS
Humpback whale, *Megaptera novaeangliae*	W. Pacific DPS	Endangered	NMFS
	Mexico DPS	Threatened	NMFS
N. Pacific right whale, *Eubalaena japonica*	All	Endangered	NMFS
Sperm whale, *Physeter macrocephalus*	All	Endangered	NMFS
Fin whale, *Balaenoptera physalus*	All	Endangered	NMFS
Blue Whale, *Balaenoptera musculus*	All	Endangered	NMFS
Western No. Pacific Gray Whale, *Eschrichtius robustus*	All	Endangered	NMFS
Northern sea otter, *Enhydra lutris kenyoni*	S.W. Alaska DPS	Threatened	USFWS
Steller's eider, *Polysticta stelleri*	All	Threatened	USFWS
Short tailed albatross, *Phoebastria albatrus*	All	Endangered	USFWS

DPS: Distinct Population Segment

Humpback, sperm, fin, blue, Western North Pacific gray, and Northern Pacific right whales are far-ranging species and would be encountered only incidentally by the project vessels. Of these species, only the Northern Pacific right whale has designated critical habitat in the form of two large off-shore areas of the Bering Sea and Gulf of Alaska designated in 78 FR 19000, roughly 500 miles to the east of Unalga Island. Recent guidance from the NMFS on humpback whales discusses the three distinct population segments (DPS) of humpback whales that occur in Alaskan waters: the Western North Pacific DPS (an endangered species under the ESA), the Mexico DPS (a threatened species), and the Hawaii DPS (not listed under the ESA). Whales from these three DPSs overlap to some extent on feeding grounds off Alaska. An individual humpback whale encountered in Aleutian waters has an 86.5 percent probability from being from the unlisted Hawaii DPS, an 11.1 percent chance of being from the threatened Mexico DPS, and a 4.4 percent chance of being from the endangered Western North Pacific DPS (NMFS 2016).

Northern sea otter critical habitat designated by the USFWS includes coastal waters surrounding Unalga Island. The 2009 critical habitat final rule (74 FR 51988 52012) identified four primary constituent elements (PCEs) for sea otter habitat:

1. Shallow, rocky areas where marine predators are less likely to forage, which are waters less than 2 meters (6.6 ft) in depth.
2. Near-shore waters that may provide protection or escape from marine predators, which are those within 100 meters (328.1 ft) from the mean high tide line.
3. Kelp forests that provide protection from marine predators, which occur in waters less than 20 meters (65.6 ft) in depth.

4. Prey resources within the areas identified by PCEs 1, 2, and 3 that are present in sufficient quantity and quality to support the energetic requirements of the species.

