

# Environmental Resources Section Public Notice

Alaska District U.S. Army Corps of Engineers Date <u>29 Oct 2018</u> Identification No.<u>ER-19-001</u> Please refer to the identification number when replying.

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

#### Removal Action Petroleum-Contaminated Soil and Debris CANOL Pipeline Pump Station "L" Formerly Used Defense Site (FUDS) - F10AK1033-00) Near Dot Lake, 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 means to clean up waste materials, contaminated soil, and unsafe structures and debris from areas formerly used by the DOD.

The proposed project and potential environmental impacts are described in the enclosed EA and draft FONSI, which is available for public review and comment for 15 days from the date of this notice. It may also be viewed on the Alaska District's website at: <u>www.poa.usace.army.mil</u>. Click on the Reports and Studies button, look under Documents Available for Public Review, and then click on the Environmental Cleanup link.

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

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

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

Sincerely,

Michael R. Salyer V Chief, Environmental Resources Section



US Army Corps of Engineers Alaska District

# Environmental Assessment and Finding of No Significant Impact

### Removal Action Petroleum-Contaminated Soil and Debris

## CANOL Pipeline (F10AK1033-00) Pump Station "L"

Formerly Used Defense Sites Program



October 2018

#### FINDING OF NO SIGNIFICANT IMPACT

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

#### Removal Action Petroleum-Contaminated Soil and Debris CANOL Pipeline Pump Station "L" Formerly Used Defense Site (FUDS) - F10AK1033-00) Near Dot Lake, 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 Corps action complies with the National Historic Preservation Act, the Endangered Species Act, the Clean Water Act, the Magnuson-Stevens Fishery Conservation and Management Act, and the National Environmental Policy Act. The Corps incorporates by reference the analyses performed for the issuance 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 proposed removal actions.

Philip J. Borders Colonel, U.S. Army Commanding Date

#### **Environmental Assessment**

#### **1.0 PURPOSE AND NEED OF REMEDIAL ACTION**

#### 1.1 Introduction

The U.S. Army Corps of Engineers (Corps) prepared this environmental assessment (EA) to address, under the National Environmental Policy Act (NEPA), the excavation of petroleumcontaminated soils and other ground-disturbing activities to be performed along the route of the former CANOL military fuel pipeline within 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 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 soils contaminated only with petroleum, which falls outside the purview of CERCLA.

#### 1.2 Site Description and History

The CANOL Pipeline was constructed during World War II to move fuel from Whitehorse, Canada to Fort Wainwright, Alaska. Construction of the pipeline began in 1942 and was completed in February 1944. The Whitehorse refinery, which supplied fuel to the pipeline, shut down in April 1945. Fuel pumped through the pipeline after the refinery was shut down was supplied via a pipeline from Skagway. The CANOL pipeline suspended operation in July 1946, when the Alaska portion of the CANOL Pipeline was turned over to the Alaska District Corps of Engineers pending a decision on the final disposition of the pipeline. After inspections, repairs, and testing were completed, the restored CANOL Pipeline was returned to service in May 1948. Use of the CANOL continued until 1955 when the Haines-Fairbanks pipeline went into operation. During operation, the CANOL pipeline was used to transfer aviation gasoline, motor gasoline, and diesel fuel oil (USACE 2018). The Pump Station "L" site and its access is currently on lands owned or managed by the Bureau of Land Management (BLM), AT&T Alascom, and the Alaska Department of Transportation and Public Facilities (ADOTPF).

The Pump Station "L" site is located roughly 3 miles west-northwest of the community of Dot Lake along the Alaska Highway; the pump station foundation is approximately 600 feet north of the highway, at the coordinates N63.6792, W144.1559 (figure 1). A 2016 site visit also found several wooden structures with concrete footers, and a small dump area with empty 55-gallon drums and other scattered debris (figures 2 and 3).

