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DRAFT FINDING OF NO SIGNIFICANT IMPACT
Scammon Bay Bulk Fuel Upgrades

Scammon Bay, Alaska

This Finding of No Significant Impact is submitted pursuant to:

Title 45 CFR Part 900

Decision

The Alaska Energy Authority (AEA), in cooperation with the Denali Commission (DC), has determined that the selected course of action for replacing and relocating the Askinuk Corporation's bulk fuel storage facility (tank farm) in Scammon Bay, Alaska, will have no significant impact on the human or natural environment. The selected course of action is described as the Proposed Action in the *Scammon Bay Bulk Fuel Upgrades Environmental Assessment* (EA) (HDL Engineering Consultants, LLC. [HDL], September 2021), hereafter referred to as the Selected Alternative. The Selected Alternative meets the stated purpose and need of the project while minimizing impacts to the human and natural environment. Comments received through the public involvement process and review of the EA were considered in this decision.

The EA was prepared in compliance with the National Environmental Policy Act (NEPA), which considers the effects of federal, federally-funded, and/or federally-permitted projects on the quality of the human and natural environment. The DC is the federal lead agency for NEPA compliance. In addition to NEPA compliance, AEA with support from their consultant HDL, will complete the project design, issue a construction contract, and administer construction.

Selected Alternative

The AEA, in cooperation with the DC, is proposing to replace and relocate the Askinuk Corporation's bulk fuel storage facility (tank farm) in Scammon Bay, Alaska. The Askinuk Corporation is the only fuel retailer in the community that owns and operates the community's existing tank farm. Their facilities are outdated and upgrades are required to provide a code-compliant tank farm with sufficient storage capacity to support the community's retail fuel needs.

The Selected Alternative will construct a new tank farm facility at the site of the old community landfill, approximately ½ mile east of the existing tank farm facility. The Selected Alternative, described in the EA as the Proposed Action, meets the purpose and need for the project by providing a code-compliant tank farm with sufficient storage capacity to support the community's retail fuel needs and mitigating both the risk of a significant spill event and the potential hazards to sensitive coastal habitats.

Fill material for the project has been made available from an existing road-accessible quarry owned by the Askinuk Corporation, approximately one mile southeast of the proposed tank farm site. Fill material is required to ensure adequate support of coverage over the decommissioned landfill. Majority of fill will be placed over existing landfill cap. No excavation is anticipated.

The existing tank farm, marine header, and pipeline will be decommissioned. The existing tank farm is located entirely above ground, is comprised of several bulk fuel tanks, and associated piping material. A marine header and pipeline also exists and is used to transfer fuel during barge resupply events to the existing tank farm. The marine header and pipeline are located on the surface of the ground. The contractor is required to clean and cut up the tanks and piping material. All decommissioned material will be stored at the existing tank farm site. Significant ground disturbance at this site is not anticipated.

Environmental Consequences of the Selected Alternative

The EA analyzed the effects of the Selected Alternative on numerous resources, including the following: cultural resources; land use, zoning, and development; wetlands and other waters of the U.S.; wildlife; vegetation; threatened and endangered species; hazardous waste; solid waste; visual impacts; noise; socioeconomics and environmental justice; public health and safety; and cumulative effects for all of these resources.

No significant impacts to these resources were identified. These findings are based on the evidence and conclusions set forth in the EA, which is incorporated by reference.

Basis for Decision

The Selected Alternative meets the purpose and need for the project because it will provide a code-compliant tank farm that mitigates both the risk of a significant spill event and potential hazards to sensitive coastal habitats.

The Selected Alternative, in combination with the environmental commitments described in Chapter 3 of the EA, will not result in significant impacts on the environment.

Public Involvement

AEA engaged resource and regulatory agencies, nearby tribal governments, and the general public to provide information and solicit input on the purpose and need for the project, potential alternatives, and possible issues to address during the environmental review and design stages of the project. Chapter 4 of the EA provides a summary of the project's public, agency, and tribal outreach activities that were conducted prior to release of the EA.

Permits and Approvals

The following permits and approvals would likely be required prior to construction of the Proposed Action:

- Alaska Department of Environmental Conservation (ADEC) Construction General Permit for Storm Water Discharges for Large and Small Construction Activities (Clean Water Act [CWA] Section 402).
- ADEC Water Quality Certification for discharge into waters of the U.S., including wetlands (CWA Section 401).
- Alaska Department of Natural Resources Alaska State Historic Preservation Office (National Historic Preservation Act Section 106)
- U.S. Fish and Wildlife Service Letter of Concurrence (Endangered Species Act Section 7).
- U.S. Army Corps of Engineers, Wetlands Permit for placement of fill or dredged material into waters of the U.S., including wetlands (CWA Section 404).

Approved By:

_____ _____

[Name, Title] Date

Scammon Bay
Bulk Fuel Upgrades

Environmental Assessment

November 2021

Prepared For:
Alaska Energy Authority
and
Denali Commission

Prepared By:
HDL Engineering Consultants, LLC.

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List of Acronyms

ADCCED ..... Alaska Department of Commerce, Community and Economic Development
ADEC ..... Alaska Department of Environmental Conservation
ADF&G ..... Alaska Department of Fish & Game
ADOL ..... Alaska Department of Labor and Workforce Development
ADNR ..... Alaska Department of Natural Resources
AEA ..... Alaska Energy Authority
AHRS ..... Alaska Heritage Resource Survey
APE ..... Area of Potential Effect
AVEC ..... Alaska Village Electric Cooperative
BIA ..... Bureau of Indian Affairs
BMPs ..... Best Management Practices
CDR ..... Concept Design Report
CFR ..... Code of Federal Regulations
CWA ..... Clean Water Act
DC ..... Denali Commission
EA ..... Environmental Assessment
EJ ..... Environmental Justice
EO ..... Executive Orders
EPA ..... Environmental Protection Agency
HDL ..... HDL Engineering Consultants, LLC
IPaC ..... Information for Planning and Consultation
NATA ..... National Scale Air Toxics Assessment
NEPA ..... National Environmental Policy Act
NHPA ..... National Historic Preservation Act
NLURA ..... Northern Land Use Research Alaska, LLC
NOAA ..... National Oceanic and Atmospheric Administration
NRHP ..... National Register of Historic Places
NVSB ..... Native Village of Scammon Bay
PM ..... Particulate Matter
PQI ..... Professionally Qualified Individual
SHPO ..... State Historic Preservation Officer
SPCC ..... Spill Prevention Control and Countermeasure
U.S. ..... United States
USACE ..... U.S. Army Corps of Engineers
U.S.C. ..... United States Code
USFWS ..... U.S. Fish and Wildlife Service

Executive Summary

The Alaska Energy Authority, in cooperation with the Denali Commission, is proposing to replace and relocate the Askinuk Corporation's bulk fuel storage facility (tank farm) in Scammon Bay, Alaska. The proposed project will construct a new tank farm facility at the site of the old community landfill, approximately ½ mile east of the existing facility. The new facility includes the following components:

- Three 27,000-gallon diesel bulk fuel tanks
- Four 27,000-gallon gasoline bulk fuel tanks
- One 12,000-gallon dual product dispensing tank
- On-grade secondary containment structure with earthen/gravel berm
- Gravel pad foundation
- Dual product vehicle dispenser
- Small retail sales building
- Bulk fuel transfer station with fuel spill containment sump
- Bulk fuel transfer and vehicle dispensing distribution piping

Purpose and Need

The purpose of the project is to provide a code-compliant tank farm that mitigates both the risk of a significant spill event and potential hazards to sensitive coastal habitats. The Askinuk Corporation's existing tank farm is the sole retail fuel sales facility in the community. The existing facility is in poor condition, has inadequate containment, is located in the floodplain, and is threatened by ice flows on a yearly basis. The tanks, pumps, and piping are beyond their useful life and are severely corroded. The facility is not code-compliant and is a high risk for a fuel spill. A spill from a ruptured tank could overtop damaged and settled sections of the secondary containment walls, allowing fuel to reach navigable waters of the U.S., detrimentally impacting sensitive coastal wildlife habitat.

Alternatives

Project alternatives include the No Action and Proposed Action. The No Action alternative does not meet the purpose and need of the project because the existing farm does not meet the community's retail fuel needs and does not mitigate the risk of a major spill event and potential hazards to sensitive costal habitat. The Proposed Action alternative results in temporary and negligible impacts to environmental resource categories including Cultural Resources; Land Use, Zoning, and Development; Wetlands and Other Waters of the U.S.; Wildlife; Vegetation; Threatened & Endangered Species; Hazardous Waste; Solid Waste; Visual Impacts; Noise; Socioeconomic Impacts and Environmental Justice; and Public Health and Safety. Significant direct, indirect, and cumulative impacts to these resource categories are not anticipated.

Funding

The Proposed Action alternative will use funds administered by the Alaska Energy Authority and is funded by the Denali Commission. This Environmental Assessment reviews and analyzes the potential impacts of the Proposed Action and the No Action alternatives under the National Environmental Policy Act.

1.0 Purpose of and Need for Action

1.1 Introduction and Summary of the Proposed Action

The Alaska Energy Authority (AEA), in cooperation with the Denali Commission (DC), is proposing to replace and relocate the Askinuk Corporation's bulk fuel storage facility (tank farm) in Scammon Bay, Alaska (Section 10 , Township 20 North, Range 90 West, Seward Meridian; on USGS Quadrangle Hooper Bay D-2) (Figure 1-1). Askinuk Corporation is the only fuel retailer in the community that owns and operates the community's existing tank farm. Their facilities are outdated and upgrades are required to provide a code-compliant tank farm with sufficient storage capacity to support the community's retail fuel needs.

This Environmental Assessment (EA) describes two alternatives, the No Action alternative and the Proposed Action alternative, and presents an environmental impact analysis in accordance with the National Environmental Policy Act (NEPA). The Proposed Action alternative will be federally funded through the DC. Further discussion of project alternatives are discussed in Section 2.2.

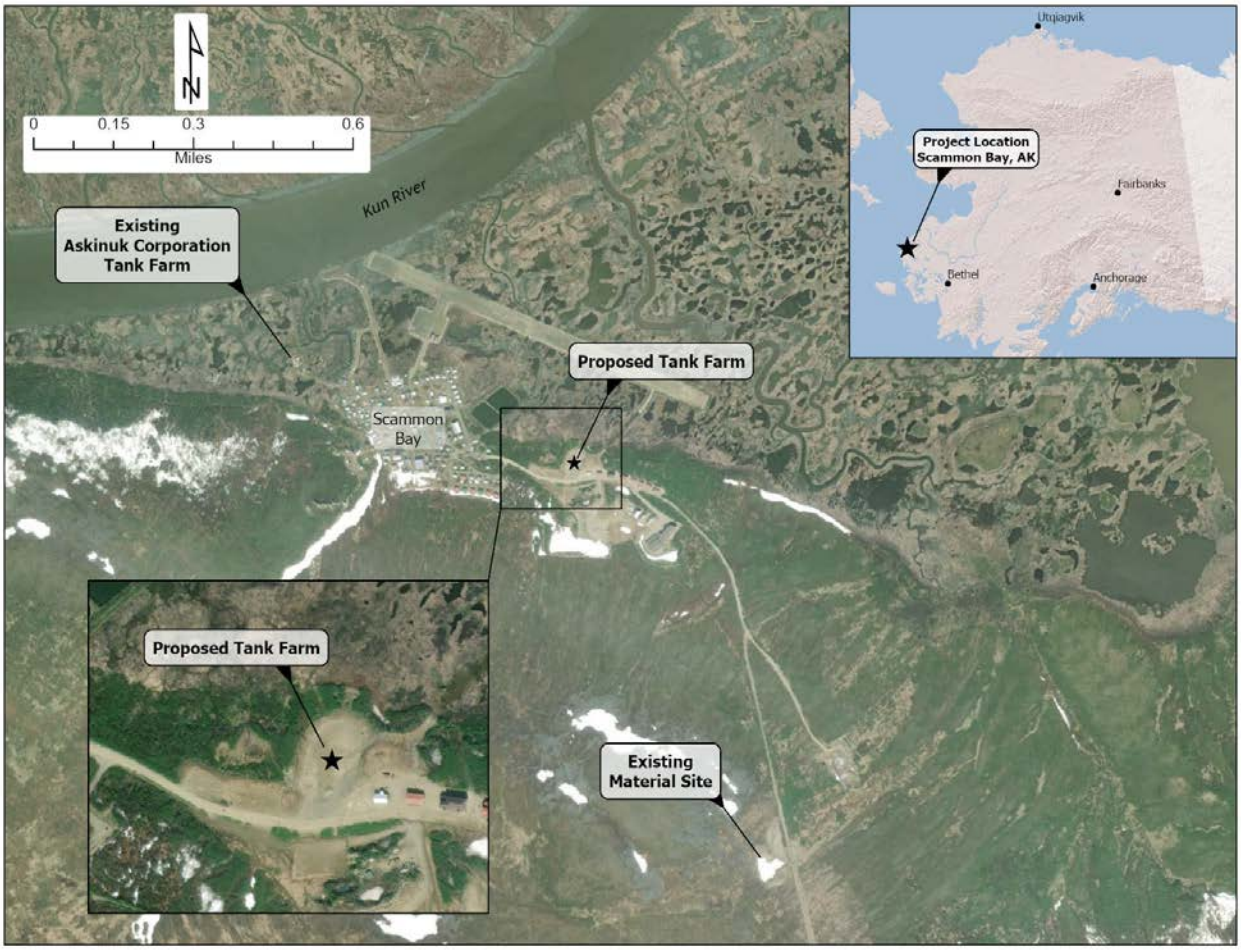


Figure 1-1. Location and Vicinity Map

1.2 Purpose of the Project

The purpose of the project is to provide a code-compliant tank farm that mitigates both the risk of a significant spill event and potential hazards to sensitive coastal habitats.