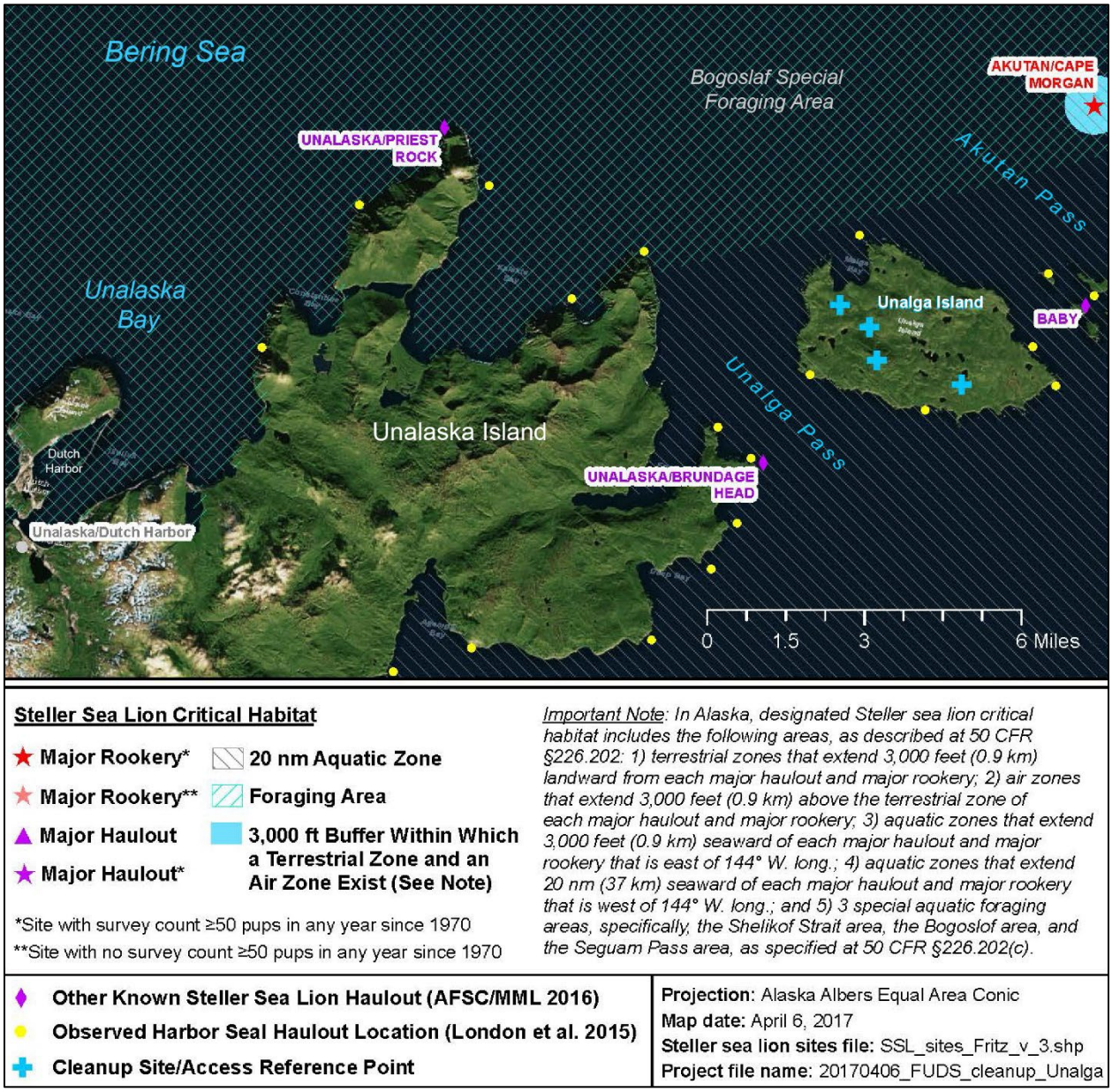

Figure 7. Steller sea lion critical habitat and other use areas at Unalga Island and vicinity (adapted from NMFS 2017).

Short-tailed albatrosses breed on several small islands off the coast of Japan, but range across much of the North Pacific Ocean as adults and sub-adults. In the marine environment, the species tends to concentrate in regions along the break of the continental shelf, where upwelling and high primary productivity result in zones of abundant food resources, namely squid and pelagic fishes. The short-tailed albatross may be found in near-shore waters but commonly only where such upwellings occur near the coast. No critical habitat is currently designated for this species.

Steller's eiders may winter in coastal waters surrounding Unalga Island, but nest in northeastern Siberia and limited areas of mainland Alaska, and would not be present at Unalga Island during the spring-summer project activities.

Marine Mammal Protection Act. The Marine Mammal Protection Act (MMPA) provides protection for all whales, dolphins, porpoises, seals, sea lions, and sea otters, regardless of a species' listing under the ESA. The NMFS ESA/MMPA mapper website (NMFS 2025) identifies harbor seal, northern fur seal, ribbon seal, Dall's porpoise, harbor porpoise, killer whale, Minke whale, Pacific white-sided dolphin, Baird's beaked whale, and Stejneger's beaked whales as non-ESA marine mammals that potentially may be found offshore Unalga Island.

Bald and Golden Eagle Protection Act. This Act prohibits takings such as killing eagles or destroying nests, as well as regulates human activity or construction that may interfere with eagles' normal breeding, feeding, or sheltering habits (USFWS 2007). Bald eagles are present throughout the eastern Aleutian Islands; in the absence of trees, bald eagles in the Aleutians typically nest at the tops of sea-stacks or cliffs (Byrd & Williams 2008). Rocky cliffs form portions of the Unalga Island coast.