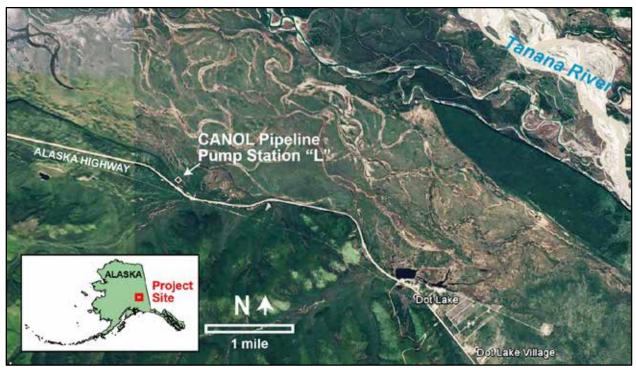


Figure 1. Location and vicinity of proposed project site.

#### 1.3 Need for Action

Signs of environmental contamination previously noted at the Pump Station "L" site, such as fuel odors and stressed vegetation, were confirmed by a site investigation performed in 2017 (FES 2018). That investigation found extensive fuel contamination of area soils, including diesel-range organics (DRO), and fuel-constituent compounds such as benzene, toluene, ethylbenzene, xylene (BTEX) and polycyclic aromatic hydrocarbons (PAH). The volume of fuel-impacted soil was estimated to be 1,200 cubic yards, while the depth of contamination in the area was confirmed down to at least 13 feet below ground surface (bgs). Contamination of soil in excess of the State of Alaska Department of Environmental Conservation (ADEC) migration-to -groundwater soil cleanup levels (ADEC 2018) has been confirmed in the vicinity of the stressed vegetation area (FES 2017, USACE 2018). Scattered empty 55-gallon drums, paint cans, piping, and other debris were also observed across the site.



Figure 2. Pump Station "L" site features (adapted from FES 2018).

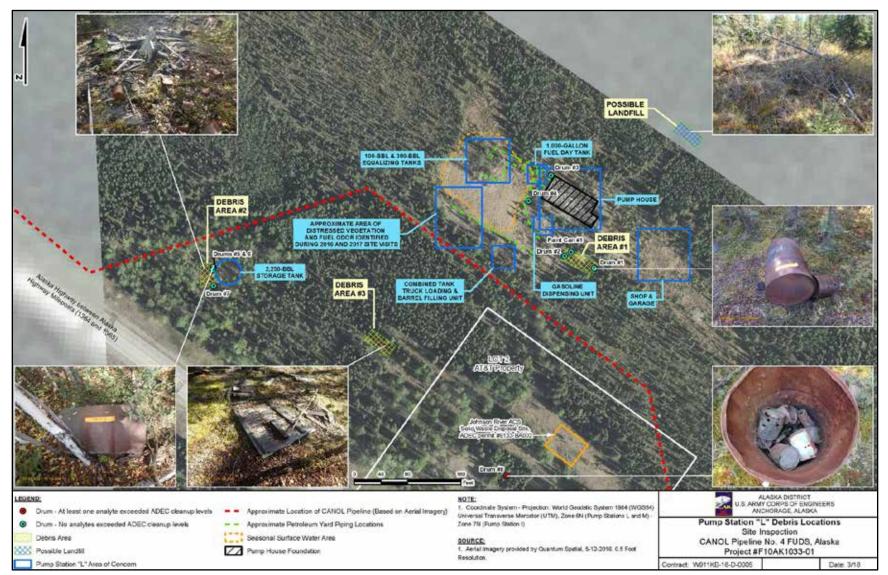


Figure 3. Location of debris on site (adapted from FES 2018).

#### **2.0 ALTERNATIVES**

#### 2.1 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, under the no-action alternative, the contaminated soil would remain in place. This would potentially allow the migration of chemical contaminants to nearby wetlands and subsistence areas and limit the use of the area by the community.

#### 2.2 Removal and Off-Site Remediation of Soil Alternative

Excavation of contaminated soil and transportation to an off-site soil reclamation center has typically been regarded by the Alaska District Corps as the surest and most economical means of reducing environmental contamination and reaching compliance with State soil cleanup regulations. The Corps has seldom pursued on-site treatment or passive remediation of contaminated soil at small, remote FUDS, finding that cold temperatures and the high costs of maintenance and monitoring make such alternatives impractical and uneconomical.

