Environmental Resources Section

Public Notice

Alaska District
U.S. Army Corps of Engineers

Date 5 Nov 2018 Identification No.ER-19-002
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
Source and Incidental Contamination Removal Action
Cape Prominence
Formerly Used Defense Site (FUDS) - F10AK080601)
Unalaska Island, 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: www.poa.usace.army.mil. Click on the Reports and Studies button, look under Documents Available for Public Review, and then click on the Environmental Cleanup link.

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

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

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

Sincerely,

for

Michael R. Salyer
Chief, Environmental Resources Section

US Army Corps of Engineers
Alaska District

Environmental Assessment and Finding of No Significant Impact

Source and Incidental Contamination Removal Action
2019

Cape Prominence

Unalaska Island, Alaska
F10AK080601

Formerly Used Defense Sites Program

November 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:

CON/HTRW Removal Action
Cape Prominence
Unalaska Island, Alaska

This action will include the removal and proper off-site disposal of drums, storage tanks, and other containerized wastes, as well as fuel- and mercury-contaminated soil, resulting from military occupation of Cape Prominence during World War II.

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 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 Unalaska Island.

_____ _____

Philip J. Borders Date
Colonel, Corps of Engineers
District Commander

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) under the National Environmental Policy Act (NEPA) to address the removal of containerized waste and contaminated soil at the Cape Prominence former military facilities on Unalaska Island, 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 containerized waste and petroleum products, both of which fall outside the purview of CERCLA.

1.2 Site Description and History

Cape Prominence is approximately 30 air miles south of Dutch Harbor on a remote peninsula between Open Bay and Usof Bay on the southcentral coast of Unalaska Island. It is located at Latitude 53°20'30'' and Longitude 166°45'30'' (Figure 1). The site was operated as a radar installation by the United States Army during World War II. The site covers approximately 160 acres and consists of two main areas: the Lower Camp located near the shoreline in a natural valley and the Upper Camp located south of the Lower Camp high on the bluff (Figure 2). The Upper and Lower Camp areas are described below using historical names/features from previous reports and new information from the 2017 site investigation (USACE 2018a):

Upper Camp - At the Upper Camp, there are approximately 6 main former structure areas. Some areas contain significant amounts of wood and miscellaneous debris; other areas only contain a building footprint. These former structures include the following: Powerhouse #1, Powerhouse #2, Hoist House, Quonset Hut, Latrine, and Storage Building. Underground Storage Tanks (USTs) were located at Powerhouse #1 and Powerhouse #2. No UST was identified at the Hoist House. A utility pole, miscellaneous metal debris, and steel conduit were also present at the Upper Camp. No transformers were identified. At the top of the former tramway, steel track, wire rope, and rollers were visible but disappear beneath the ground surface approximately 50 feet downhill. Wood from the tramway bracing and Hoist House was also present. A pond containing approximately 10 empty partially intact 55-gallon drums and approximately 5 sets of 55-gallon drum rings, all in various states of decay, were located horizontally 1,200 feet east and 1,000 vertically below the main Upper Camp.