1.3 Need for the Project

The Askinuk Corporation's existing tank farm is the sole retail fuel sales facility in the community. The facility is in poor condition, has inadequate containment, is located in the floodplain, and is threatened by ice flows on a yearly basis. The tanks, pumps, and piping are beyond their useful life and are severely corroded. The facility is not code-compliant and poses a high risk for a fuel spill. A spill from a ruptured tank could overtop damaged and settled sections of the secondary containment walls, allowing fuel to reach navigable waters of the U.S., detrimentally impacting sensitive coastal wildlife habitat.

1.4 Relevant Laws and Regulations

The Proposed Action's NEPA compliance is subject to several regulations, laws, and Executive Orders (EO). Table 1-1 summarizes the key applicable regulations and responsibilities of the agency to ensure compliance with listed regulatory requirements.

Table 1-1. Summary of Compliance Regulations and Agency Responsibilities

Compliance Regulation	Agency Responsibilities
National Historic Preservation Act (54 United States Code [U.S.C.] 300101 et seq., specifically 54 U.S.C. 306108)	The head of any federal agency having direct or indirect jurisdiction of a proposed federal or federally assisted undertaking…prior to the approval of expenditure of any federal funds on the undertaking or prior to the issuance of any license, shall take into account the effect of the undertaking on any historic property. The head of the federal agency shall afford the Council a reasonable opportunity to comment with regard to the undertaking. If necessary, the agency may conduct field evaluations to determine the impact of a project on historic properties or National Register of Historic Places (NRHP)-eligible properties within the Area of Potential Effect (APE), and mitigating measures may be required to manage the effects of the project on historic properties.
Section 106 of National Historic Preservation Act (16 U.S.C. §470f), and implementing regulations 36 Code of Federal Regulations [CFR] §800	Consult with affected tribal entities and the State Historic Preservation Officer (SHPO) regarding historic properties and potential impacts of the Proposed Action.
Clean Air Act (42 U.S.C. §7401 -7626)	Evaluate potential impacts to air quality as a result of the Proposed Action.
Clean Water Act (CWA) (P.L. 92-500, 33 U.S.C. §1251 et seq., as amended)	Use best management practices (BMPs) to control stormwater discharges during construction of the Proposed Action.

	Identify potential impacts that may result in the discharge of dredged or fill material into waters of the U.S., including wetlands.
Comprehensive Environmental Response, Compensation, and Liability Act (42 U.S.C. §9601 et seq.)	Identify potential for presence of hazardous material contamination, and disturbance by the Proposed Action.
Endangered Species Act (16 U.S.C. §1531)	Determine if the Proposed Action will affect listed fish, wildlife, plants, or habitats. Consult with the U.S. Fish and Wildlife Service (USFWS) as needed.
Bald and Golden Eagle Protection Act (16 U.S.C. § 668 et seq)	Determine if the Proposed Action will affect Bald or Golden Eagles within the vicinity of the project area. Consult with the USFWS as needed.
Fish and Wildlife Coordination Act (16 U.S.C. §661 -667e, as amended)	Identify potential project impacts of the Proposed Action to Waters of the U.S., and consult with USFWS as needed.
Migratory Bird Treaty Act (16 U.S.C. §703-71 1, as amended)	Evaluate potential impacts of the Proposed Action on migratory bird species in construction and operation phases of the Proposed Action.
Noise Control Act (42 U.S.C. §4901 - 4918)	Ensure the Proposed Action does not contribute to noise pollution in the vicinity of the project area.
Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq.)	Evaluate the potential of the Proposed Action to generate contamination or hazardous waste, and implement control and minimization measures.
EO 11988: Floodplain Management	Identify and address potential floodplain impacts from the Proposed Action.
EO 11990: Protection of Wetlands	Limit impacts to wetlands and preserve the quality and value of wetlands within the vicinity of the project area.
EO 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations	Evaluate potential disproportionate adverse health or environmental effects of the Proposed Action on minority and low-income populations.
EO 13112: Invasive Species	Ensure the Proposed Action does not contribute to the spread or distribution of invasive species.

2.0 Alternative Development and Identification

2.1 Summary of Previously Completed Studies

The AEA has conducted several assessments over the past 15 years that identify options for bulk fuel storage and assessment of existing facilities within the community. Recent studies conclude that the Askinuk Corporation's tank farm needs to be replaced. A summary outlining the community's tank farm storage options are listed below;

- **2015 Bulk Fuel Assessment Report** – CRW Engineering identified several bulk fuel facilities within the Scammon Bay community. The Askinuk Corporation's existing tank farm had several deficiencies that included severely dented tanks with deep pitting, leaking fuel, and reduced secondary containment capacity. CRW Engineering recommended replacing Askinuk Corporation's existing tank farm.

- **2017 Bulk Fuel Letter Report** – LeMay Engineering & Consulting, Inc. was retained to develop bulk fuel upgrade alternatives and cost estimates. The report noted that the Askinuk Corporation's existing tank farm has no secondary containment system to prevent a catastrophic failure. LeMay Engineering & Consulting, Inc. recommended construction of a new code-compliant bulk fuel tank farm as well as improvements to the distribution header, associated fuel lines, and the retail dispenser.

- **2020 Conceptual Design Report** – HDL Engineering Consultants, LLC (HDL) developed and evaluated options for a bulk fuel storage upgrade project for replacement of the Askinuk Corporation's existing tank farm. A site visit was completed on June 29, 2020, to gather information to support the preparation of a Concept Design Report (CDR).

Copies of these documents are available upon request from AEA.

2.2 Alternative Development and Environmental Design Criteria

Based on previous and current studies, relevant design criteria, and community input, AEA presented the Native Village of Sammon Bay (NVSB) and the Askinuk Corporation with three preliminary site alternatives for the new tank farm during the concept design phase of the project. These included (Figure 2-1):

- Site 1 – Hill Site located west of the village and approximately 400 feet south of the Askinuk Corporation's existing tank farm.
- Site 2 – Alaska Village Electric Cooperative (AVEC) Site located immediately adjacent to and north of the existing AVEC tank farm.
- Site 3 – Landfill Site located on the gravel pad covering the old community landfill.



Figure 2-1. Site Selection Alternatives

Site selection alternatives were based on concept-level engineering analyses conducted on cost effectiveness, constructability, and operability. Site 3 was selected as the recommended site for tank farm construction because it is located on land owned by the Askinuk Corporation; it minimizes threats from flooding, erosion, and ice damage; minimizes construction cost; and provides greater ease of maintenance and operation. A copy of the site selection memorandum is included in Appendix A.

2.3 Alternatives

The final alternatives developed and evaluated under this EA include the No Action alternative and the Proposed Action alternative. Preliminary tank farm location alternatives were previously analyzed and discussed in the CDR. NEPA regulations require consideration of the No Action alternative to provide a benchmark to compare the Proposed Action's environmental effects. The AEA developed and evaluated the Proposed Action for its ability to meet the project's stated purpose and need.

2.3.1 No Action Alternative

Under the No Action alternative construction of a new tank farm would not occur. The Askinuk Corporation would continue using the existing tank farm to operate and supply the community with retail sales of diesel and gasoline. Due to the aging infrastructure, there is an increased likelihood of a significant spill event. A significant spill event would impact sensitive environmental resources, community drinking water, and impact the community's reliable access

to retail fuel. The No Action alternative does not meet the proposed project's purpose and need. The No Action alternative creates environmental, economic, and social uncertainty for the Scammon Bay community.

2.3.2 Proposed Action Alternative

The Proposed Action would construct a new tank farm facility at the site of the old community landfill, approximately ½ mile east of the existing tank farm facility. The new facility includes the following components (Figure 2-2):

- Three 27,000-gallon diesel bulk fuel tanks
- Four 27,000-gallon gasoline bulk fuel tanks
- One 12,000-gallon dual product dispensing tank
- On-grade secondary containment structure with earthen/gravel berm
- Gravel pad foundation
- Dual product vehicle dispenser
- Small retail sales building
- Bulk fuel truck transfer station with fuel spill containment sump
- Bulk fuel transfer and vehicle dispensing distribution piping

Fill material for the project has been made available from a road-accessible quarry owned by the Askinuk Corporation, approximately one mile southeast of the proposed tank farm site. Staging for the proposed project will occur on the existing gravel pad associated with the community landfill.

The existing tank farm, marine header, and pipeline will be decommissioned. The existing tank farm is located entirely above ground, is comprised of several bulk fuel tanks, and associated piping material. A marine header and pipeline also exists and is used to transfer fuel during barge resupply events to the existing tank farm. The marine header and pipeline are located on the surface of the ground. The contractor is required to clean and cut up the tanks and piping material. All decommissioned material will be stored at the existing tank farm site and in a manner where the material will be inoperable and incapable of storing and dispensing fuel. Permanent impacts to the ground surface are not anticipated.

The Proposed Action alternative meets the project purpose and need by providing a code-compliant tank farm with sufficient storage capacity to support the community's retail fuel needs and mitigating both the risk of a significant spill event and the potential hazards to sensitive coastal habitats.

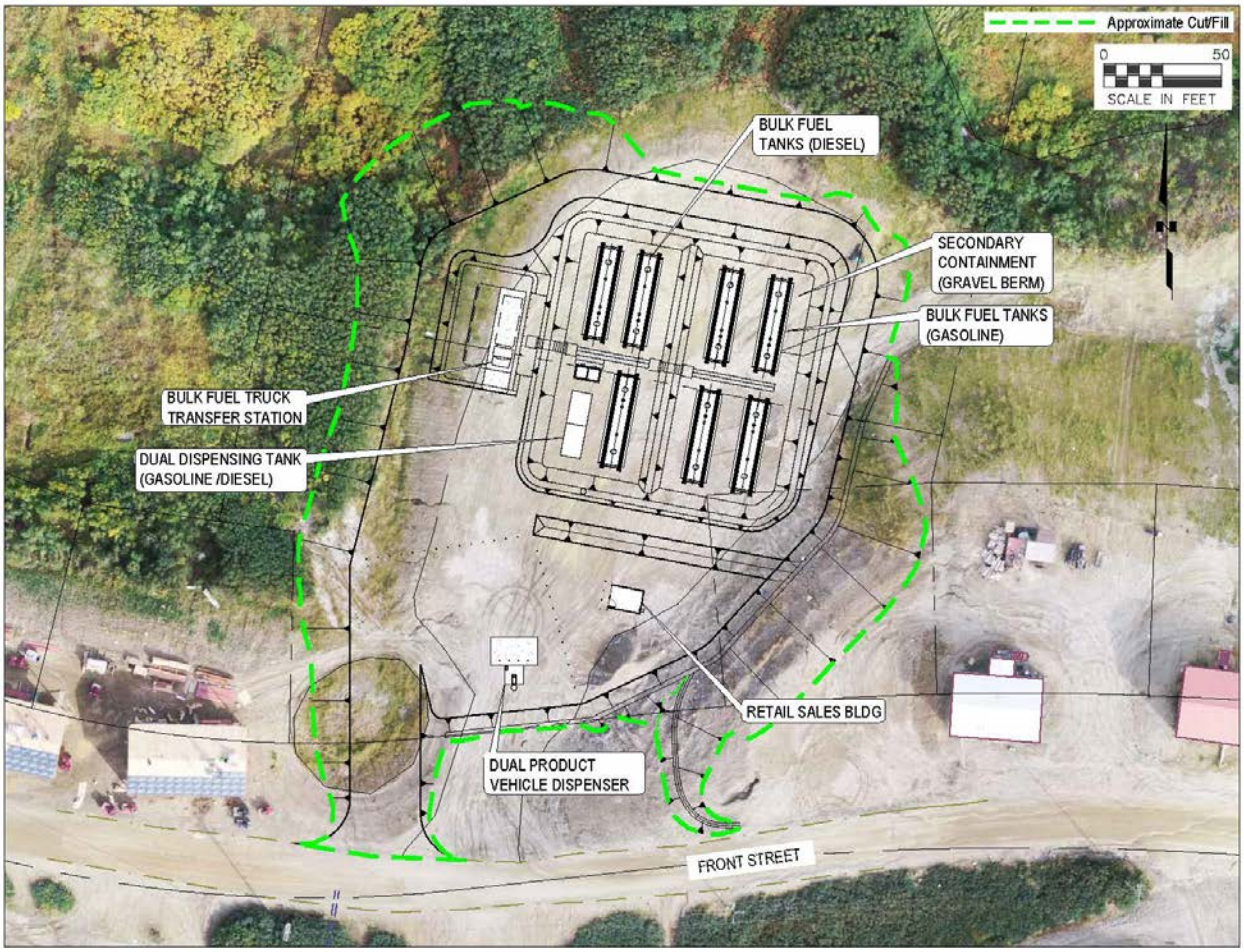


Figure 2-2. Proposed Action

3.0 Affected Environment and Environmental Consequences

The purpose of the environmental impact analysis in this chapter is to determine whether potential impacts of the Proposed Action will significantly affect the human environment, as defined under the Council on Environmental Quality's NEPA Implementing Regulations (Title 40 CFR 1508.1(m). The analysis includes descriptions of environmental resources present in the project area or vicinity (i.e., the affected environment) and the anticipated impacts to those resources resulting from the project's alternatives (i.e., environmental consequences). Further, the analysis is issues-based; the analysis discusses resources relevant to the project site or project area in detail than those that are not identifiable or not measurable.