#### 2.3 On-Site Remediation of Soil Alternative

The Corps retains the alternative of on-site remediation of excavated petroleum-contaminated soil, for potential selection by the future contractor. Under this alternative, the contaminated soil would be treated in a landfarm, established at a site owned and approved by the Bureau of Land Management. The most likely location for such a landfarm is a previously disturbed area between Pump Station "L" and the Alaska Highway, defined by the red polygon shown on figure 4. This approximately 0.75-acre area is believed to be adequate for the base-contract quantity of 1,500 tons of contaminated soil, but might need to be enlarged if the quantity to be treated on-site is increased. The successfully remediated soil would be returned to the area from which it was excavated, as the landfarm is decommissioned.

#### 2.4 Preferred Alternative

The preferred alternative is excavation of petroleum-contaminated soil, followed either by offsite remediation and disposal, or on-site landfarming; the remedial method will be chosen upon award of the contract based on contractor proposals. The environmental consequences of both soil remedial alternatives will be discussed in Chapter 4.

The overall scope of activities under this alternative includes excavating and remediating up to 1,500 tons of petroleum-impacted soil (with an option for the contractor to remove an additional 1,500 tons of petroleum-impacted soil) as well as consolidating and properly disposing of up to 5 tons of non-hazardous debris from Pump Station "L".



Figure 4. Potential location for a landfarm.

# 2.5 Construction Considerations and Minimization of Environmental Impacts

The current scope (USACE 2018) for the proposed action discusses the following conditions and requirements relating to the environmental conditions at the site:

- The contractor shall be prepared to create temporary access road(s) and perform tree clearing to access contaminated soil and complete the excavation effort. The existing access road to the site may be cleared or widened only to the minimum extent necessary for vehicle and equipment access to the site.
- If any trees over 4 inches diameter are cut, they must be bucked to 8-foot lengths and stacked onsite or chipped and spread. All other cleared brush and smaller diameter trees shall be removed or chipped and spread.
- All non-contaminated topsoil excavated shall be segregated and stockpiled on site for use during site backfill and/or revegetation.
- Contaminated soil requiring excavation/disposal exists up to 15 feet bgs. Excavation through frozen soil will be required (active layer and/or permafrost). Frozen soil that is exposed for extended periods of time will melt, saturating the excavation and causing sidewalls to slough. The contractor shall be prepared to quickly and effectively minimize the melt of frozen soil and to address standing water that may develop within the excavation. Methods to address soil melt and standing water shall be presented in the contractor's planning documents.

- Seasonal surface water is present adjacent to the stressed vegetation area. The groundwater table is also shallow in this area (less than 5 feet bgs). The contractor shall be prepared to manage surface/standing water and saturated soil and excavate to the vertical extent of contaminated soil, or to a maximum depth of 15 feet bgs, to the extent practicable.
- The contractor shall backfill the excavation area(s) only after it is verified by analytical results that all contaminated soil has been removed or as approved by the Corps. Clean backfill material shall be used. The contractor shall backfill the excavation in two-foot lifts and use the excavating equipment to compact the fill. No testing for degree of compaction is required. The contractor shall evenly spread the reserved topsoil over the excavated areas and recontour the site to match existing topography, to the extent practicable. Previously vegetated areas that are disturbed due to the contaminated soil removal may require seeding with certified weed-free native seed mixture and fertilizer, based on landowner requirements.
- Upon completion of backfill, the site shall be graded and restored to its original condition to the extent practicable. All temporary access roads will be removed unless otherwise authorized by the Corps to remain in-place.

The contractor will be required to prepare several plans pertaining to the protection of the environment, which must be approved by the Corps before work at the site may begin. The contractor shall prepare a comprehensive Environmental Protection Plan (EPP). The contractor has responsibility for adequate and continuing control of pollutants and other environmental protection measures. The EPP shall include, but shall not be limited to, the following (as applicable):

- 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, vines, 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 EPP.
- Methods of protecting surface water and groundwater during construction activities, including spring breakup runoff management.
- Spill prevention and spill cleanup plans.
- Methods to preserve the current historical and archeological setting to the extent practical.

The contractor shall also 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. The contractor shall be responsible for signing any non-hazardous waste manifests and Canadian manifests required for transport.

No details on the potential construction and operation of a landfarm at the Pump Station "L" were available as of the writing of this document. The ADEC regulates the use of landfarming, and provides guidance in its Technical Memorandum "Landfarming at Sites in Alaska" (ADEC 2018). This memorandum covers the applicability, construction standards, monitoring standards, and closure requirements of landfarming; a landfarm established at the Pump Station "L" site will be required to adhere to these standards.