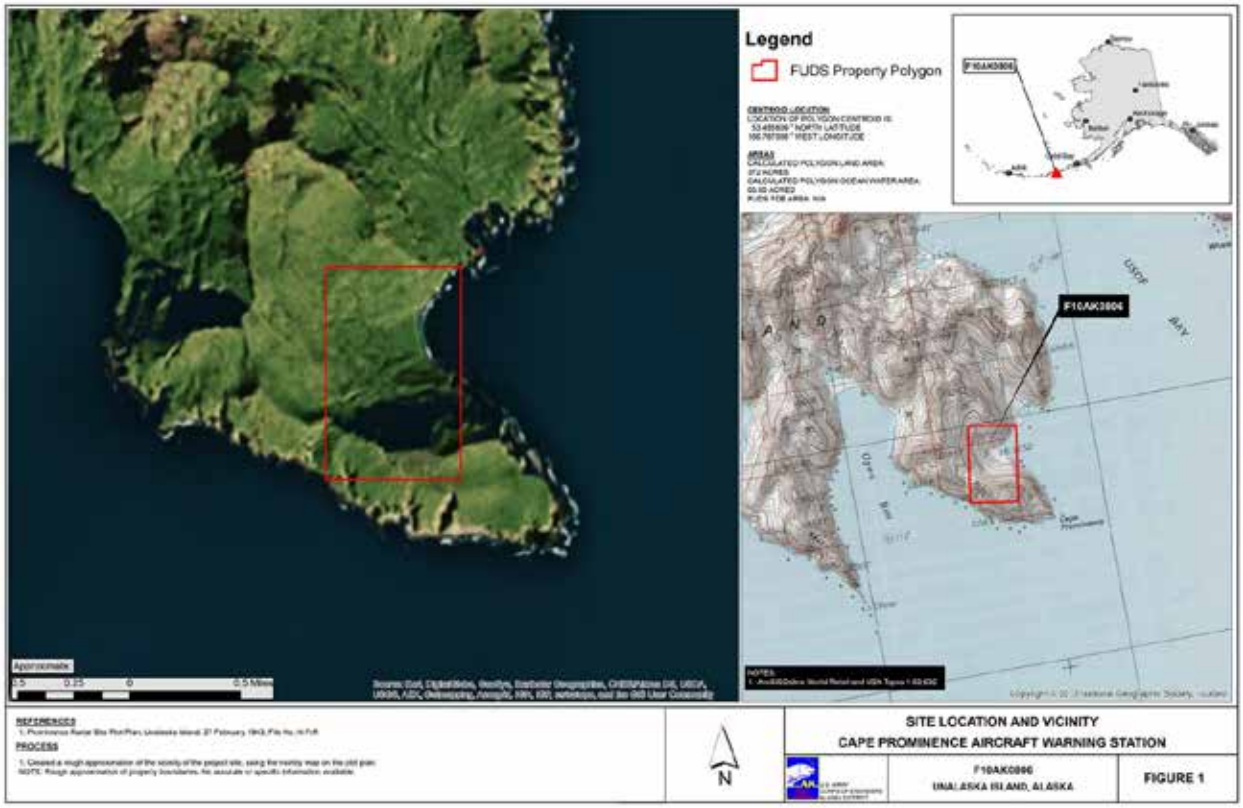

Figure 1. Location and vicinity of the Cape Prominence project site (from USACE 2018a)

Lower Camp - At the Lower Camp, there are approximately 5 collapsed wooden structures. These former structures include the following: Powerhouse, Standby Powerhouse, Barracks Building #1, Barracks Building #2, and Headquarters Building. Other structures include the Water Storage Tank and Dam and 4 Quonset Hut footprints. One Aboveground Storage Tank (AST) was identified at Barracks Building #1, one AST was identified at Barracks Building #2, and one UST was identified at the Powerhouse. Additionally, utility poles, steel conduit, and miscellaneous metal debris including drums were present. No transformers were identified. At the bottom of the former tramway, minor steel track was exposed. The remainder of the tramway was presumed to be present below the ground surface. No tram platform was identified at the base of the tram. Only one drum pile was identified near the Powerhouse. Several empty scattered 55-gallon drums were identified in various states of decay across the Lower Camp area.

In 2017 the Corps performed a site investigation (SI) at Cape Prominence. The primary purpose of the 2017 SI was to gather information to perform a potential future removal action. Soil, sediment, and surface water were sampled at both the Upper Camp and Lower Camp. USTs, ASTs, drums, and other tanks were inspected and documented, including contents (USACE 2018a). The 2017 SI determined that the most significant contaminants of potential concern (COPC) were diesel-range organics (DRO) and residual range organics (RRO) in soil, which were identified above State of Alaska cleanup limits.

Figure 2. Cape Prominence site features (from USACE 2018a).

The findings of the 2017 SI include the following (USACE 2018b):