The project site is defined as the direct project footprint where the proposed Action Alternative will take place. The project area is defined as secondary sites where other supporting aspects of the project will occur. These secondary sites include the barge landing, removal of the marine header and pipeline, decommissioning of the existing tank farm, material site, and haul routes used to transport building materials, construction equipment, and fuel. The project vicinity is defined as a 1-mile buffer surrounding the project site (Figure 3-1).

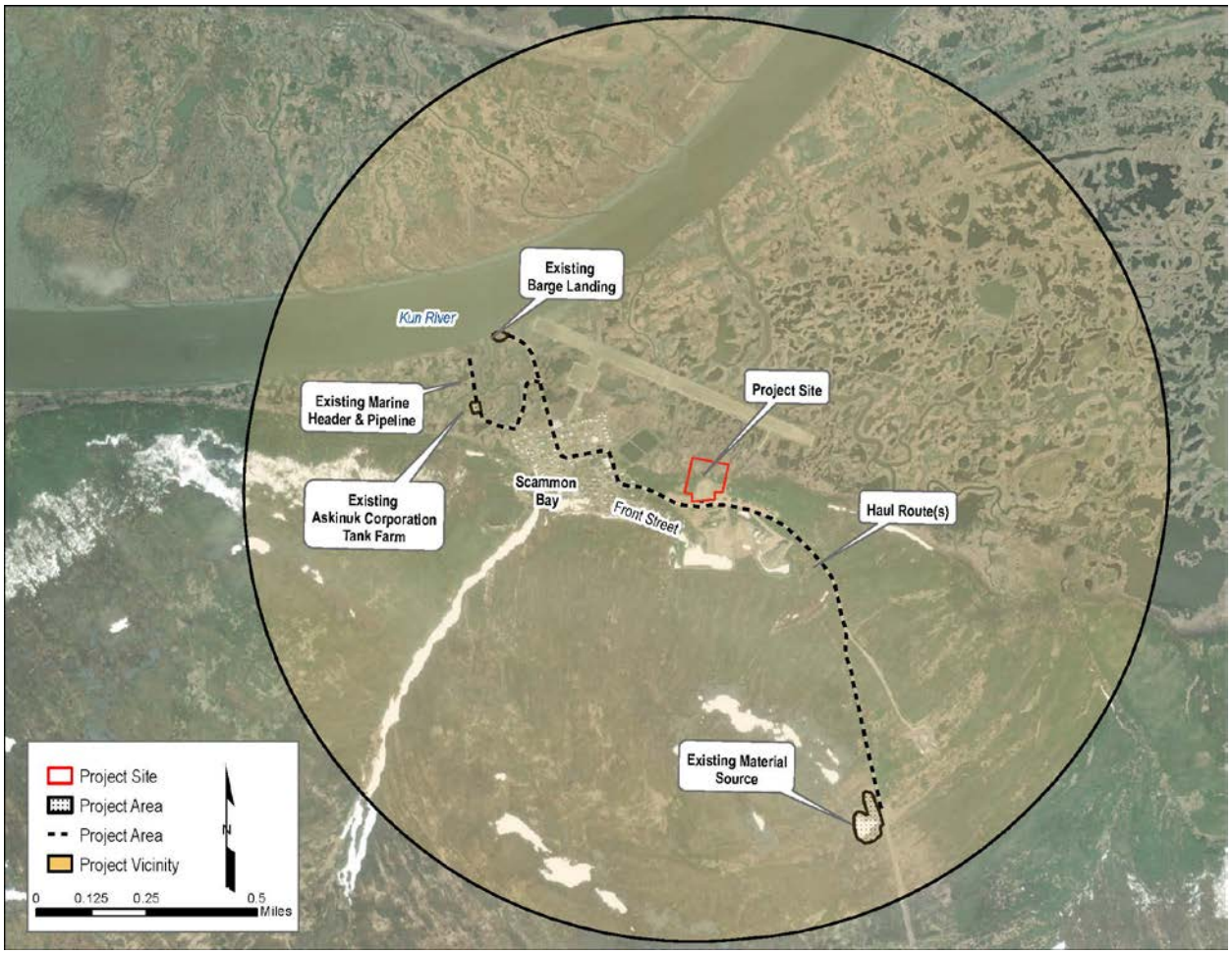


Figure 3-1. Project Site, Area, and Vicinity Map

This section provides a description of environmental resources present in the vicinity of the project area, discloses the anticipated impacts to those resources as a result of the project's alternatives, and identifies proposed environmental commitments to avoid or minimize impacts. The selection of environmental resources discussed in terms of their affected environment, environmental consequences, and mitigation measures is issues-based.

This section discusses 12 environmental impact categories (i.e., resources) determined relevant to the project based on environmental field studies, research, and input received during the public and agency scoping process conducted for this EA. Section 3.1 lists 13 additional categories determined to be non-issues.

3.1 Non-Relevant Resources Eliminated from Further Review & Environmental Impact Categories Not Present in Project Area

Environmental impact categories are not relevant to the project if the resource is not present in the project area or if there is no potential for the Proposed Action to result in a measurable impact. The following categories are not relevant to the project. Appendix B contains brief resource descriptions for these categories.

- Air Quality
- Fisheries
- Waterbodies
- Recreational Resources
- Wild and Scenic Rivers
- Coastal Barriers
- Coastal Zone
- Floodplains and Regulatory Floodway
- Prime and Unique Farmland
- Soils and Geological Resources
- Invasive Species
- Climate Change
- Transportation

3.2 Cultural Resources

3.2.1 Affected Environment

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of their actions on significant cultural resources. Cultural resource identification, evaluation, and Section 106 review have been conducted in accordance with the requirements of Section 106 of the NHPA and 36 CFR 800.

Northern Land Use Research Alaska, LLC (NLURA) conducted an office-based cultural resources review in October 2020. NLURA reviewed the Alaska Heritage Resource Survey (AHRS) database, the NRHP database, as well as available cultural resources survey reports and consultation documents to identify cultural resources and historic properties located in a predetermined Study Area. NLURA determined their Study Area include a 3-mile buffer around a central point relative to the originally proposed site alternatives for the new tank farm. NLURA identified six AHRS sites and one Revised Statute 2477 Trail within the study area. The AHRS database also indicated that 11 previous cultural resources investigations have been conduction within the project Study Area. Due to the sensitive nature of cultural resources, specific locations and graphics have been withheld but are available upon request.

3.2.2 Environmental Consequences - No Action Alternative

The No-Action alternative would not undertake any improvements and would not directly or indirectly affect any cultural resources within the project area.

3.2.3 Environmental Consequences - Proposed Action Alternative

During Section 106 Consultation, the APE was defined further once the location of the proposed Action Alternative was determined. The project's direct APE consisted of the proposed Action Alternative's disturbance footprint at the old community landfill (Figure 3-2.). The APE for indirect effects extends to properties adjacent to the project site, existing tank farm, barge landing site, marine header, material source, and haul routes (Figure 3-3).

The cultural resources survey indicated there is a very low probability of encountering unknown, intact resources during construction of the Proposed Action since there are no known sites within the APE. There are no anticipated effects on built environment because no historic-age buildings are present in the APE.

HDL, on behalf of AEA and DC, consulted with the Alaska SHPO and other consulting parties under Section 106 of the NHPA regarding the project's effect on cultural resources. The Alaska SHPO concurred with the finding of no historic properties affected on July 6, 2021. See Appendix C for Section 106 consultation documentation.