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 Migratory Bird Treaty Act (MBTA; USFWS 2009).

3.7 Wetlands

Figure 8 shows wetlands identified by the USFWS on their National Wetlands Inventory website (USFWS 2026). The USFWS evaluation displays wetlands on Unalga Island as discontinuous patches confined to drainage pathways connected with ponds and lakes. The project sites on Unalga Island have not been delineated for Clean Water Act Section 404 wetlands as regulated by USACE.

3.8 Anadromous Streams and Essential Fish Habitat

The Alaska Department of Fish and Game (ADFG) has not identified any waterbodies on Unalga Island as anadromous or fish-bearing in their Anadromous Waters Catalog (AWC; ADFG 2025). The marine waters surrounding the island are part of NMFS-designated essential fish habit (EFH) for ocean-run salmon, Bering Sea-Aleutian Island groundfish and crab, and scallops (NMFS 2026).

3.9 Cultural and Historic Resources

The planned cleanup activities have been evaluated by USACE archaeologists and coordinated with the Alaska State Historic Preservation Office (SHPO) under Section 106 of the National Historic Preservation Act (NHPA). According to the Alaska Heritage Resources Survey (AHRS) database, there are three known cultural resources within the project's area of potential effect (APE): the WWII Landing Area and Road System (AHRS No. UNL-00607), the WWII Racon Station (UNL-00608), and the site of subsurface artifacts discovered during USACE environmental cleanup actions in 2022 (UNL-00636). These resources are categorized as sites; two have been evaluated for listing in the National Register of Historic Places (NRHP) and one was assumed to be eligible for listing in the NRHP in accordance with 36 CFR § 800.13(c) (USACE 2025).