- All Upper Camp and Lower Camp USTs, ASTs, 55-gallon drums, and tanks - All drums and tanks were empty or had a minor amount of water. USTs appeared to be in fairly good condition. All ASTs, 55-gallon drums, and tanks were in various stages of severe decomposition. No free product was identified in any UST, AST, 55-gallon drums, or tanks.
- Upper Camp Soil - Powerhouse #1UST analytical results from soil samples collected at or near the base of the tank (one from each tank end from 3.0 – 3.5 feet bgs) were 8,900 mg/kg DRO and 12,000 mg/kg DRO. Powerhouse #2 UST analytical results from a soil sample collected near the base of one end of the tank (from 3.0 – 3.5 feet bgs) was 15,000 mg/kg. The volume of contaminated soil appears to be limited in vertical and horizontal extent at both powerhouses. Data and field observations support that very limited mobilization, if any, has occurred since the soil was impacted by fuel. Each UST would have contained as much as 300 gallons of fuel and was only used for a maximum of 2 years. Natural attenuation will likely continue to occur and reduce DRO concentrations in soil. Estimated volume of POL contaminated soil above ADEC Method Two Soil Cleanup Levels at Upper Camp is 20 – 30 loose cubic yards.
- Upper Camp Sediment/Surface Water – Pond sediment and surface water were not significantly impacted by the former military activities. Acenaphthene and acenaphthylene, both PAHs, were detected above screening ecological criteria in the pond sediment but not at significant concentrations. The pond is very likely ephemeral in nature and therefore unlikely to contain significant ecological receptors.
- Drum carcasses and drum rings remain within and upgradient from the pond.
- Lower Camp Soil - Powerhouse UST analytical results from a soil sample collected near the base of one end of the tank (from 3.0 – 3.5 feet bgs) was 35,000 mg/kg DRO. The Powerhouse floor analytical results from a soil sample located in the floor footprint near the pathway/drainage area was 13,000 RRO. The Drum Dump near the Powerhouse contained a soil sample collected from beneath a small drum pile of 28,000 mg/kg DRO. The volume of contaminated soil appears to be limited in vertical and horizontal extent at the powerhouse. Data and field observations support that very limited mobilization, if any, has occurred since the soil was impacted by fuel. The UST would have contained as much as 300 gallons of fuel and was only used for a maximum of 2 years. Natural attenuation will likely continue to occur and reduce DRO/RRO concentrations in soil. Estimated volume of POL contaminated soil above ADEC Method Two Soil Cleanup Levels at Lower Camp is 35 – 45 loose cubic yards.
- Lower Camp Sediment/Surface Water – Stream sediment and surface water were not significantly impacted by the former military activities. Nickel in sediment was detected

above ecological screening criteria in sediment but is not at significant concentrations and is likely within background levels

1.3 Need for Action

The 2017 site investigation identified chemical contamination of soil, as well as containerized wastes that, unless removed from the site, will eventually migrate further into the environment. The Corps is required to pursue remedial actions at the Cape Prominence site under its DERP-FUDS authority and State of Alaska environmental regulations.

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 removal of containerized wastes and excavation of soil. However, under the no-action alternative, the waste products and contaminated soil would remain in place. This would potentially allow the migration of chemical contaminants to adjacent wetland and marine habitat.

2.2 Removal Action Alternative

Excavation of contaminated soil and removal of contaminant sources is the only action alternative presented in this EA. The Corps' experience with environmental cleanup projects in Alaska has shown that *in situ* remediation or natural attenuation strategies tend not to be practicable or economically feasible at small, remote contaminated sites due to cold temperatures and the high costs of maintenance and monitoring. In such situations, direct removal and treatment of contaminated soil is generally the fastest, surest, and most economical means of eliminating or reducing environmental contamination.

2.3 Preferred Alternative

The removal action alternative to remove containerized wastes and contaminated soil is the preferred alternative. The project scope (USACE 2018b) includes the following tasks:

- Empty, remove, and properly dispose of two underground storage tanks associated with the Upper Camp power houses and any scattered drums (estimated at 100 pounds) at the Upper Camp project site. Characterize and recover any free-product generated during this effort for proper transport/disposal offsite. Any water present within the USTs or generated during the cleaning process will be properly treated for onsite disposal.
- Excavate, transport, and dispose of offsite of up to 100 tons of fuel-contaminated soil from the Upper Camp site, using field-screening to guide the extent of soil excavation. Any wood debris visibly stained with fuel will also be removed and disposed of.

- Empty, remove, and properly dispose of four fuel storage tanks associated with the Lower Camp as well as any scattered drums at the Lower Camp site. Characterize and recover any free-product generated during this effort for proper transport/disposal offsite. Any water present within the tanks or generated during the cleaning process will be properly treated for onsite disposal.
- Excavate, transport, and dispose of offsite of up to 1000 tons of fuel-contaminated soil from the Lower Camp site, using field-screening to guide the extent of soil excavation. Any wood debris visibly stained with fuel will also be removed and disposed of.
- Excavate, transport, and dispose of offsite of up to 10 tons of mercury-contaminated soil from the Lower Camp, primarily focusing on the Standby Powerhouse foundation.
- Excavate, recover, and properly dispose of 1 small AST and up to 200 pounds of drums and drum debris encountered at the pond area site including scattered drums in the immediate area. Characterize and recover any tank or drum contents generated during this effort for proper transport/disposal offsite.
- Install, develop and sample up to 6 groundwater monitoring wells at the lower camp.