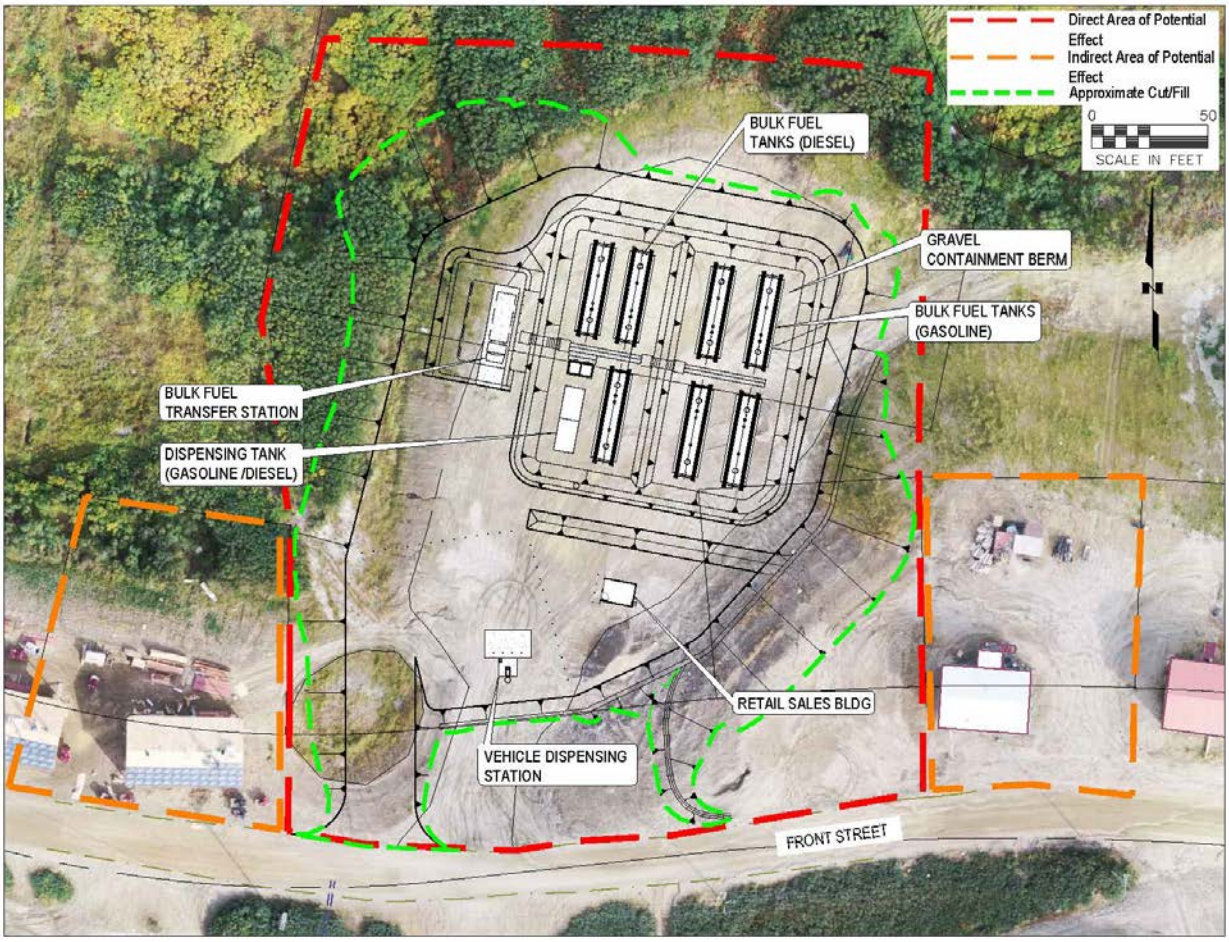


Figure 3-2. Area of Potential Effect

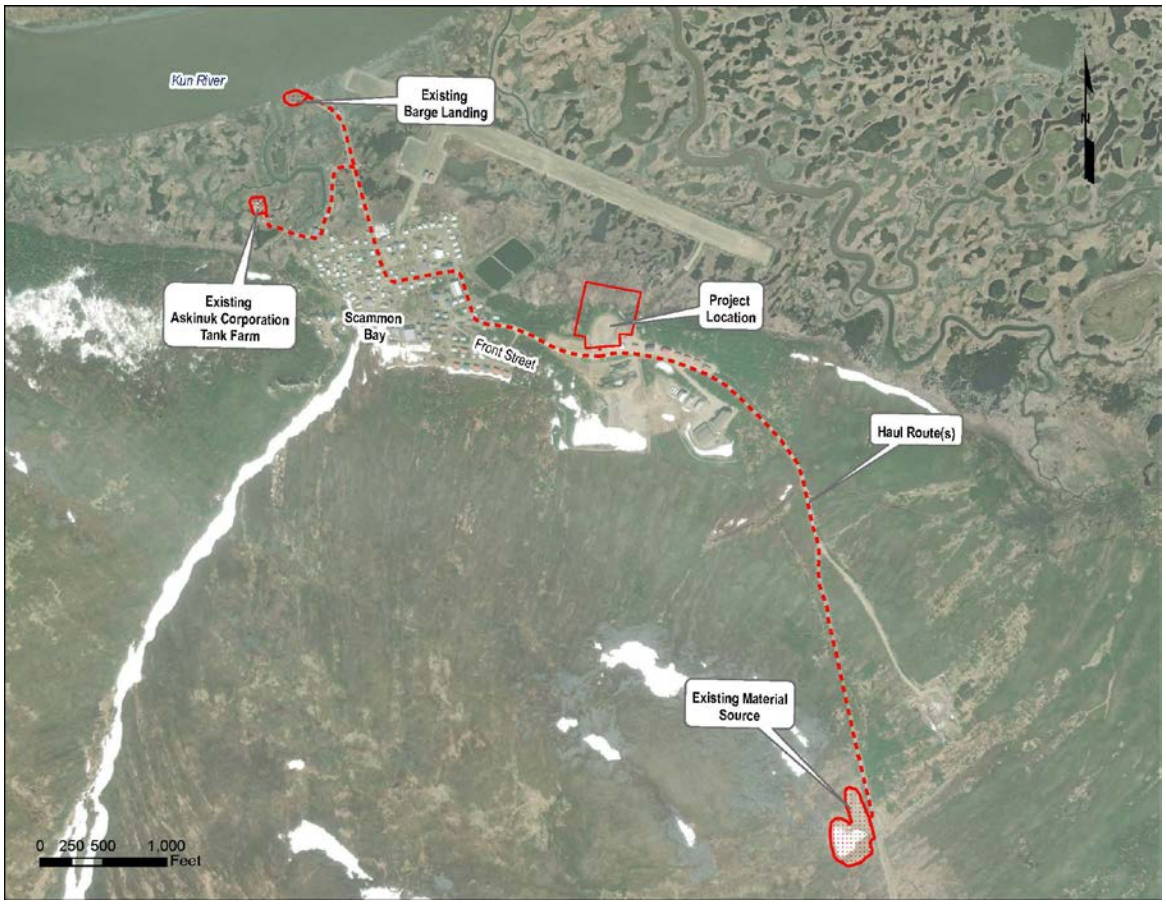


Figure 3-3. Indirect Area of Potential Effect

Environmental Commitments

If cultural, archaeological, or historic resources are discovered during project construction, all work that may impact these resources will stop until AEA and DC consults SHPO to determine the appropriate corrective action.

3.3 Land Use, Zoning, and Development

3.3.1 Affected Environment

Land use, zoning, and development are guided by the NVSB, the City of Scammon Bay, and Askinuk Corporation. They represent the tribal, municipal, and corporate entities within the community and informally participate and guide land use in the community. Currently, the city has no formal land use code or zoning. Land use surrounding the proposed project site consists of private residential development and undeveloped land. Across the street from the project site are large cut slopes where excavation has previously taken place with the area being used for industrial use.

The proposed site is currently located on land owned by the Askinuk Corporation. A portion of the site lies within a Waste Disposal Site Right-of-Way Easement Parcel granted to the City in

1987 for the purpose of construction, maintenance, and ongoing management of a waste disposal site (Figure 3-4). Since that time, the property was used for a landfill until the site was closed and capped.

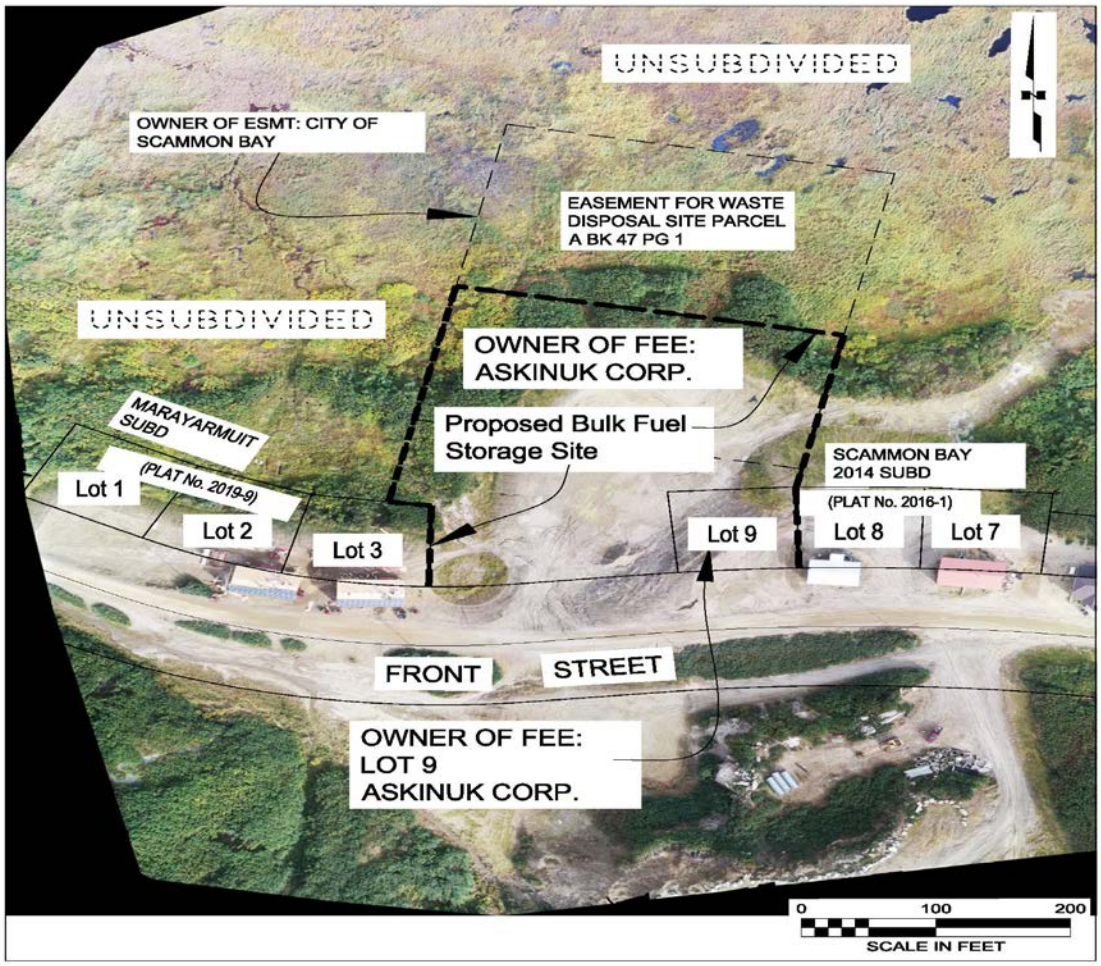


Figure 3-4. Land Ownership

3.3.2 Environmental Consequences - No Action Alternative

The No Action alternative is not consistent with the goals set forth by AEA, DC, or the local community. The No Action alternative would not provide an adequate location for a new code compliant community tank farm nor meet the need for a retail fuel facility in the community. Continued use of the existing site, even with construction of new tank farm would still result in an increased risk of fuel spills and equipment failure due to seasonal flooding and ice jams.

3.3.3 Environmental Consequences - Proposed Action Alternative

In support of the Proposed Action alternative, the NVSB, through a resolution of the Scammon Bay Traditional Council, agreed to receive facility ownership of the new tank farm. The Askinuk Corporation and the City of Scammon Bay intend to transfer a property interest of the proposed site to NVSB. The Askinuk Corporation will maintain operational control of the facility through an agreement with NVSB.

The proposed tank farm is located adjacent to properties that have recently been developed for residential use (Figure 3-2). Adverse impacts to land use and development of the area is negligible because there is no change in the existing 'type' of use at the site. The proposed use at the site is suitable for redevelopment of another industrial use (i.e. tank farm) compared to residential development due to the potential for encountering buried waste (HDL 2020).

The proposed tank farm would primarily be constructed within existing ground disturbance limits on an existing gravel pad that caps the old community landfill. Additional fill is required to provide an adequate pad foundation for the tanks and some expansion of the existing pad is required however, the majority of the proposed improvements are located on the landfill cap.

3.4 Wetlands and other Waters of the U.S.

3.4.1 Affected Environment

There are no navigable waters or other waterbodies located in the project area; however; wetlands are present within the project area (Figure 3-5). Field data was collected in June 2020 and a wetland delineation report was completed in December 2020. Emergent wetland habitats were found in the undeveloped areas surrounding the landfill embankment. These wetlands range in moisture regime from moderate to wet marshes and contain primarily herbaceous vegetation. Vegetative species found dominating wetland habitat adjacent to the project footprint consisted of Northwest Territory sedge (*Carex utriculata*), leafy tussock sedge (*Carex aquatilis*), and marsh cinquefoil (*Comarum palustre*). These habitats exhibited standing water anywhere from 1-6 inches in depth. A copy of the Wetland Delineation is located in Appendix D.

3.4.2 Environmental Consequences - No Action Alternative

The No Action alternative would not have a direct impact on wetland resources; however, continued use of the existing tank farm facility increases the likelihood of a significant spill event. A significant spill event has the potential to adversely impact wetlands surrounding the existing tank farm.

3.4.3 Environmental Consequences – Proposed Action Alternative

Construction of the Proposed Action alternative requires minor expansion of the existing gravel pad. This expansion is to ensure adequate cover of the existing landfill cap as well as supporting side slopes. Wetland impacts are anticipated to be less than $1/10^{th}$ of an acre and involve the placement of 430 cubic yards of fill material within the wetlands. Due to the small impact area and prevalence of wetlands in the area, these impacts to wetlands are considered negligible.

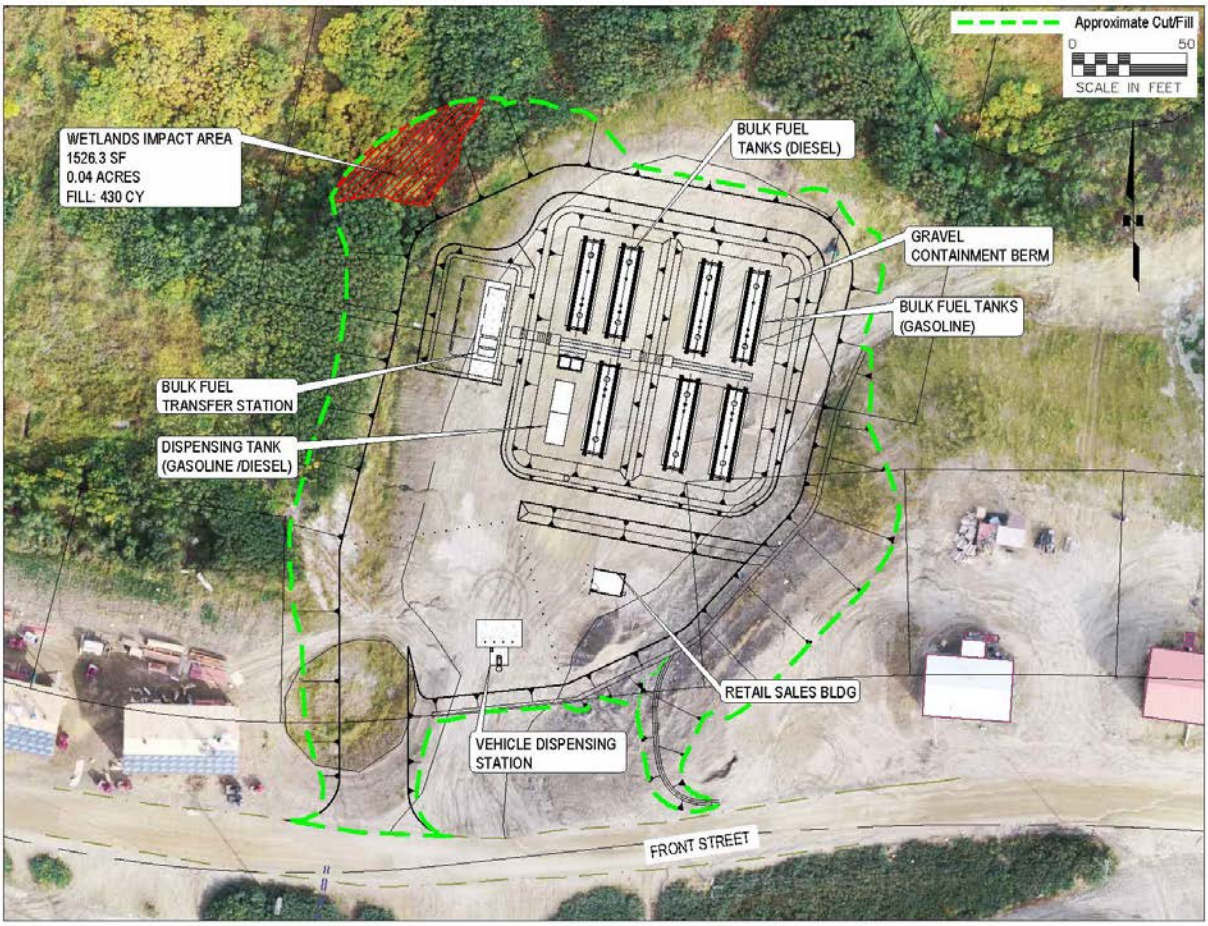


Figure 3-5. Wetland Impacts

Avoidance, Minimization, and Mitigation

Although potential wetland impacts are not completely avoidable, impacts to wetlands have been minimized by proposing to construct the facility in disturbed uplands on an existing gravel pad. Minor expansion of the existing gravel pad is required to thicken the surface of the gravel pad (as needed) to ensure adequate construction of side slopes to support a new tank farm. In addition, the proposed site is furthest away from the river compared to the other alternatives and is not threatened by ice, storms, flooding or erosion (HDL 2020).