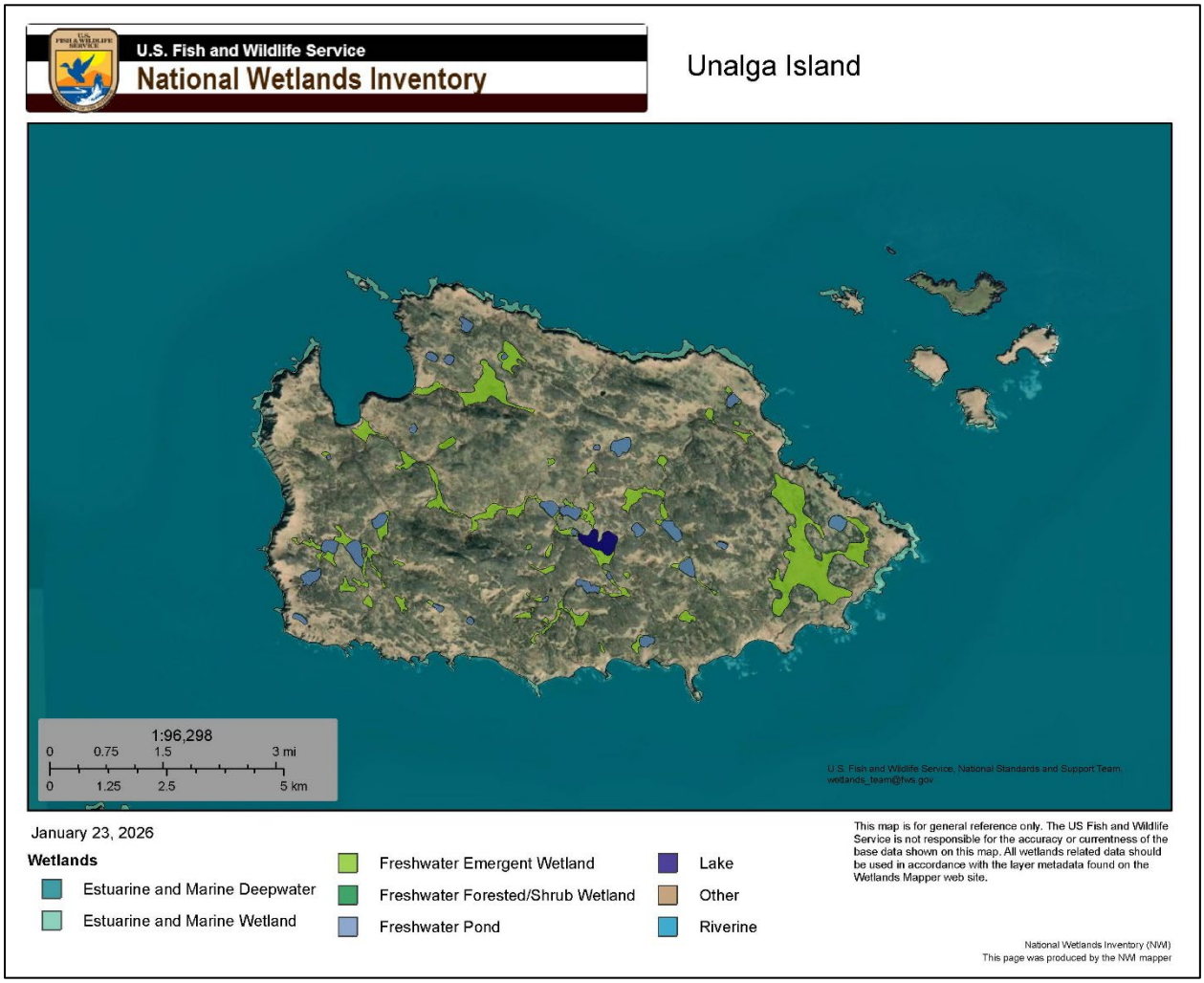

Figure 8. USFWS inventory of wetlands on Unalga Island (USFWS 2026).

The WWII Landing Area and Road System (UNL-00607) on Unalga Island starts at Malga Bay, which was the sole landing area used by the military during World War II. The site crosses both Akutan Corporation and USFWS Refuge lands. Construction on the landing area and associated dirt roads began in September or October of 1942. Multiple paths were created during the war due to vehicles and equipment becoming stuck in muskeg or breaking through the road into subterranean streams. As of 2017, multiple modern all-terrain vehicle trails cover the island, creating trails that are difficult to differentiate from historical trails. In 2018, USACE determined that UNL-00607 was not eligible for listing in the NRHP, and the SHPO concurred that the site “is not individually eligible for the National Register of Historic Places” (USACE 2025).

The WWII Racon Station (UNL-00608) is primarily situated on top of Mountain 707. It is located on Akutan Corporation and USFWS Refuge lands. Site features off the mountain include the remnants of a small water pump house near a creek at the northern base of the mountain. During the war, water was pumped from the creek approximately 500 feet up to a 1,000 gallon above-ground storage tank (AST) near the communications building. In 2018, USACE

determined that UNL-00608 was eligible for listing in the NRHP, with the concurrence of the SHPO (USACE 2025).

The UNL-00636 subsurface archaeological site was discovered during the removal of contaminated soil at Malga Bay in 2022. Its current known extent is located on USFWS land. Due to the thick layer of large beach cobbles underlying the area, it was not feasible to identify the extent and boundaries of the site through shovel-testing, and the extensive scattered metal debris from the 55-gallon drum dump precluded the use of ground-penetrating radar or other geophysical measures to identify the site's extent. A total of 31 stone artifacts were identified and collected from the site in 2022. No other artifacts or features were noted at that time. After consultation with USFWS, SHPO, and other stakeholders in accordance with 36 CFR § 800.13(c), USACE assumed that UNL-00636 was eligible for listing in the NRHP (USACE 2025).

4.0 ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVES

4.1 No-Action and Land Use Controls Alternatives

The no-action alternative (Alternative 1) and the land use control alternative (Alternative 2) 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 would remain in place, where it will continue to present a physical hazard and potentially allow the migration of chemical contaminants to the nearby environment. Alternative 2 would limit the potential of human exposure to the contamination at its source.

4.2 Selected Alternative

Under the selected Alternative 3, Excavation with Offsite Disposal, contaminated soils would be removed from the project areas to the extent practicable. The potential environmental consequences are described below.

4.2.1 Effects on Community and Land Use

The project site and surrounding areas of Unalga Island are uninhabited and are expected to stay that way for the foreseeable future. The proposed activities will neither encourage nor inhibit future development on Unalga Island. The project is being closely coordinated with the Refuge, the Akutan Corporation, and other stakeholders.