2.4 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 (USACE 2018b):

- 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, 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.
- 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.
- Methods of protecting surface water and groundwater during construction activities, including spring breakup runoff management.
- Methods to preserve the current historical and archeological setting to the extent practical.
- Known historical, archaeological and cultural resources within the contractor's work area have been designated by the government. The contractor shall install protection for these resources and shall be responsible for their preservation during the contract. If, during work activities, the contractor observes items that might have historical or archaeological value,

such observations shall be reported immediately to the QAR and KO and a *USACE Cultural Resource Notification Form* shall be filled out 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 adverse impacts to these resources and shall prevent its employees from trespassing on, removing or otherwise damaging such resources.

- Daily inspections of vehicles, fuel containers, and other potential contaminant sources for leaks, and maintenance of spill-response equipment and materials in accordance to the project accident prevention plan (appended to the work plan).
- Watching for and avoiding marine mammals during operations of project support vessels.
- Watching for possible ground-nesting birds near the 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, or spreading the existing Unalaska Island rat population.

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 (USACE 2018b).

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 engaged 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 (USACE 2018b).

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 specified in this SOW. The contractor shall ensure that there is sufficient details 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 would 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. The site access plan should include methods of access that minimize site disturbances.

3.0 AFFECTED ENVIRONMENT

3.1 Community

The nearest human community to the project site is the City of Unalaska, about 32 miles from the site by air (straight-line distance), or roughly 70 miles by boat. No roads connect the project site with the Unalaska Island (ADCCED 2018).

3.2 Current Land Use

The project area is uninhabited, and extremely remote and difficult to access, reachable only by helicopter or boat. Cape Prominence is within the Aleutian Islands Unit of the Alaska Maritime National Wildlife Refuge (Refuge).

3.3 Climate

Unalaska Island is within the subpolar oceanic climate zone, characterized by persistently overcast skies, moderated temperatures, high winds, and frequent storms. Winter squalls produce wind gusts in excess of 120 mph. During the summer, extensive fog forms over the Bering Sea and North Pacific. Average temperatures range from 20 to 60 °F. Total precipitation is 64 inches annually, with an average accumulated snowfall of 100 inches, which however tends to melt soon after falling (ADCCED 2018).

3.4 Topography, Soils, and Hydrology

Unalaska Island is predominantly volcanic, and its rugged southern coast is characterized by sharply carved sea cliffs and numerous deep bays. Parts of the Upper Camp area are at an elevation of over 1,000 feet above sea level, while the Lower Camp area, less than a mile away, is about 200 feet above sea level. The hydrology at Cape Prominence is different at each camp location. No surface water was present at the Upper Camp, which resides on the ridgetop overlooking the ocean. Some surface water may exist for short periods of time following heavy rain events or major snow melting events when the ground is frozen. One pond is located between the Upper Camp and the beach cliff (east of the Upper Camp) located approximately 1,000 feet lower in elevation. The groundwater hydrology is unknown. At the Lower Camp, which lies north of the Upper Camp in the relatively low lying bay area, small streams drain the surrounding topographic highs and converge to form a larger stream which empties into the ocean east of the Lower Camp. The large stream drains the entire Lower Camp. The groundwater hydrology is unknown at the Lower Camp; however, surface water seepage suggests some groundwater exists below the site and that the groundwater potentiometric surface is near the surface in some areas. Groundwater use as a drinking water source is highly unlikely would require a special use permit from the Refuge. The military utilized an upgradient surface water source for fresh water. Random potential visitors would likely access the site from the beach and acquire surface water from the local stream (USACE 2018b).

3.5 Air Quality and Noise

The remote and uninhabited southern coast of Unalaska Island presumably enjoys excellent air quality because of the near-absence of pollutant emission sources and persistent winds from the adjacent ocean. Aircraft, ships, 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 Unalaska Island. There is no established ambient air quality monitoring program at Unalaska 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 the Cape Prominence area, but man-made background noise would consist solely of that generated by passing ship, boat, and aircraft traffic.