To minimize the risk of hazardous leaks and spills affecting wetlands, the project will implement the following measures:

- The contractor will use BMPs, including minimization of soil disturbance during construction, to control erosion and sedimentation.
- The existing Spill Prevention Control and Countermeasure Plan (SPCC), Facilities Response Plan, and approved Marine Transfer Operations Plan for the community's tank farm will be updated.
- Monitoring of all fuel transfers by a City of Scammon Bay employee at the tank farm and by the barge operator at the barge off loading site.

No compensatory mitigation is being proposed however, consultation with the U.S. Army Corps of Engineers (USACE) to obtain a Nationwide Permit under Section 404 of the CWA will be completed prior to construction. The Proposed Action's unavoidable wetland impacts are offset by the beneficial impacts of removing the threat of a spill from the existing tank farm.

3.5 Wildlife

3.5.1 Affected Environment

Wildlife

Common terrestrial mammals that may inhabit the area include brown bears (*Ursus arctos*), red fox (*Vulpes vulpes*), lynx (*Lynx canadensis*), porcupines (*Erethizon dorsatum*), weasels (*mustela* spp.), and hares (*Lepus* spp.).

Resident & Migratory Birds

Many resident and migratory bird species inhabit or migrate through the study area such as gull species (*Larus* spp.), ravens and crows (*Corvus* spp.), sandhill crane (*Grus canadensis*), and Canada goose (*Branta canadensis*).

A review of the USFWS's Information for Planning and Consultation (IPaC) project planning tool did not identify any migratory birds of conservation concern that may occur in the study area (USFWS 2021).

Bald and Golden Eagles' Nest

Suitable eagle nesting habitat exists in the general project vicinity; however, none are known to be within 660 feet of the proposed work. If eagle nests are sighted within 660 feet of the project area during or prior to construction, AEA will seek guidance from the USFWS on how to proceed.

Habitat

Wildlife habitat surrounding the project area is comprised of shrub dominated coastal plains to the north and the scrub-shrub dominated Askinuk Mountains to the south. The project site is located at the base of the Askinuk Mountains and is surrounded by palustrine wetland habitats.

3.5.2 Environmental Consequences - No Action Alternative

The No Action alternative would not have a direct impact on existing wildlife resources or the affected environment, including existing habitats and ecosystems; however, continued use of the existing tank farm facility increases the likelihood of a significant spill event. A significant spill event has the potential to adversely impact wildlife species and their habitat.

3.5.3 Environmental Consequences - Proposed Action Alternative

The Proposed Action alternative is not expected to adversely affect wildlife because the majority of the proposed action is located on previously disturbed ground. Some wildlife habitat will be converted from either upland or wetland habitat to support minor expansion of the existing gravel

pad. Impacts to wildlife species are anticipated to be negligible because more suitable habitat exists outside the project area.

Long-term impacts to avian species are not anticipated as part of the proposed project. Temporary disturbance to avian species may occur from proposed vegetation clearing. However, vegetation clearing associated with the project is expected to be minimal.

Environmental Commitments

In order to reduce impacts to resident and migratory birds as well as Bald and Golden Eagles the following will occur:

- To the maximum extent practicable, construction and development of the proposed tank farm will occur on previously disturbed ground and would minimize removal of preferred vegetative habitat for wildlife species within the area.
- Disturbance to migratory bird species will be minimized by following the USFWS recommended time periods for avoiding clearing in Yukon-Kuskokwim Delta (May 5 – July 25), except as allowed by state, federal, and local laws. Additional limitations for clearing may be applicable if clearing takes place in Canada geese and swan habitat or black scoter habitat.
- The project area will be surveyed for the presence of eagles or their nests prior to construction in order to avoid impacts to nests or nesting birds. The contractor will be required to perform a survey for eagle nests prior to and during construction. If any nests are discovered within 660 feet of the project area during construction, the USFWS will be consulted for guidance on how to proceed.

3.6 Vegetation

3.6.1 Affected Environmental

Additional fill will be placed beyond the toe of slope of the existing gravel pad and will permanently reduce the amount of vegetation adjacent to the existing gravel pad at the project site. Vegetation species adjacent the existing pad include dense areas of alder (*Alunus incana*) as well as other species such as spreading wood fern (*Dryopteris expansa*), narrowleaf fireweed (*Chamaenerion angustifolium*), and Bluejoint (*Calamagrostis Canadensis*). Wetland plant species will also be permanently impacted by the placement of additional fill; however, these impacts are discussed further in Section 3.4.

Temporary impacts to vegetation will also occur during the removal of the marine header pipeline that connects the existing marine header to the existing tank farm. Heavy equipment will be used to dismantle the above ground pipeline. Minor disturbance to vegetation and topsoil may occur but will be temporary. Once the marine pipeline header has been removed, revegetation of any disturbed areas will occur naturally.

Vegetative plant species permanently impacted at the project site are commonly found throughout Alaska.

3.6.1 Environmental Consequences – No Action Alternative

The No Action alternative would not have a direct impact on vegetation resources; however, continued use of the existing tank farm facility increases the likelihood of a significant spill event. A significant spill event has the potential to adversely impact vegetation that provides habitat for a variety of species surrounding the existing tank farm.

3.6.2 Environmental Consequences – Proposed Action Alternative

Construction of the proposed Action Alternative will result in the permanent loss of 1.41 acres vegetation surrounding the project site. Improvements to the existing pad, which includes expanding the side slopes in some areas, are required in order to ensure the existing pad can adequately support construction of the new tank farm. These impacts are not anticipated to have a measurable impact on vegetation communities or the habitat they provide surrounding the project site.

Environmental Commitments

- Where feasible, disturbed areas will be re-vegetated with seed recommended for the region by the Alaska Department of Natural Resources' (ADNR) *A Revegetation Manual for Alaska*.
- Vegetation clearing will also occur during the USFWS recommended time periods for avoiding clearing in Yukon-Kuskokwim Delta (May 5 – July 25), except as allowed by state, federal, and local laws. Additional limitations for clearing may be applicable if in Canada geese and swan habitat or black scoter habitat.

3.7 Threatened and Endangered Species

3.7.1 Affected Environment

A review of the USFWS's IPaC project planning tool, Alaska Department of Fish & Game's (ADF&G) Threatened & Endangered species website, and National Oceanic and Atmospheric Administration's (NOAA) Species Distribution Mapper, on April 26, 2021, indicated that the threatened Spectacled Eider (*Somateria fischeri*) may occur in the project area (Figure 3-6) (USFWS 2021, ADF&G 2021, NOAA 2021). Spectacled Eiders forage in the coastal ocean habitat but nest in wet tundra habitat. Breeding and nesting grounds exist on the western coast of Alaska with their preferred nest sites on islands or peninsulas in lakes. Eiders travel to their breeding grounds along established migration corridors with multiple stopovers at coastal sites. There is no designated critical habitat, marine mammals, or marine habitat within the project area.

Consultation with the USFWS in accordance with Section 7 of the Endangered Species Act is required due to the potential presence of Spectacled Eiders and their habitat within the project area.

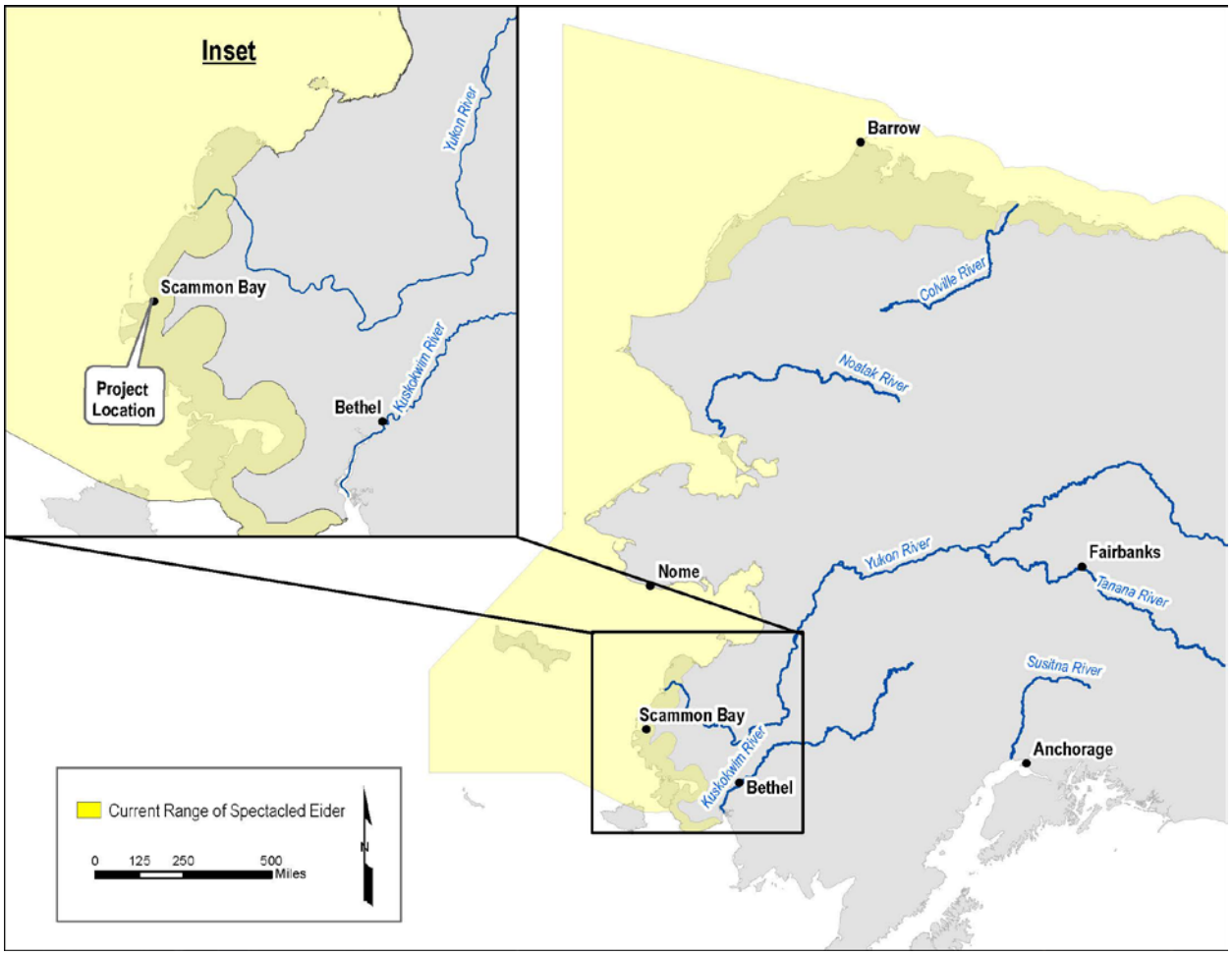


Figure 3-6. Current Range of the Spectacled Eider

3.7.2 Environmental Consequences - No Action Alternative

The No Action alternative would not have a direct impact on Spectacled Eiders or their nesting habitat; however, continued use of the existing tank farm facility increases the likelihood of a significant spill event. A significant spill event has the potential to adversely impact eider habitat that may be within the project vicinity.

3.7.3 Environmental Consequences - Proposed Action Alternative

The Proposed Action would have a direct impact on less than 1/10th of an acre of potential Eider habitat. The majority of the proposed project is located on an existing gravel pad with minimal expansion into adjacent potential Eider nesting habitat. Currently, the proposed project is located in an area surrounded by on-going residential development and aviation activity. The local airport runway is located approximately 850 feet north of the proposed tank farm. Since Eiders prefer nesting and breeding habitat that is further away from human activity they are not expected to nest adjacent to the project site.

On August 2, 2021, the USFWS concurred with AEA and DC's finding that the proposed project is not likely to adversely affect Spectacled Eiders. A copy of USFWS Section 7 consultation is located in Appendix E.

Environmental Commitments

In order to reduce impacts to Eiders the following will occur:

- The new facility will be incorporated into Scammon Bay's current SPCC plan for the existing tank farm operations. The contractor may also develop a SPCC plan for operations related to their work.
- Prior to construction, a survey of the project area will be completed to identify any Eiders or nesting sites that may exist immediately adjacent to the proposed project site.

3.8 Hazardous Waste

3.8.1 Affected Environment

A review of the Alaska Departments Environmental Conservation's (ADEC) Contaminated Sites web mapper identified two contaminated sites (Figure 3-7); one is located in the project vicinity while the second is located within the project area. The site located within the project vicinity is known as the Scammon Bay Former BIA (Bureau of Indian Affairs) School (Hazard ID 26268). This contains petroleum contamination that extends from the ground surface to at least six feet below ground surface. Remediation at the site includes removal and stockpiling of soil followed by placement of a clean soil cap to reduce exposure. On June 2019 ADEC requested a meeting with BIA to determine long-term planning at this site and many others (ADEC 2021). No ground disturbing work is anticipated to occur near this site. Impacts to this site from either the Action or No Action alternative is not anticipated because the site is located over 1,000 feet from any project related activities. No further analysis of impacts to this site has been evaluated.