#### **3.0 AFFECTED ENVIRONMENT**

#### 3.1 Community and People

The Pump Station "L" site is uninhabited, and in a sparsely populated region of the Alaskan Interior. The nearest settled areas are the communities of Dot Lake and Dot Lake Village, located along the Alaska Highway roughly 3 miles east-southeast of the project site. "Dot Lake" first appeared on the U.S. Census as an unincorporated village in 1960; and was made a census-designated place (CDP) in 1980. A separate CDP, Dot Lake Village, was created in 2000. Dot Lake Village is the seat of the Native Village of Dot Lake, a traditional Upper Athabascan village and federally recognized tribe. As of 2017, the populations of Dot Lake Village and Dot Lake were 39 and 17, respectively (ADCRA 2018). Tanacross (about 40 miles to the southeast) and Deltana (about 36 miles to the northwest) are the next closest communities to the project site.

#### 3.2 Current Land Use

The Pump Station "L" site is abandoned, and not known to be used for any purpose. Portions of former pipeline routes sometimes correspond to present-day utility right-of-ways, which become well-used off-road travel corridors for snowmachines and all-terrain vehicles; however, there appear to be no established trails associated with Pump Station "L".

#### 3.3 Climate

The site is located in Interior Alaska's continental climate zone. In winter, ice fog and smoke conditions are common. The average low temperature in the area in January is -32 °F, and the

average high in July is 72 °F. Extreme temperatures have been recorded from -71°F in winter to 99 °F in summer. Average annual precipitation is 11 inches, with 33 inches of snow (ADCRA 2018).

#### 3.4 Topography, Soils, and Hydrology

Much of the CANOL pipeline route in Interior Alaska follows the Tanana River Valley, a broad swath of relatively low land stretching from the Tanana River headwaters at the confluence of the Nabesna and Chisana Rivers near Northway, Alaska, northwest to the Yukon River. This region is characterized by extensive wetlands, numerous streams, and water bodies ranging from tiny ponds to large lakes, and gently rolling hills in more upland areas. Soils are predominantly alluvial deposits of sand and rounded gravel, overlain by a thin layer of silt and fine sand, with peat in some areas. The Pump Station "L" site appears to be located on a low terrace overlooking the Tanana River floodplain (figure 5).

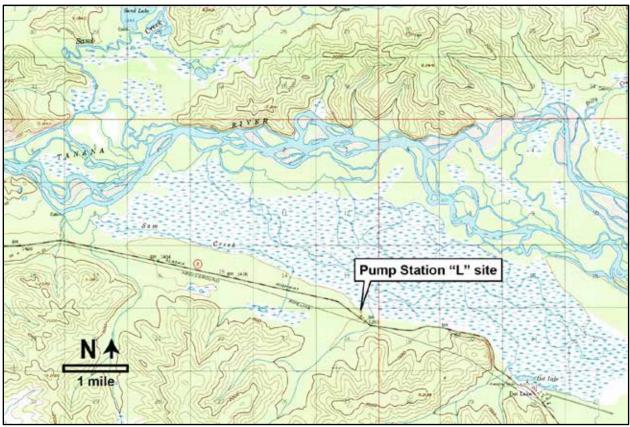


Figure 5. Annotated excerpt from US Geological Survey map "Mount Hayes C-1" (1955), showing project location in relation to the Tanana River valley and floodplain.

#### 3.5 Air Quality and Noise

No information exists on air quality near the project site, although it is assumed to be generally good due to the relatively low number and density of air pollutant sources along the sparsely

populated highway and pipeline corridor. The most likely type of air pollutant to be present would be particulates from dust lofted by off-road vehicles, wildfires, and wood burned for heating. Particulate concentrations from wood smoke may become notably elevated within valleys and other low-elevation areas during the winter.

The major source of noise at the project site is probably from vehicles using the nearby Alaska Highway. All-terrain vehicles, snow-machines, light aircraft, and generators would also contribute to noise levels locally.