3.6 Habitat and Wildlife

Both the Lower Camp and Upper Camp areas are treeless, as is the rest of Unalaska Island. The Upper Camp vegetation tends to consist of very low-growing grasses, forbs, and mosses existing on a thin soil horizon (figure 3); more lush and diverse plant communities can be found on more sheltered slopes and in wetter areas, such as around the Upper Camp pond. The Lower Camp area has a more typical Alaska maritime community of grasses, ferns, and forbs such as fireweed and cow parsnip (figure 4).

Unalaska Island is home to hundreds of species of birds, including seabirds such as puffins, auklets, cormorants, and gulls. Usof Bay reportedly hosts breeding colonies of glaucous-winged gull, tufted puffin, double-crested cormorant, and pigeon guillimot (Seabirds.net 2018). Many waterfowl, such as emperor geese, eiders, loons, and grebes, winter in protected ice-free bays and inlets. Bald eagles are common along the coast. Inland birds include raven, ptarmigan, peregrine falcon, and songbirds such as fox sparrow and gray-cheeked rosy finch; ptarmigan were noted at the project site during the 2017 SI

The only land mammals currently existing on Unalaska Island are red fox, arctic ground squirrel, and a few species of small rodents such as voles and lemmings; it is unclear which of these are indigenous or introduced (Peterson 1967). Introduced Norwegian rats and house mice are well established on the island. A single red fox was observed at the project site during the 2017 SI. 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.

Figure 3. A view from the Upper Camp tram terminus, looking down on the Lower Camp area, June 2017.

Figure 4. The Lower Camp Standby Powerplant, and surrounding vegetation, June 2017.

3.7 Protected Species

Endangered Species Act. Table 1 below summarizes the species protected under the Endangered Species Act, under the jurisdiction of either the NMFS or the USFWS that are identified as potentially being in the project activity area, including the marine waters offshore of Unalaska Island.

This list was created using NMFS and USFWS on-line resources (NMFS 2018a; USFWS 2018) and from informal consultation conducted recently for other similar Aleutian Island sites (NMFS 2017; USFWS 2015).

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
Stellers eider, *Polysticta stelleri*	All	Threatened	USFWS
Short tailed albatross, *Phoebastria albatrus*	All	Endangered	USFWS

DPS: Distinct Population Segment

Figure 5, provided by the NMFS (NMFS 2017), shows a known Steller sea lion use area at Whalebone Point, roughly 4 miles away from the project site. The nearest (by sea) NMFS-designated critical habitat areas for Steller sea lions are the Unalaska/Cape Izigan haulout (about 40 miles west-southwest of Cape Prominence) and the Unalaska/Inner Signal haulout (about 36 miles northeast of Cape Prominence). The nearest designated rookery is on the southwest coast of Akutan Island, over 50 straight-line miles from the project site.