The second contaminated site located within the project area is the Askinuk Corporation's existing tank farm (Hazard ID 26910). In April 2018, 7,000 gallons of gasoline were released into the secondary containment through a hole in the bottom of a 10,000-gallon above ground storage tank. A breach in the secondary containment berm resulted in a gasoline sheen being observed on the Kun River at the time of the release as well as in melt water and mud during spring breakup. ADEC collected water samples in May and July 2018 from ponded water adjacent to the area where the breach occurred and one from the unnamed creek (down-gradient of the ponded water) that flows into the Kun River. While the samples taken in May exceeded ADEC's water quality standards for petroleum contamination, the second samples taken in July did not detect any contaminates of concern. Since the site inspection in May 2018 there have been no reported observations of sheen in the surface water (wetlands or creek) adjacent to the tank farm. Impacted sand and gravel remain in the pad and within the secondary containment area (ADEC 2021).

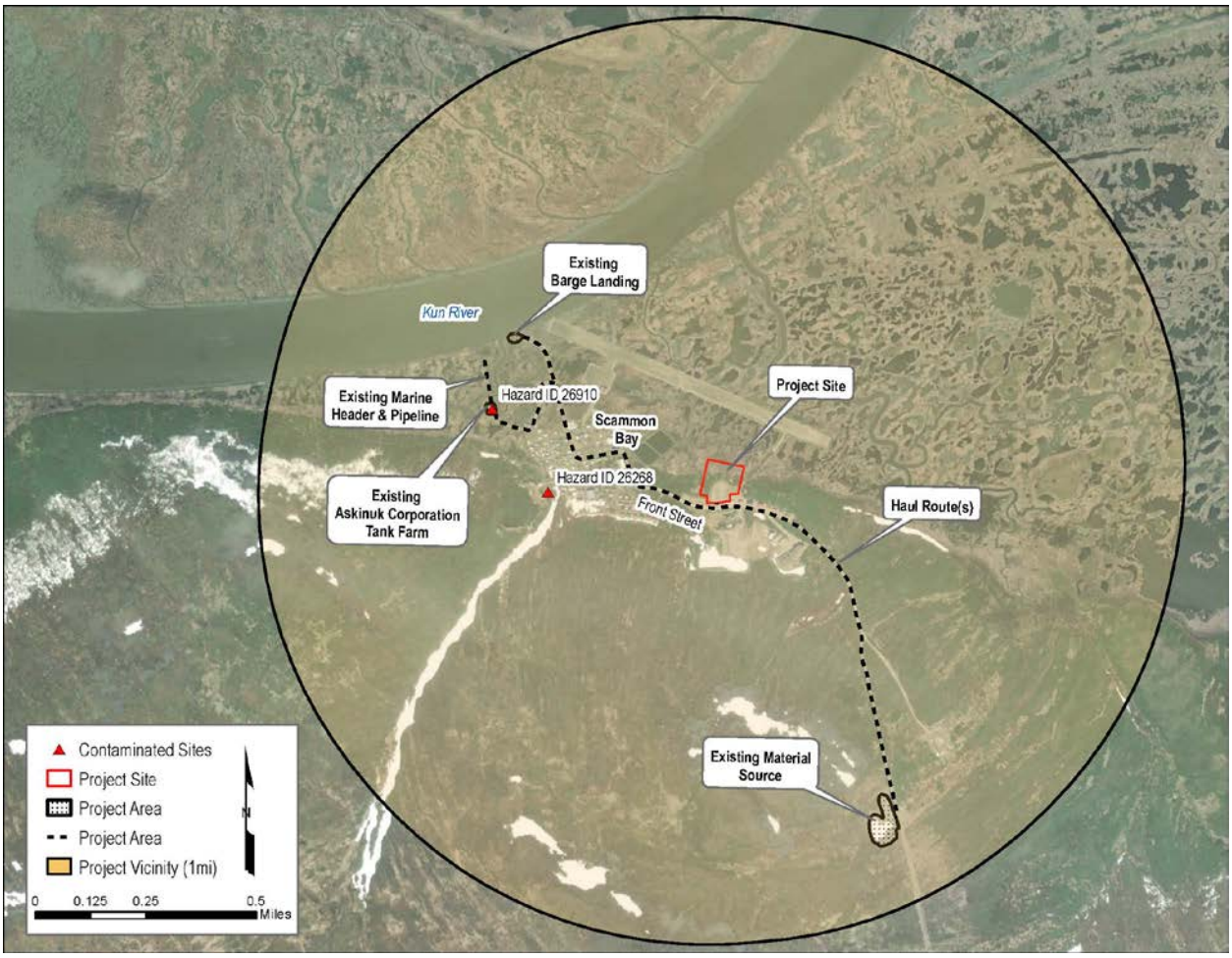


Figure 3-7. Contaminated Sites

3.8.1 Environmental Consequences - No Action Alternative

Under the No Action alternative, the Askinuk Corporation would continue to store fuel and operate the existing tank farm. The site would remain listed as a contaminated site with ADEC. The Askinuk Corporation would continue to consult with ADEC regarding on-going site contamination and future clean-up efforts.

3.8.2 Environmental Consequences - Proposed Action Alternative

Under the proposed Action Alternative all bulk fuel storage tanks and above ground piping, located at the contaminated site (hazard ID 26910), will be decommissioned. Additionally, the marine header and pipeline, located on the ground surface, which connects the tank farm to the marine header will also be decommissioned. All decommissioned material will be stored at the existing tank farm site and in a manner where the material will be inoperable and incapable of storing and dispensing fuel. Future consultation with ADEC regarding any excavation or ground disturbance at the contaminated site will be the responsibility of the Askinuk Corporation.

On August 31, 2021, HDL contacted ADEC's Contaminated Sites Division via email to clarify that excavation or significant ground disturbance is not proposed at the existing tank farm. On September 1, 2021, ADEC confirmed that since there is no excavation or significant ground disturbance planned at the existing tank farm that the existing contaminated site would not impact the Proposed Action Alternative and no further consultation is required per the scope of this project. A copy of ADEC correspondence regarding the existing tank farm is included in Appendix F.

3.9 Solid Waste

3.9.1 Affected Environment

Solid waste will be generated from decommissioning the exiting tank farm as well as from additional miscellaneous construction debris resulting from the proposed Action Alternative. The existing community landfill is located approximately 1-mile southeast of the community (Figure 3-1). The contractor is required to clean and cut up the tanks and piping material which will remain at the existing tank farm site. All decommissioned material will be stored in a manner where the material will be inoperable and incapable of storing and dispensing fuel. Any miscellaneous construction debris will be disposed of at existing community landfill.

3.9.2 Environmental Consequences - No Action Alternative

Under the No Action alternative no additional solid waste will be generated therefore, no direct or indirect impacts are anticipated.

3.9.3 Environmental Consequences - Proposed Action Alternative

Under the proposed Action Alternative, solid waste generated from decommissioning the existing tank farm will remain at the existing tank farm site. Miscellaneous construction debris would be disposed of at the local community landfill. The city of Scammon Bay has confirmed that the existing community landfill is able to accept incidental trash and debris that is generated during construction of the new tank farm.

During construction, the contractor is required to collect and make provisions for legal disposal of all solid waste before leaving the site at the end of the construction project, including but not limited to flagging, survey stakes, and non-biodegradable erosion and pollution control materials. Development of this site requires coordination with the ADEC, Division of Solid Waste to ensure that no waste is excavated during construction over the top of the old landfill site (HDL 2020).

3.10 Visual Impacts

3.10.1 Affected Environment

Visual changes within the project area include decommissioning of the existing tank farm, marine header, and pipeline as well as construction of a new tank farm at the project site. The existing tank farm, marine header, and pipeline will be decommissioned and stored in a manner where the material will be inoperable and incapable of storing and dispensing fuel. The existing bulk fuel tanks and piping material will be cleaned, cut up, and stored at the existing tank farm facility.

Construction of a new tank farm will occur on an existing gravel pad above the old community landfill will also result in a visual change to the surrounding area.

3.10.2 Environmental Consequences - No Action Alternative

Under the No Action Alternative, there would be no direct or indirect visual changes in the project area.

3.10.3 Environmental Consequences - Proposed Action Alternative

The proposed Action Alternative will result in visual change in the project area due to the decommissioning of the existing tank farm, marine header, and pipeline. Additionally there will be visual changes at the project site due to the construction of a new tank farm above the old community landfill. Visual changes associated with removal of the existing tank farm, marine header, and pipeline provides improved visual benefits to the community by decommissioning aging and obsolete infrastructure.

Construction of a new tank occurs at a site previously used as a landfill. Heavy equipment as well as vehicles, four-wheelers, and snow machine traffic have been previously observed at this site. Changes to the visual aspects of the old community landfill include construction and installation of above ground bulk fuel tanks, a gravel containment berm, vehicle dispensing station, retail sales building and other site supporting facilities. Recently, in the past three years residential homes have been constructed on adjacent properties. Owners of these homes will experience visual changes as the tank farm is constructed however, the industrial use of the site is comparable in visual character as well as intensity of previous use at the site, changes to the existing visual aspects of the proposed project site are negligible.

3.11 Noise

3.11.1 Affected Environment

Noise surrounding the new tank farm would increase primarily during daytime business hours due to vehicles, four-wheelers, and snow machines traveling to the site for refueling. Temporary increases in noise would also occur during annual bulk fueling events due to the use of large trucks hauling bulk fuel as well as the use of heavy equipment during construction. Noise sensitive areas have not been identified within the project vicinity.

3.11.2 Environmental Consequences - No Action Alternative

Under the No Action Alternative, there would be no direct or indirect changes to noise in the project area.

3.11.3 Environmental Consequences - Proposed Action Alternative

Although there will be an increase in noise at the project site due to vehicles, four-wheelers, and snow machines traveling to the site for refueling this increase in existing noise levels is not anticipated to significantly impact the surrounding environment.

3.12 Socioeconomic Impacts and Environmental Justice

3.12.1 Affected Environment

Socioeconomics identifies social and economic impacts within the human environment while environmental justice (EJ) ensures that all people regardless of race, color, nationality, or income are provided opportunities to be involved in project development and ensures they are not unfairly impacted by the proposed development. EO 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, directs federal agencies to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law.

Population Demographics

The Alaska Department of Commerce, Community and Economic Development (ADCCED) and the Alaska Department of Labor and Workforce Development (ADOL) websites contained the most accurate historical data that includes demographic data available for the Kusilvak Census Area, where Scammon Bay is located. The ADCCED estimates that the 2019 Scammon Bay population to be 593 with an estimated annual growth rate of 1.07 percent. Based on that data, the projected population in Scammon Bay will increase from 593 in 2019 to 797 in 2045 (ADCCED 2021, ADOL 2020, & HDL 2020a).

Income and Ethnicity

The ADCCED (2021) Community online database estimates the median household income in Scammon Bay as $31,875.00 with approximately 37.6% of the population living below the poverty threshold. Approximately 98.6% of Scammon Bay residents identify as Alaska Native. Other races include 0.6% of people who identify as white, and 0.6% of people who identify as two or more races.

Community and Public Services

Currently, there are five bulk fuel facilities within Scammon Bay; however, the Askinuk Corporation operates the only retail sales facility in the village where local residents can obtain either gasoline or diesel (ADCCED 2021).

Economics

The facility deficiencies at the existing tank farm remains an economic liability to the Askinuk Corporation and increases the uncertainty regarding fuel supply within the community (HDL 2020a).

Subsistence

The community of Scammon Bay relies on fishing and subsistence activities. Residents travel approximately 50 miles north to the Black River each summer. The Black River supports species such as Chum Salmon (*Oncorhynchus keta*), King Salmon (*O. tshawytscha*), Inconnu (*Stenodus leucichthys*), and Whitefish (genera *Prosopium* or *Coregonus*) (ADCCED 2021).

Environmental Justice

The Environmental Protection Agency's (EPA) EJ screening tool, known as EJSCREEN, is an environmental justice mapping and screening tool that uses a variety of environmental and demographic information to identify minority and/or low-income populations, environmental quality issues, and/or a combination of these within a certain geographical area (EPA 2021).