#### 3.6 Biological Resources

Upland vegetation is boreal forest consisting primarily of black spruce in wet and poorly drained areas and white spruce on drier sites. Quaking aspen commonly occurs on well-drained, south-facing slopes, and along with paper birch, often occurs in recently burned or disturbed areas. Balsam poplar is common along water courses. As elevation increases, dense spruce gives way to open spruce woodlands mixed with tall shrubs, then dwarf-shrub communities, and finally alpine tundra. Shrubs are most common along streams and water bodies, within recently burned areas, and along gullies that drain subalpine tundra. The shrub component is primarily willow, alder, and dwarf birch (USFWS 2011).

Large mammals include herbivores such as moose and caribou, and carnivores such as wolves, coyotes, black bears, brown bears, and lynx. Porcupines, beavers, muskrats, hares, and voles are also common (USFWS 2011).

The Tanana River Valley is on a major bird migration corridor and has a high diversity of species compared with other Interior Alaska regions. Ducks, geese, swans, and other water birds make heavy use of the rivers, lakes, and wetlands. Bald and golden eagles, ospreys, hawks, and owls are known to breed in the area. Ground birds include spruce grouse, ruffed grouse, sharp-tailed grouse, and willow ptarmigan. The most common migratory songbirds are slate-colored junco, Swainson's thrush, Wilson's warbler, ruby-crowned kinglet, yellow-rumped warbler, and orange-crowned warbler. Year-round residents include ravens, gray jays, black-billed magpies, black-capped chickadees, boreal chickadees, and redpolls (USFWS 2011).

Arctic grayling, burbot, lake trout, northern pike, and humpback whitefish are present in area lakes and streams. There are no significant salmon runs in the upper Tanana River drainage, but small runs of chum salmon and an occasional king and coho have been recorded (USFWS 2011).

#### 3.7 Wetlands

The project sites have not been individually evaluated for the presence of jurisdictional wetlands. The U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory website shows the Tanana River Valley to be a complex mosaic of freshwater emergent and forested wetlands, uplands, and riverine habitat (USFWS 2018a).

#### 3.8 Threatened and Endangered Species

No species listed as endangered or threatened under the Endangered Species Act are present in Interior Alaska. This area is within the historical range of the wood bison (listed as "threatened"), but until very recently, no wild populations of wood bison existed in Interior Alaska. An experimental herd of 150 wood bison was released in 2015, but in the Innoko Flats region about 350 miles to the west of the Tanana River Valley (ADN 2015).

#### 3.9 Essential Fish Habitat and Anadromous Streams

The Alaska Department of Fish & Game's (ADFG) Anadromous Waters Catalog (AWC) lists numerous anadromous streams flowing into the upper Tanana River Valley, including the Nabesna, Chisana, Tok, Johnson, and Delta Rivers, and the Tanana River itself. The Tanana River is assigned the AWC number 334-40-11000-2490; along the reach closest to a proposed project site, ADFG reports this river to have chum, coho, and king salmon "present" (ADFG 2018).

No marine essential fish habitat (EFH) as designated by the National Marine Fisheries Service (NMFS) exists near any of the project sites.

#### 3.10 Cultural and Historic Resources

In September 2018, Corps archaeologist Joseph Sparaga conducted a pedestrian survey of the property. During the survey, a number of the structures from the original construction plans of the pump station were identified, as well as areas missing structures identified in the plot plans. The pump station cement foundation, and assorted lumber and metal piping, are still present. The garage structure has completely fallen over, and is slowly being taken over by vegetation. The above ground storage tanks have been removed, but their bases are still present (Sparaga 2018).

#### 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 would remain in place, which would limit the use of the area by the community and potentially allow the migration of chemical contaminants to groundwater.

#### 4.2 Preferred Alternatives

Under the preferred alternatives, contaminated soils would be excavated from the site to the extent practical, and the excavation would be backfilled with clean material. The potential environmental consequences are described below. The environmental impacts of both the on-site and off-site alternatives are discussed, particularly where they may differ.

#### 4.3 Land Use and Ownership

Work near the Alaska Highway would be coordinated with the Alaska Department of Transportation & Public Facilities to ensure public and worker safety. The proposed work would take place only on properties with which the Corps has a signed Right-of-Entry with the landowner; the project would have no impact on land ownership. There is no evidence of local use of the project area.