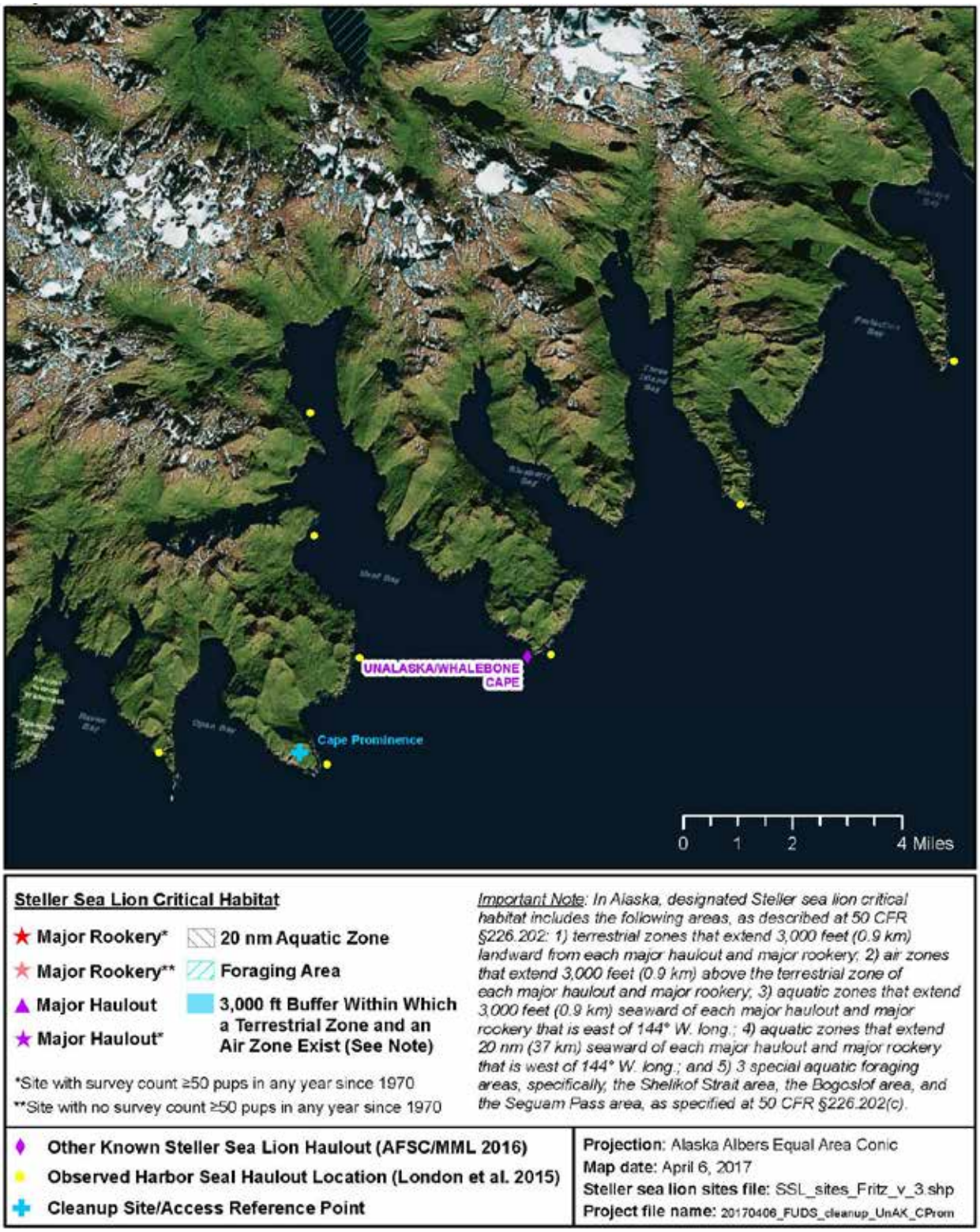

Figure 5. Steller sea lion critical habitat and other use areas near Cape Prominence (NMFS 2017).

With no rookeries present within or near Usof Bay, the area is 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).

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; the nearest of these roughly 80 miles to the east of Unalaska Island. Recent guidance from the NMFS on humpback whales (NMFS 2016) discusses the three 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.

Northern sea otter critical habitat designated by the USFWS (USFWS 2009) includes coastal Unalaska Island waters. The critical habitat final rule also 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.

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 up-wellings occur near the coast. No critical habitat is currently designated for this species (USFWS 2008).

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

Marine Mammal Protection Act. The 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 2017c) 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 Unalaska 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 2011). In the absence of trees, bald eagles in the Aleutian Islands typically nest at the tops of sea-stacks or cliffs (Byrd & Williams 2008), both of which exist near the project site. No bald eagle nests were noted by field personnel during the 2017 SI, although bald eagles may be expected foraging anywhere along the Unalaska 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

In the absence of a wetlands delineation, the entire project area will be regarded as probable jurisdictional wetlands.

3.8 Anadromous Streams and Essential Fish Habitat

The Alaska Department of Fish and Game (ADFG) identifies in its Anadromous Waters Catalog (AWC; ADFG 2018) three anadromous streams flowing into Usof Bay, all reported as spawning habitat for pink salmon. These streams approach the bay along steep slopes, and appear to have limited reaches of anadromous fish habitat. None of these anadromous waters are within or adjacent the project area. Fish were noted in the small stream that crosses the Lower Camp area, but not identified by species; that stream is not in the AWC.

The marine waters of Usof Bay are within areas designated by the NMFS under the Magnuson-Stevens Fishery Conservation and Management Act (MSA) as essential fish habitat (EFH) for weathervane scallop, northern rockfish, rock sole, sculpin, walleye pollack, skate, squid, chum salmon, pink salmon, coho salmon, sockeye salmon, and chinook salmon. No NMFS-designated Habitat Areas of Particular Concern (HAPCs) or EFH Areas Protected from Fishing (EFHAs) are near the project site.