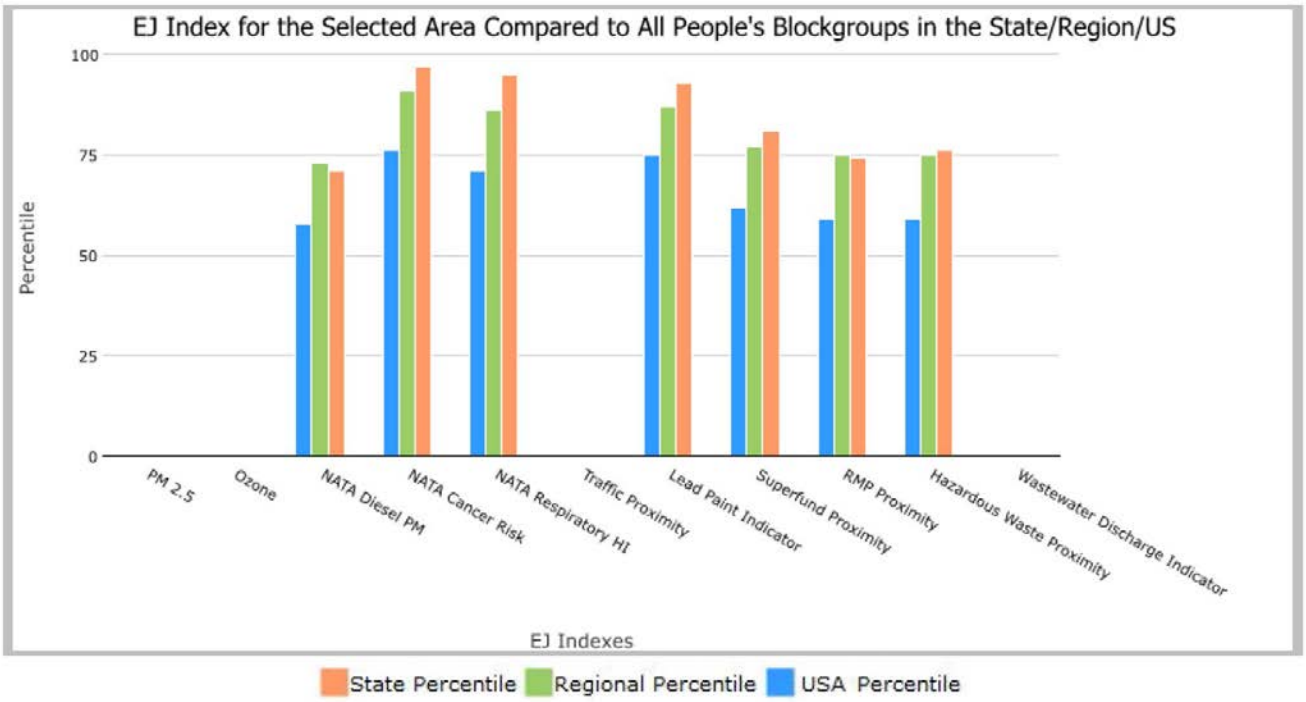
Environmental and demographic information is compared based on a geographic location and organized into eleven EJ indexes (listed below in Table 3-1). EJ indexes of a specific geographical area are then compared to the rest of Alaska, EPA Region 10, and the Nation. EPA Region 10 is comprised of four states that include Alaska, Washington, Oregon, Idaho, and 271 Tribal Nations (EPA 2021).

Table 3-1. EPA's Environmental and Demographic Indicators

Environmental Justice Indicators		Demographic Indicators
1. National Scale Air Toxics Assessment (NATA) Air Toxics Cancer Risk 2. NATA Respiratory Hazard Index 3. NATA Diesel PM (Particulate Matter) 4. Particulate Matter (PM2.5) 5. Ozone 6. Traffic Proximity and Volume 7. Lead Paint Indicator	8. Proximity to Risk Management Plan (RMP) Sites 9. Proximity to Hazardous Waste Facilities 10. Proximity to National Priorities List Sites 11. Wastewater Discharge Indicator (Stream Proximity and Toxic Concentration)	1. Percent Low-Income 2. Percent People of Color 3. Less than Highway School Education 4. Linguistic Isolation 5. Individuals Under Age 5 6. Individuals Over Age 64

Using the EJSCREEN tool, the community of Scammon Bay was compared the State of Alaska, EPA Region 10, and the Nation. Based on the project location only seven out of the eleven EJ indexes contained data. The EJ indexes for Scammon Bay identified the EJ risk factors as being in the 70th percentile or greater across all indexes when compared to the State of Alaska as well as EPA Region 10. The percentile of exposure to an EJ risk in Scammon Bay is reduced when compared to the entire Nation. Overall Scammon Bay is considered to be in a relatively high percentile for exposure to any of the EJ indexes when compare to the rest of the State of Alaska and EPA Region 10. It is important to note that these indexes are in percentiles. This means that, for example, when comparing Scammon Bay to the rest of the State, Scammon Bay is in the 74th percentile for the NATA Diesel PM exposure and that there is only 26th percentiles of the population in the state that have a higher exposure risk.

Table 3-2. EJ Index comparing Scammon Bay to the State of Alaska, EPA Region 10, and U.S.



3.12.2 Environmental Consequences - No Action Alternative

Under the No Action alternative, the Askinuk Corporation would continue to operate and maintain the existing facility. Due to the aging infrastructure, there is an increased risk in economic and financial liability to the Askinuk Corporation as there is an increased likelihood of a spill event leading to costly clean-up. The No Action alternative may also reduce the community's access to retail fuel and reduced storage capacity, which does not meet the needs of the community (HDL 2020a). Continued use of the existing tank site, even with construction of new tank farm, would still result in an increased risk of fuel spills and equipment failure due to seasonal flooding and ice jams.

3.12.1 Environmental Consequences - Proposed Action Alternative

The Proposed Action alternative would not cause disproportionately high or adverse impacts on any minority or low-income populations in accordance with provisions of EO 12898. A measureable change in community and public services, economics, subsistence, or EJ indexes is not anticipated. The Proposed Action alternative provides reliable access to retail fuel sales in the community. Residents in the community may also benefit through local employment during the construction phase of the Proposed Action alternative. Pesticides and chemicals other than fertilizer for seeding disturbed areas will not be used.

3.13 Public Health and Safety

3.13.1 Affected Environment

The existing tank farm infrastructure is currently at the end of its useful life. Due to the proximity of the existing tank farm to the Kun River, there is an increased risk of a major spill event caused by local flooding or ice jam. A major spill event has the potential to adversely impact the Kun River, which is an important aquatic and subsistence resource in the community.

3.13.2 Environmental Consequences - No Action Alternative

Under the No Action alternative, the Askinuk Corporation would continue to store fuel and operate the existing tank farm. The risk of a major spill event would continue to increase as well as the potential impacts to public health and safety. Additionally, as the existing tank farm continues to age there will be less capacity to store fuel resulting in less availability to local residents.

3.13.3 Environmental Consequences - Proposed Action Alternative

Each year the community is re-supplied with fuel via barge. In order to off-load fuel from the barge, it will be transported from the barge header, through town, to the new tank farm. Although the Proposed Action alternative will result in a minor increase in seasonal vehicular traffic (fuel transport trucks) on community roadways, the community is accustomed to fuel delivery trucks transporting fuel through town using local haul routes (Figure 3-1). The local school, located approximately 650 feet southeast of the proposed project area, refills its tank farm using transport trucks to haul fuel along a similar route.

Ultimately, the Proposed Action alternative is a beneficial impact with the community of Scammon Bay because it provides a reliable and secure location to store bulk fuel within the community. Construction of the Proposed Action alternative would reduce potential adverse environmental and socioeconomic impacts associated with bulk fuel storage and use.

3.14 Summary of Key Impacts: Cumulative Impacts, Unavoidable Adverse Impacts, and Irreversible and Irretrievable Commitment of Resources

3.14.1 Cumulative Impacts

Cumulative impacts are the results from past, present, and future actions that impact resource categories and are also assessed in combination with other projects that have been completed, are being completed, or will be completed in the reasonably foreseeable future. Cumulative impacts are addressed only when a resource experiences more than a negligible adverse effect from the proposed action. Since the Proposed Action alternative does not result in a more than negligible adverse impact to any of the environmental resources listed above, no further cumulative impact analysis is required.

The only future proposed community project involves rehabilitation of the community airport. No other projects are currently proposed within the community.

3.14.2 Unavoidable Adverse Impacts

There are no unavoidable adverse impacts associated with the Proposed Action alternative. Adverse impacts are those that are considered more than negligible and have adverse impacts that cannot be mitigated.

3.14.3 Irreversible and Irretrievable Commitment of Resources

The Proposed Action alternative would result in the irreversible and irretrievable commitment of resources of gravel fill and available space at the community landfill. NEPA review requires identification of significant irreversible and irretrievable commitment of resources from development of the Proposed Action (40 CFR 1502.16). Irreversible and irretrievable commitment of resources are defined as actions that permanently impact natural resources and primarily involves the use of a non-renewable resource.

Approximately 10,000 cubic yards of gravel material will be permanently removed from an existing material source located south of Scammon Bay. Use of this material is necessary to improve the existing gravel pad and support construction of a new tank farm. Landfill space will be permanently used incidental trash and construction debris. Although the existing community landfill will permanently be impacted by taking this debris the amount of waste will have a negligible effect on its long term capacity.

3.15 Environmental Commitments and Mitigation Measures

Mitigation measures are measures used to mitigate impacts to reduce adverse impacts. Since none of the potential impacts to resource categories are considered significant, no mitigation measures are proposed. Environmental commitments are general environmental practices and guidelines used to avoid or reduce potential impacts to environmental resources within the project area. Table 3-3 below contains a summary of environmental commitments that are applicable to the proposed Action Alternative.

Table 3-3. Proposed Environmental Commitments

Affected Environment	Environmental Commitments
Cultural Resources	If cultural, archaeological, or historic resources are discovered during project construction, all work that may impact these resources will stop until AEA and DC consults SHPO to determine the appropriate corrective action.
Land Use, Zoning, and Development	The landfill gravel cap should consist of at least 2 inches of cover over the waste in addition to the tank farm's structural gravel pad. The tank farm gravel pad should be designed to avoid additional settlement within the landfill waste.
Wetlands & Other Waters of the U.S.	Design proposed tank farm footprint to use the existing pad to the maximum extent practicable.

Wildlife	To the maximum extent practicable, construction and development of the proposed tank farm will occur on previously disturbed ground and would minimize removal of preferred vegetative habitat for wildlife species within the area. Disturbance to migratory bird species will be minimized by following the USFWS recommended time periods for avoiding clearing in Yukon-Kuskokwim Delta (May 5 – July 25), except as allowed by state, federal, and local laws. Additional limitations for clearing may be applicable if clearing takes place in Canada geese and swan habitat or black scoter habitat. The project area will be surveyed for the presence of eagles or their nests prior to construction in order to avoid impacts to nests or nesting birds. The contractor will be required to perform a survey for eagle nests prior to and during construction. If any nests are discovered within 660 feet of the project area during construction, the USFWS will be consulted for guidance on how to proceed.
Vegetation	Disturbed areas will be re-vegetated with seed recommended for the region by ADNRs *A Revegetation Manual for Alaska*. Vegetation clearing will also occur during the USFWS recommended time periods for avoiding clearing in Yukon-Kuskokwim Delta (May 5 – July 25), except as allowed by state, federal, and local laws. Additional limitations for clearing may be applicable if clearing takes in Canada geese and swan habitat or black scoter habitat.
Threatened & Endangered Species	The new facility will be incorporated into Scammon Bay's current SPCC plan for the existing tank farm operations. The contractor may also develop a SPCC plan for operations related to their work. Prior to construction, a survey of the project area will be completed to identify any Eiders or nesting sites that may exist.
Water Quality	Use BMPs to limit storm water runoff that may lead to increased erosion and sedimentation.

3.16 Permits and Approvals

The following permits and approval would likely be required prior to construction of the Proposed Action:

- ADEC Construction General Permit
- ADEC Section 401 Water Quality Certification
- The contractor will be required to secure all permits and clearances necessary for material and disposal sites used for the project. Material and disposal sites that have not received the appropriate permits and clearances will not be accepted for project construction.

4.0 Comments and Coordination

The process of soliciting comments and information from the public and agencies on the purpose and need for a project, project alternatives, and possible issues and concerns that need to be addressed during the environmental review and design stages of a project, is called "scoping." Scoping is an integral part of the environmental documentation process required by NEPA. Documentation of all public and agency scoping efforts, including meetings, materials, and comments received is included in Appendix G.

4.1 Public Involvement

A public meeting to present the project scope, purpose and need, and tank farm location alternatives occurred on June 29, 2020, with 15 people in attendance. Public meeting documentation included a project flyer and sign in sheet. A variety of public comments were received and were categorized into comments regarding tank farm location and project scope (see Appendix G). Majority comments were related to the tank farm location alternatives with people identifying their preference for a site.

Public comments from community members were collected throughout the life of the project with the majority of community members supporting the proposed development and expressing a need for a new tank farm in their community.

4.2 Agency and Tribal Involvement

The NVSB, the Askinuk Corporation, and the City of Scammon Bay have all participated in the development and design of the proposed project. The NSVB and the Askinuk Corporation have taken lead roles in development and coordination while the City of Scammon Bay has played a supporting role.

HDL and AEA have regularly met with the NVSB and the Askinuk Corporation throughout the design and development of the project. On June 29, 2020, an in person meeting at the NVSB tribal office occurred. The project team separately met with each entity to present the project scope and alternatives. On May 21, 2021, a joint virtual meeting with the NVSB and the Askinuk Corporation occurred where a project design was presented at the preferred location.