The off-site remedial alternative would require frequent truck traffic exiting and entering the Alaska Highway adjacent to the project site, as contaminated soil is transported to an off-site remediation center. This activity would increase the risk of delays and accidents for other highway users, and probably require the contractor to provide active traffic control.

#### 4.4 Effects on Air Quality and Noise

Air quality may be affected during the project period due to the use of heavy equipment, vehicles, and generators. The Corps determines that any poor air quality conditions caused by the project would be transient and highly localized, and would dissipate entirely at the end of the project.

The frequent truck traffic required by the off-site remedial alternative would result in significantly greater vehicle emissions relative to the landfarming alternative. Soil tracked onto the highway, and dust lofted from site access roads will also increase airborne particulate levels in the area if effective best management practices are not employed to limit fugitive dust.

A landfarm can also be a source of fugitive dust, and ADEC guidance (ADEC 2018) recommends a cover in some circumstances. The ADEC guidance does not address potential emissions of petroleum hydrocarbons volatilizing from the contaminated soil in the landfarm.

The movement of trucks and equipment into and out of the project along local roads would increase the levels of noise in the local area during several weeks of the working season; significantly more vehicular noise would be generated by the off-site remedial alternative.

All remedial activities would be timed to minimize the level of interference with the lives of the local residents and recreational users.

The Corps will use best management practices to reduce any short-term deterioration of air quality and the aural environment to less-than-significant levels, and anticipates no long term adverse effects under either remedial alternative.

#### 4.5 Effects on Topography, Soils, and Hydrology

The small areas of excavation would not significantly alter the topography or patterns of

overland water flow in the area. The backfilled excavations would be contoured to match the original grade to the extent practical.

#### 4.6 Effects on Biological Resources

The planned activities would be highly localized in their impacts and affect areas already heavily altered by the former military facilities, past cleanup efforts, and current day usage. A small amount of brush may need to be cleared to access specific features. The activities would have little effect on local wildlife and no long-term negative impact on their habitat. The project site is surrounded by large areas of similar, higher-quality habitat, and any wildlife displaced from the project area by noise and activity should be able to quickly resume their natural behavior. The on-site remedial alternative would require slightly more woodland to be cleared (less than 0.5 acre) than under the off-site remedial alternative, but the off-site remedial alternative would require a greater movement of vehicles in and out of the site, increasing disturbances to local wildlife. Corps anticipates <u>no significant adverse long-term effects</u> to the local habitat under either alternative.

Nesting birds are likely to be the most vulnerable animal species at the site. The destruction of active nests, eggs, or nestlings is a violation of the Migratory Bird Treaty Act (MBTA). The U.S. Fish and Wildlife Service advises that the period 1 May through 15 July should be considered the nesting window for forest- or shrub-nesting birds in Interior Alaska (USFWS 2009). The project activities may overlap this nesting window. One means of avoiding a "taking" of nesting birds under the MBTA would be to perform the necessary brush and tree removal before the start of the nesting window. The Corps will require its contractors to observe this window to the extent practicable. The Corps <u>does not anticipate a taking</u> under the MBTA under either remedial alternative.

#### 4.7 Effects on Wetlands

The project areas have not been delineated for jurisdictional wetlands, but the reported presence of standing water in vegetated portions of the project site strongly suggests that some sort of wetland is present. The intent of the contaminated soil removal action is to continue excavating soil until clean limits (as determined by field screening and confirmation sampling) are reached; therefore, the extent of wetlands that may be affected by project activities is not known in advance.

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 1502.21) the analyses under NEPA and CWA Section 404(b)(1) performed for the issuance 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." The State of Alaska certified the full list of Nationwide Permits (NWPs) issued by the Corps in 2012, so no separate Section 401 Certificate of Reasonable Assurance is required for these FUDS removal actions, which fall 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 Corps is adopting the analysis behind the NWP and not the permit itself.

The removal of chemical contaminants from the project site is a remedial action in its own right that benefits the overall environment, and the Corps does not intend to mitigate for or attempt to restore the small areas of wetlands that may be lost in the course of the project excavation and backfilling activities. The Corps anticipates <u>no significant loss to local wetland habitat or function</u> as a result of the proposed project under either remedial alternative.