4.2.2 Effects on Topography, Soils, and Hydrology

The limited areas of excavation will not significantly alter the area topography or patterns of overland water flow in the area. Since the excavations will not be backfilled, but only contoured to blend with the surrounding land to avoid entrapment hazards, highly localized changes in topography and hydrology may remain after the project is completed, such as shallow depressions that may become small ponds.

4.2.3 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. The USACE assesses that 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 CAA "non-attainment" area, and the conformity determination requirements of the CAA would not apply to the proposed project at this time.

The project areas are not near any residences. The noise generated by project activities will be comparable to low-level construction noise and should not disrupt human activity.

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. The activities would have little effect on local wildlife and no long-term negative impact on their habitat. 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.

Ground-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 MBTA.

4.2.5 Effects on Protected Species

The principal threats to marine mammals in general consist of:

- Ship strikes
- Direct impacts from human fishing (e.g., entanglement in fishing gear)
- Indirect impacts from human fishing (e.g., competition for food resources)
- Contaminants and pollutants
- Habitat degradation caused by human activities and disturbance
- Hunting and predation (pertaining mostly to Steller sea lions)

The project's main potential adverse effect on marine mammals would be ship strikes as project support vessels travel to and from Unalga Island, and as equipment, material, and personnel are lightered between vessels and the shore. While ship strikes on whales are an issue of increasing concern (Neilson et al. 2012; Jensen & Silber 2003), the relatively low speed of an ocean-going barge or landing craft, together with a barge's blunt prow and shallow draft, make it far less likely to strike and inflict injury upon a whale than larger, faster ocean-going vessels such as cruise ships and cargo ships.

To minimize the potential effects of vessel movement on protected marine mammals, the USACE proposes:

- Project support vessels will be limited to a speed of 8 knots, or the slowest speed above 8 knots consistent with safe navigation, when within the confines of Malga Bay or within 3 nautical miles of any of the Steller sea lion haulouts described above to reduce the risk of collisions with protected species. The project vessels are not expected to approach any Steller sea lion rookeries.

Small, maneuverable watercraft such as skiffs have a greater risk of harming or disturbing sea otters and other small marine mammals than large, slow-moving vessels. If skiffs are used during the Unalga Island project, USACE will require its contractors to adopt USFWS guidance for

Leaks and releases of fuel and other chemical products from the project support vessels also have the potential to cause adverse effects. The USACE will be removing potentially harmful materials from Unalga Island, including petroleum products. These materials will be sealed into impermeable polymer “Supersacks” before being transported from the island and carefully secured aboard the barge for transportation to proper disposal facilities. The USACE has conducted the transfer of containerized waste material from shore to transport vessels at numerous cleanup sites without incident, and considers the risk of a release of these materials into the marine environment to be very low.

With the avoidance and minimization steps outlined above, the USACE determines that the project activities may affect, but are not likely to adversely affect the following ESA-listed species or any designated critical habitat:

- Steller sea lions (Western DPS)
- Humpback whales (Western Pacific and Mexico DPSs)
- North Pacific right whales
- Western North Pacific gray whales
- Fin whales
- Blue whales
- Sperm whales
- Northern sea otter (Southwest Alaska DPS).

The USACE assesses the probability of the project support vessels encountering, let alone affecting, the rare and widely-dispersed short-tailed albatross to be very low. Steller’s eiders are not expected to be in the Unalga Island vicinity during the summer nesting and molting seasons. The USACE determines that the project activities will have no effect on short-tailed albatross or Steller’s eider.

The USACE coordinated with the NMFS for the previous cleanup event at Unalga Island, arriving at these same determinations under the ESA; the NMFS concurred in a letter dated 8 May 2019 (NMFS 2019). The USACE contacted the NMFS in 2025 asking if they wished to re-open ESA consultation for the proposed 2027 cleanup on Unalga. The NMFS stated in an email dated 18 December 2025 that renewed consultation for the continued cleanup activities would not be necessary.