3.9 Cultural and Historic Resource

The Cape Prominence World War II site is the only identified historic resource located within the proposed project's area of potential effect. In 2017 USACE archaeologists determined that Cape Prominence was eligible for the National Register of Historic Places (NRHP) under Criteria A (events) and C (design). The determination of eligibility specifically calls out building

revetments and the tramway as contributing to the significance of the site. No standing structures are located on the site, and much of the historic debris associated with footprints has suffered heavily from wind and water erosion. No obvious deviations from the plot-plans in regards to site layout were recorded. Additionally, any site specific modifications to structures were not identified due to the lack of integrity of the buildings and structures themselves. USACE archaeologists surveyed all footprints at the site and did not record cultural material other than building debris (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 light construction equipment and excavation of soil. However, the contaminated soil and waste materials would remain in place, where it will continue to present a physical hazard and potentially allow the spread of chemical contaminants to the nearby environment.

4.2 Preferred Alternative

Under the preferred alternative, contaminated soils and waste materials would be removed from the site 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 Unalaska 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 Unalaska Island. The project is being closely coordinated with the Refuge.

4.2.2 Effects on Topography, Soils, and Hydrology

The small 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 Corps 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 sites 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 Migratory Bird Treaty Act (MBTA).

4.2.5 Effects on Protected Species

The principle 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 vessels travel to Cape Prominence and back, and as the landing craft shuttles equipment and material between the barge and the shore. While ship strikes on whales are an issue of increasing concern (Neilson et al, 2012; Jensen & Silber 2004), 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 Corps proposes:

- Project 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 the Bay of Islands 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 Cape Prominence project, the Corps will require its contractors to adopt USFWS guidance

for small craft operators, as presented in the USFWS 2009 “Skiff Operation Guidance to Avoid Disturbing Sea Otters”:

- While operating skiffs in near-shore areas, scan the water surface ahead of the boat vigilantly for otters. In choppy water conditions sea otters are difficult to spot. If you are boating with another person, place them in the bow to help search. You may encounter otters as individuals, a mother and a pup, or rafts of 10 or more.

- When you see an otter(s), alter your course and slow down to avoid disturbance and collision. Once you have spotted an otter(s), you should not assume that the otter(s) will dive and get out of the way. Even if they are alert, capable, and do dive, your action of knowingly staying your course would be considered harassment.

- Do not operate a skiff at any rate of speed heading directly at the otter(s). A good rule of thumb is that your buffer should be great enough that there is ample room for the otter(s) to swim away without startling them. It is your responsibility to minimize the stimulus and threat of a loud boat approaching quickly.

- The more otters you see, the wider the berth you need to give. Also, do not pass between otters, but rather go around the outside perimeter, plus add a buffer.

- It is illegal to pursue or chase sea otters. Do not single out or surround an otter(s).

Leaks and releases of fuel and other chemical products from the project vessels also have the potential to cause adverse effects. The Corps will be removing potentially harmful materials from Unalaska Island, including lead residue and petroleum products. These materials will be sealed into salvage drums and impermeable polymer “Supersacks” before being transported from the island and carefully secured aboard the barge for transportation to proper disposal facilities. The Corps 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 Corps 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 Corps determines that the project activities are unlikely to result in the taking of an animal protected under the Marine Mammal Protection Act.

The Corps assesses the probability of the project vessels encountering, let alone affecting, the rare and widely-dispersed short-tailed albatross to be very low. The Corps determines that the project activities will have no effect on short-tailed albatross.

Nesting eagles are possible in the ocean cliffs adjacent to the Usof Bay landing beach, especially to the south of the beach A few transient adult bald eagles may be seen from the project area, but the Corps 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 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 birds nesting in shrub or open habitat in the Aleutian Islands (USFWS 2009) and that any brush-clearing activities should be scheduled for prior to or after this window. The project activities may overlap this nesting window; however, the activities will be focused in limited areas already heavily impacted by human activity and providing less than ideal nesting habitat. The contractors will be instructed to watch for signs of ground-nesting birds, but the Corps considers the risk of a taking under the MBTA to be low.

4.2.6 Effects on Wetlands

Where native soils are removed in the course of removing contamination and debris, wetlands will necessarily 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 would not require entry into or alteration of water bodies, including anadromous streams. 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. Special attention will be paid to avoiding disturbances to the stream observed near the Lower Camp. 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 vessels.