#### 4.7 Effects on Endangered and Threatened Species

The Corps determines that the planned activities, including either remedial alternative, would have <u>no effect</u> on any species listed under the Endangered Species Act or their critical habitat, as none exists in the project area.

#### 4.8 Effects on Essential Fish Habitat and Anadromous Streams

The project, under either remedial alternative, would not require crossing or altering any anadromous streams and so will have <u>no adverse effect on essential fish habitat</u>. The Corps' contractors will minimize the risk of mobilizing sediment from the project site using appropriate best management practices.

#### 4.9 Effects on Cultural Resources

The Corps archaeologists have concluded that the proposed 2019 removal action will have little effect on the remaining historic features at the project site. The only structural remains that will be removed from the site are concrete supports, which have been vandalized and are an advanced stage of degradation. The containers and metallic debris dating from military use of the site are mixed with modern trash such as beverage cans and camp fuel containers, and some of the metallic debris has been damaged by target practice (Sparaga 2018).

The Corps determines that the proposed 2019 removal action, including either remedial alternative, will result in <u>no historic properties adversely affected</u>, and has sought concurrence with that determination from the State Historic Preservation Officer.

#### 4.10 Effects on Coastal Zone Management

The project sites are not within current or former coastal management zone. Alaska withdrew from the voluntary National Coastal Zone Management Program (http://coastalmanagement.noaa.gov/programs/czm.html) on July 1, 2011. Within the State of

Alaska, the Federal consistency requirements under the Coastal Zone Management Act do not apply to Federal agencies, those seeking forms of Federal authorization, and state and local government entities applying for Federal assistance.

#### 4.11 Effects on Environmental Justice

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

One of the nearest human communities to the project site is Dot Lake Village, which is predominantly Native Alaskan and therefore a minority population (ADCRA 2018). However, the purpose of the proposed project is to reduce risks to human health and welfare in the region by removing contaminants from the environment. Dot Lake Village is roughly 3 miles away from the project, and should experience no direct adverse effects from the removal action, although any project-related delays to traffic along the Alaska Highway may inconvenience local users in general to a greater degree. The Corps <u>does not anticipate disproportionate high and adverse effects to minority or low-income populations</u> as a result of this project, under either remedial alternative.

#### 4.12 Cumulative Effects

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

The proposed project would have the ultimate net effect of removing chemical contamination from the environment. 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. Because of the small size of the project area, the proposed project is unlikely to indirectly contribute to long-term changes in land use and environmental quality by encouraging use of the restored land. The Corps identifies <u>no adverse cumulative effects</u> resulting from the proposed project under either remedial alternative.

#### 5.0 Permits and Authorizations

The project described in this EA would require few resource permits or authorizations. The Corps will continue consultation with the SHPO and other interested parties on mitigation for adverse effects to the CANOL Pump Station "L" site. Backfilling of the excavation at one or more of the sites has the potential to constitute a discharge to wetlands; however, the Corps does not issue itself CWA permits for its activities. The Corps incorporates by reference the analyses under NEPA and CWA Section 404(b)(1) performed for the issuance of Nationwide Permit No.

38, "Cleanup of Hazardous and Toxic Waste"; no further authorization under the CWA is required.

#### **6.0 CONCLUSION**

The continued environmental cleanup efforts along the CANOL pipeline, 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, regardless of which remedial alternative is chosen; therefore, a finding of no significant impact (FONSI) will be signed by the Corps.

#### 7.0 PREPARERS OF THIS DOCUMENT

This environmental assessment was prepared by Chris Floyd and Joseph Sparaga of the Environmental Resources Section. The Corps project manager is Rena Flint of the Environmental and Special Programs Branch, Alaska District, U.S. Army Corps of Engineers.

#### **8.0 REFERENCES**

Alaska Division of Community and Regional Affairs (ADCRA). 2018. Community Database Online: http://www.dced.state.ak.us/dca/commdb/CF\_CIS.htm.

Alaska Department of Environmental Conservation (ADEC). 2018. Technical Memorandum "Landfarming at Sites in Alaska", Division of Spill Prevention and Response. January 2018.

ADEC. 2018. Title 18 Alaska Administrative Code Chapter 75: Oil and other Hazardous Substances Pollution Control (as amended through 29 September 2018).

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