Similarly, the USACE coordinated with the USFWS for the previous cleanup event, making a determination of may-affect-but-not-adversely-affect for northern sea otters. The USFWS concurred in a letter dated 15 May 2017 (USFWS 2017). The USACE contacted the USFWS on 6 January 2026 asking if they wished to re-open ESA consultation for the planned 2027 cleanup. The USFWS responded on 7 January 2026 that they recommended a new informal consultation. In the absence of further instructions from the USFWS, the USACE submitted a new ESA determination letter for Unalga Island dated 26 January 2026. The USFWS responded

in an email dated 5 February 2026 that included a list of ecological best management practices (BMPs); an ESA letter of concurrence is pending:

Table 2. USFWS Best Management Practices for Vessel and Aircraft Operations in Northern Sea Otter, Steller's Eider, and Short-tailed Albatross Habitat

General Measures

- Take all precautions necessary to minimize spilling of fuels or other materials in the marine environment.
- To fulfill Federal and State reporting requirements, all spills of oil/petroleum/other hazardous substances, of any size, should be reported to the National Response Center (1-800-424-8802) and the ADEC Spill Reporting Hotline (1-800-478-9300).
- Reporting: The Service should receive reports of any interactions with sea otters, Steller's eiders, or short-tailed albatross, as well as reports of injured-stranded species under our jurisdiction, even if the mechanism of injury is not project-related. Any injury or death of a protected species related to human activities must be reported as soon as possible and no later than 48 hours after occurrence.
    - For injured/stranded sea otters:
        - Alaska SeaLife Center Stranding Hotline (1-888-774-7325) *and*
        - FW7_MMM_Reports@fw.gov
    - For injured Steller's eiders or short-tailed albatross:
        - Alaska SeaLife Center Stranding Hotline (1-888-774-7325) *and*
        - ak_fisheries@fws.gov
    - All other migratory birds reports:
        - Alaska Sick and Dead Bird Hotline (1-866-527-3358) *or*
        - ak_mbm@fws.gov

Best Management Practices for Helicopter Operations

- Aircraft operators shall operate at 457 meters (1,500 feet) altitude when safe and practicable unless logistical requirements dictate otherwise. Drones that must operate at lower altitudes should maintain the highest altitude operationally possible.
- Except for take-offs and landings, aircraft operators shall transit at altitudes above 457 meters (1,500 feet) in coastal environments (within 457 horizontal meters [1,500 feet] inland or 1.6 kilometers [1 mile] seaward from the MHW coastline) and within bays and inlets less than 6 kilometers (3.7 miles) wide when safe and practicable.
- When taking off or landing in coastal environments (within 457 horizontal meters [1,500 feet] inland from MHW coastline), all passengers on an aircraft will observe for marine mammals. Take-offs and landings will only occur if no marine mammals are observed in the area.
- When taking off, landing, or hovering to secure or drop loads, aircraft operators shall maintain a 1,000 meter (3,281 feet) horizontal distance from sea otters.

Best Management Practices for Vessel Operations

- Be vigilant for sea otters and birds on the water and low-flying birds when vessels of any size are underway. Deploy/assign wildlife observers on large vessels. While operating skiffs in nearshore areas, place a person in the bow to help the operator search.
- When you see one or more otters or one or more suspected or confirmed Steller's eiders or short-tailed albatross (hereafter, "protected species"), alter your course and slow down to avoid disturbance and collision. Where protected species are present, recommended vessel speeds are 10 knots or less.
- Pass protected species in parallel. Never deliberately operate a vessel at any rate of speed heading directly toward a protected species.
- For smaller vessels (<24 meters, <80 feet), maintain a minimum distance of 100 meters (328 feet) from single sea otters, 200 meters (656 feet) from female-pup sea otter pairs and 500

- meters (1,640 feet) from rafts of sea otters (groups of 10 sea otters or more) when safe and practicable. These distances also apply to eiders and short-tailed albatross.
- For larger vessels (>24 meters, >80 feet), vessels will maintain a minimum distance of 300 meters (984 feet) from sea otters and eiders when safe and practicable.
- If vessel operators observe sea otters or eiders consistently flushing/diving in response to the vessel transiting at the minimum distance, then the vessel operator shall increase the minimum distance until sea otters and eiders are no longer flushing/diving in response to the vessel.
- Travel using established navigation channels or commonly recognized vessel traffic corridors. Avoid operating in or near kelp beds and avoid alongshore travel in shallow water (less than 20 meters) whenever practicable.
- Vessels shall maintain maximum distance practicable from areas of surface kelp and from areas of eelgrass. When these areas cannot be avoided, practice extra vigilance and minimize activities in these areas.
- If marine mammals or suspected or confirmed Steller's eiders approach a vessel, place engines in neutral and allow them to pass.