4.2.8 Effects on Cultural Resources

The Corps has determined that the proposed project will result in no adverse effect to historic properties and has sought concurrence on that determination from the State Historic Preservation Officer (Sparaga 2018). A Corps archaeologist will be onsite during the project to monitor the removal of contaminated soil and debris. Revetments will be re-graded following excavations to match their original form as closely as possible, thus preserving the historic landscape.

4.2.9 Effects on Coastal Zone Management

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

4.2.10 Effects on Environmental Justice

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

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

4.2.11 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 a large mass of 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. Given the current restricted public access to the land and its ownership by the USFWS, the restoration of the site would not be expected to encourage development of the area.

5.0 PERMITS AND AUTHORIZATIONS

This continuing project would require no resource permits and few authorizations. The Corps has been closely coordinating its proposed activities with the USFWS Alaska Maritime Wildlife Refuge. The Corps submitted ESA Section 7 determination letters, dated 17 October 2018, to both the USFWS and the NMFS, requesting concurrence with the ESA determinations stated in section 4.2.5 above. An NHPA Section 106 determination letter was sent to the SHPO on 12

October 2018 (Sparaga 2018), seeking concurrence with the determination stated in section 4.2.8.

6.0 CONCLUSION

The continued environmental cleanup efforts at Cape Prominence, 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 Jeremy Craner.

8.0 REFERENCES

Alaska Department of Commerce, Community, and Economic Development (ADCCED). 2018. Community Database Online website: https://www.commerce.alaska.gov/dcra/DCRAExternal/community

Alaska Department of Fish and Game (ADFG). 2018. Anadromous Fish Distribution Database: http://www.sf.adfg.state.ak.us/SARR/AWC/index.cfm/FA/maps.interactive.

Byrd, Vernon and Williams, Jeffrey – USFWS. Distribution and Status of Bald Eagles in the Aleutian Islands. 2008.

Fritts, E. I. 2007. Wildlife and People at Risk: A Plan to Keep Rats Out of Alaska. Alaska Department of Fish and Game. Juneau Alaska.

Jensen, A.S. and G.K. Silber. 2003. Large Whale Ship Strike Database, U.S. Department of Commerce, NOAA Technical Memorandum. NMFS-OPR.

National Marine Fisheries Service (NMFS). 2018a. ESA/MMPA Mapper website: http://alaskafisheries.noaa.gov/mapping/esa/

NMFS. 2018b. National Essential Fish Habitat Mapper: http://www.habitat.noaa.gov/protection/efh/efhmapper/index.html.

NMFS. 2016. Occurrence of Endangered Species Act (ESA) Listed Humpback Whales off Alaska. Revised 12 December 2016.

NMFS. 2008. Recovery Plan for the Steller Sea Lion**,** Eastern and Western Distinct Population Segments (*Eumetopias jubatus*), Revision, National Marine Fisheries Service, National Oceanic and Atmospheric Administration. March 2008.

Neilson, Janet, *et al.* 2012. Summary of Reported Whale-Vessel Collisions in Alaska Waters, Journal of Marine Biology, Vol. 2012, Article ID 106282. October 2012.

Peterson, Richard S. 1967. The Land Mammals of Unalaska: Present Status and Zoogeography, Journal of Mammology, Vol. 48, No. 1, pp 119-129. February 1967.

Seabirds.net. 2018. North Pacific Seabird Data Portal website: http://axiom.seabirds.net/portal.php

Sparaga, Joseph E. 2018. Letter to State Historic Preservation Officer, Cape Prominence AWS determination of effects. 12 October 2018.

U.S. Army Corps of Engineers (USACE). 2018a. Site Investigation Report, Cape Prominence Formerly Used Defense Site, F10AK080601 CON/HTRW, Unalaska Island, Alaska, Final. August 2018.

USACE. 2018b. Scope of Work, Source and Incidental Contaminant Removal Action, Cape Prominence, Unalaska Island, Alaska, Formerly Used Defense Site (F10AK080601). 5 October 2018.

USFWS. 2018. Information, Planning, and Conservation System (IPac) website: http://ecos.fws.gov/ipac/

USFWS. 2015. Letter dated 31 December 2015, subject: Attu Island Formerly Used Defense Site Environmental Clean-up (Consultation Number 07CAAN00-2016-I-0049).

USFWS. 2009. ADVISORY: Recommended Time Periods for Avoiding Vegetation Clearing in Alaska in order to Protect Migratory Birds.