The USACE determines that the project activities are unlikely to result in the taking of an animal protected under the MMPA.

Nesting eagles are not expected at the project site, especially not in the treeless interior of Unalga, although eagles may be present at Malga Bay. A few transient adult bald eagles may be seen from the project area, but the USACE anticipates a very low risk of a taking under the Bald and Golden Eagle Protection Act.

Nesting birds are likely to be the most vulnerable terrestrial animal species at the site. The destruction of active nests, eggs, or nestlings is a violation of the MBTA. The USFWS advises that the period 1 May through 15 July should be considered the nesting window for birds nesting in shrub or open habitat in the Aleutian Islands (USFWS 2017). The project activities may overlap this nesting window; however, the activities will be focused in limited areas, . The contractors will be instructed to watch for signs of ground-nesting birds and avoiding any egg- or chick-bearing nests if identified, but the USACE considers the risk of a taking under the MBTA to be low.

4.2.6 Effects on Wetlands

The project sites have not been delineated for wetlands as defined by the USACE under Section 404 of the Clean Water Act. Where native soils are removed in the course of removing contamination and debris, wetlands may incidentally be impacted. However, no backfilling of excavations or creation of new pads or roads is planned, so no discharge to wetlands under Section 404 of the Clean Water Act will occur. The wetlands affected by project activities will be those already heavily impacted by chemical contamination and debris; the removal action will protect and improve the surrounding wetland habitat by removing contamination and physical obstructions and hazards.

4.2.7 Effects on Anadromous Streams and Essential Fish Habitat

The project will require crossing a stream with heavy equipment and excavating contaminated soil at the edge of the stream. Best management practices such as silt fencing or other appropriate sediment control would be employed to minimize the risk of runoff reaching streams

during excavation. The intent of the project is to remove sources of contamination from the environment, which should have a net positive effect on local fish habitat.

The project will not adversely affect EFH. The only project activity occurring in the local marine environment is the landing of transport barges or landing craft, which will have a negligible impact on EFH. The pre-packaging of waste materials on shore will minimize the risk of discharging contaminants into the marine environment, and the contractor's Spill Prevention Plan will address potential releases of fuel or other chemicals from the project support vessels.

4.2.8 Effects on Cultural Resources

The proposed undertaking has the potential to affect three known cultural resources: Unalga Island WWII Landing Area at Malga Bay and Road System (UNL-00607), the Unalga Island WWII Racon Station (UNL-00608), and the subsurface archaeological site discovered in 2022 (UNL-00636). UNL-00607 is not eligible for listing in the NRHP. The tasks proposed in Area 2 will not alter or diminish any characteristics or features of UNL-00608. However, the tasks proposed in Area 1 may damage or destroy part or all of UNL-00636 (USACE 2025).

The USACE found that the proposed undertaking will result in an adverse effect on UNL-00636, and proposed to resolve this adverse effect through the development of a Programmatic Agreement between the USACE, the SHPO, and the landowners, and other stakeholders, in accordance with 36 CFR § 800.14(b)(1)(ii). The SHPO concurred that UNL-00608 would not be affected by the undertaking and concurred that there will be an adverse effect on UNL-00636 (SHPO 2025). A Programmatic Agreement among stakeholders to resolve the adverse effect is in the process of being developed.

4.2.9 Effects on Coastal Zone Management

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 continuing project would require no resource permits and few authorizations. The USACE has been closely coordinating its proposed activities with the USFWS AMNWR. The USFWS and the NMFS will receive copies of this EA for review; ESA coordination with those agencies will be renewed as necessary when more specific details on the proposed activities are available from the USACE contractor.

6.0 CONCLUSION

The continued environmental cleanup efforts at Unalga Island, 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 USACE FUDS Project Manager is Kelly Baltz.

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