HDL, in accordance with NEPA procedures and on behalf of AEA and DC, emailed scoping letters to regulatory agencies, local governments, and tribal organizations on April 16, 2021. The letters provided background on the proposed project, a review of environmental resources in the project area, and an invitation to comment on the Proposed Action alternative. The following agencies or organizations received scoping letters:

Table 4-1. Agency Scoping Contact List

Federal Agencies
USACE
EPA
USFWS (General)
USFWS Endangered Species
State Agencies
Alaska Department of Commerce, Community, & Economic Development
ADEC (General)
ADEC Division of Environmental Health, Solid Waste Program
ADEC, Division of Spill Prevention and Response, Contaminated Sites
ADEC, Division of Water, APDES
ADEC, Division of Air Quality, Non-Point & Mobile Sources Program
ADF&G, Division of Habitat
ADF&G, Division of Habitat, Invasive Species Program
ADNR, Division of Parks and Outdoor Recreation, Land and Water Conservation Fund 6(f)
ADNR, Division if Parks & Outdoor Recreation, SHPO
Local Governments
City of Scammon Bay
Tribal Organizations
Native Village of Scammon Bay
Alaska Native Corporations
Askinuk Corporation
Calista Corporation

The agency scoping period ended on May 17, 2020. Four agencies provided comments and their associate responses are summarized below.

- ADEC Contaminated Sites: Identified the existing tank farm known as Askinuk Corp Tank Farm (Haz ID 26910) as a known contaminated site. ADEC approval is required before disposing of any or moving any contaminated soil or ground water off the site. Additionally a clean-up plan may be required.
  Response: The proposed project will decommission existing tanks and piping at the existing tank farm; however, no excavation or significant ground disturbing work is anticipated. It is the sole responsibility of the Askinuk Corporation to continue consultation and coordination with ADEC regarding additional clean-up at the existing tank farm location. Additional consultation between HDL and ADEC confirmed no further consultation is required. See Appendix F for consultation documentation.

- Askinuk Corporation: Consultation with the Askinuk Corporation has been on-going through the design and development of the proposed project. Their agency scoping comments confirmed support for relocating the existing tank farm to due to flood risk. The Askinuk Corporation does not require any permits or clearance to complete the proposed project.
  Response: Consultation with the Askinuk Corporation to address any comments or concerns regarding to design and development of the project is on-going.

- EPA: The EPA provided comments on specific environmental resources categories that should be addressed during development of the EA. These resources included water quality, aquatic resources, permafrost and vegetation, solid waste, hazardous materials and wastewater management, endangered species, cumulative effects, climate change, coordination with tribal governments, environmental justice, and public participation.
  Response: EPA's comments have been incorporated into the development and review of the resource impact categories for the proposed project.

- ADNR's State Historic Preservation Officer (SHPO): The Alaska SHPO provided comments acknowledging that Scammon Bay has existing culturally sensitive sites within the project vicinity. The Alaska SHPO confirmed their role as a consulting party under Section 106 of the NHPA, recommended a resource identification effort by a professionally qualified individual (PQI), and recommended initiating consultation and ensuring a well-defined Area of Potential Effect.
  Response: The comments provided by the Alaska SHPO have been incorporated into the Section 106 Consultation process. A desktop cultural resource assessment was completed by a PQI on October 2020. Further consultation with the Alaska SHPO has been completed under the Section 106 process.

4.3 EA Distribution

This EA is provided electronically to the following project stakeholders and other interested parties listed in Section 4.2. AEA and the DC published a public notice that the EA is available to review on their website. Copies of the EA are available for public review at the following locations:

- DC Project Database System webpage (https://www.denali.gov/)
- AEA Public Notice webpage (https://aws.state.ak.us/OnlinePublicNotices/Default.aspx)

5.0 List of Authors and Reviewers

Staff at HDL prepared this EA with oversite from AEA. The Denali Commission completed a review of the EA and has overall responsibility for the agency decision.

Table 5-1. List of Authors, Reviewers, and Persons Contacted

Name	Affiliation	Role
Tom Wolf	DC	Reviewer
William Price, P.E.	AEA	AEA Project Manager, Engineer
Tyde Riopelle, P.E.	AEA	AEA Project Manager, Engineer
Mark Swenson, P.E.	HDL	HDL Project Manager
David Cooper, P.E.	HDL	HDL Project Engineer
Heather Campfield	HDL	EA Reviewer
Owen Means	HDL	EA Reviewer
Brooke Therrien	HDL	EA Author

6.0 References

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APPENDIX A

Site Selection Memorandum

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Site Selection Memorandum (July 14, 2020) A-1

HDL ENGINEERING Consultants LLC

MEMORANDUM

DATE: July 14, 2020

TO: Bill Price, P.E.

FROM: Owen Means/Mark Swenson, P.E.

RE: Site Selection Memorandum
Scammon Bay Bulk Fuel Upgrade Project

CIVIL ENGINEERING

GEOTECHNICAL ENGINEERING

TRANSPORTATION ENGINEERING

ENVIRONMENTAL SERVICES

PLANNING

SURVEYING & MAPPING

CONSTRUCTION ADMINISTRATION

MATERIAL TESTING

REAL ESTATE SERVICES

INTRODUCTION AND BACKGROUND

The Alaska Energy Authority (AEA), in cooperation with the Native Village of Scammon Bay (NVSB), the City of Scammon Bay (City), and the Askinuk Corporation (Corporation), is proposing to construct a new bulk fuel tank farm in Scammon Bay, Alaska. The new tank farm would be owned by NVSB and operated by the Corporation.

This Site Selection Memorandum presents and evaluates potential site alternatives for the new tank farm. This report describes the purpose and need for the project; design standards for the new facility; process used to identify and evaluate site alternatives; and provides a comparison of the alternatives. The purpose of this report is to inform the decision-making process so that project stakeholders can select a site alternative that meets the needs of the community.

This report provides a recommended site alternative based on concept-level engineering analyses conducted on cost effectiveness, constructability, and operability. Following selection of a final site alternative by NVSB, AEA will carry the selected alternative forward for detailed analysis in the Concept Design Report and 35% design.

Project Need and Purpose

Bulk fuel storage for retail sales of heating oil and gasoline in Scammon Bay is provided by the Askinuk Corporation-owned and operated tank farm located to the northwest of the village. The tank farm is subject to periodic flooding and ice flows during the fall, winter, and spring, and is at risk of erosion and damage to its foundation, embankment, and containment dikes. The facility has also reached the end of its useful life, as the majority of the tanks are Bureau of Indian Affairs (BIA) style vertical tanks that are over 40 years old. There are several code violations and safety risks associated with the tank farm's current condition and there is a history fuel leaks and releases outside secondary containment.

The purpose of this project is to provide a new, code-compliant retail sales tank farm in Scammon Bay that mitigates risk from flooding, ice damage, and erosion.

DESIGN CRITERIA

Fuel Storage

The existing Corporation tank farm features 17 tanks, some of which are deteriorated and not in use, and one that is currently located outside the tank farm's secondary containment. The fuel storage capacity is approximately 140,000 gallons, of which there currently is 90,000 useable gallons.

Askinuk Corporation provided fuel delivery data for the years 2015-2016 and 2018-2019 (Table 1). According to the fuel delivery data, the facility typically receives on average 121,750 gallons of fuel per year (50,000 gallons diesel and 71,750 gallons gasoline). The facility typically receives deliveries of both Diesel #1 and gasoline in the spring and the fall. Gasoline is used by all-terrain vehicles (ATVs) and small marine vessels and Diesel #1 is used for home heating. Gasoline use is reportedly greatest in the summer when ATV use and fishing are at their peak. Diesel fuel use is generally greatest between September and April.

Table 1: Existing Fuel Delivery Data

Year	Diesel #1 (gallons)	Gasoline (gallons)	Total annual (gallons)
2015	60,000	70,000	130,000
2016	40,000	90,000	130,000
2018	40,000	70,000	110,000
2019	60,000	57,000	117,000
Four-year average	**50,000**	**71,750**	**121,750**

Scammon Bay has experienced steady population growth between 1980 (pop. 250) and 2018 (pop. 598) (Alaska Department of Labor and Workforce Development [ADLWD] 2018). The ADLWD projects the total population of the Kusilvak Census Area, where Scammon Bay is located, will increase from 8,333 persons in 2018 to 11,105 in 2045, an annual growth rate of 1.07 percent (ADLWD 2018). Using the 1.07 percent annual growth rate, the projected population in Scammon Bay will increase from 598 in 2018 to 797 in 2045.

Fuel storage calculations were performed based on available fuel delivery data for 2015 through 2020, and adjusted for projected population growth in the community. The fuel storage projection uses a design year of 2045 (25 years). The projection assumes that all fuel sold is consumed by the community for the identified uses of home heating and ATV and small marine vessels, and the proportion of fuel demand for Diesel and gasoline will remain constant in the future. Other than those resulting from projected population growth, there are no new facilities or projects planned or known by the community that would add additional fuel demand. Construction projects, such as planned improvements to the Scammon Bay Airport and water/sewer infrastructure, require a significant quantity of fuel for operating equipment; however, we assume the construction contractor would be responsible for supplying their own fuel and would not rely on the local fuel supply.

Using an annual growth rate of 1.07%, the projected fuel demand in Scammon Bay will increase from the current 121,750 gallons to 160,534 gallons in 2045. The projected demand

for Diesel #1 will increase from the current 50,000 gallons to 65,928 gallons in 2045, and the projected demand for gasoline will increase from the current 71,750 gallons to 94,606 gallons in 2045. Assuming 90 percent of useable capacity per tank, the projected fuel storage required in 2045 is 73,253 gallons diesel and 105,118 gallons gasoline (178,371 gallons aggregate).

SITE VISIT

The project team (Mark Swenson, Kent Kornegay, and Owen Means of HDL and Bill Price of AEA) conducted a site visit to Scammon Bay on June 29, 2020. The purpose of the site visit was to:

- investigate potential sites for the new tank farm facility and header alignments;
- verify the condition of existing horizontal tanks in the existing Corporation tank farm and determine their suitability for re-use;
- evaluate foundation requirements;
- assess typical construction methods;
- investigate local access, labor, and heavy equipment availability;
- refine our understanding of the logistics of transporting construction materials and equipment to the community; and
- perform environmental fieldwork at sites where new ground disturbance would occur.

The team arrived in Scammon Bay via charter at approximately 11:30 am, where representatives with NVSB met the project team and provided transportation to the existing Corporation tank farm and marine header, potential tank farm sites, the community material source, the school tank farm, and tribal office.

NVSB provided local knowledge and input during the course of the investigation, including information about seasonal timing and locations of flooding and ice flows, occupancy of buildings in the community, property ownership, and additional sites that may be available for use as a tank farm that were not previously known to the project team.

The project team also met with Corporation tank farm management to discuss challenges with maintenance and operation of the existing tank farm and to identify goals and desires for the new facility. Corporation management provided information regarding the timing and volume of fuel deliveries, public fuel sales and dispensing operations, recent fuel shortages, and future work planned to address petroleum-contaminated soils at the existing Corporation tank farm.

A public open house was held outside at the tribal office building at 4:30 pm to present the project to the public. Fifteen people participated, including several members of the NVSB Tribal Council and the Corporation Board of Directors. A summary of input from the public, Corporation, and NVSB is provided in the following section.

The project team departed Scammon Bay via charter at approximately 5:30 pm.

SITE SELECTION

Prior to conducting a site visit to investigate potential tank farm sites, HDL conducted office-based research to determine basic information about property ownership, fuel usage and

barge deliveries, and current site usage. The following general criteria were used to gain an understanding of the suitability of the potential tank farm locations:

- Property ownership
- Marine header construction
- Flood elevation and erosion
- Pad construction
- Site access
- Operation and Maintenance
- Construction cost

Site Alternatives for New Tank Farm Facility

Using the constraints listed above, AEA and HDL identified three sites (Figure 1) for investigation during the site visit: Site 1, ("hill site"), Site 2 ("AVEC [Alaska Village Electric Cooperative] site"), and Site 3 ("landfill site"). Another alternative, the "sewage lagoon site", located adjacent to and northwest of the community sewage lagoon, was considered initially, but was determined to not be a practicable alternative because it would require significant fill to construct a pad and a longer marine header pipeline than Site 1 and Site 2. Therefore, the sewage lagoon site was dismissed from further consideration during the site visit.

- Site 1 – Hill Site is located west of the village and approximately 400 feet south of the existing Corporation Tank Farm. Site 1 would require repair and drainage improvements to 300 feet of existing access road, and an approximately 1,300 feet of marine header pipeline through wetlands and anadromous fish habitat.
- Site 2 – AVEC Site is located immediately adjacent to and north of the existing AVEC tank farm. Site 2 has direct access from Kun Street. The site would require an approximately 1,200-foot marine header pipeline parallel to the existing AVEC pipeline and negotiations with AVEC to acquire property for tank farm construction.
- Site 3 – Landfill Site is located on the gravel pad covering the old community landfill. During the site investigation, NVSB representatives suggested including this site as an alternative. The site would require trucking fuel from the barge to the tank farm to receive fuel.

Community Input

During meetings with the public and NVSB and Corporation representatives, the project team discussed the overall purpose, need, and scope of the project; the challenges of operating and maintaining the existing Corporation tank farm; the sites being considered for development of the new tank farm; and operation and maintenance considerations for the new tank farm. Using the basic information known to the project team about each of the sites described above, the project team asked for the community's input on a new tank farm location. The following comments were recorded. Responses from the project team are shown in italics.

Tank farm location

- Askinuk Corporation intends to donate land and gravel for construction of the new facility.
  Project team response: Land and gravel donations from the Corporation will be taken into account in the Rough Order-of-Magnitude cost estimates generated for this report.
- Prefer Site 1 because it is away from residences.
  Project team response: Thank you for your comment.
- Site 1 has wet seeps coming from the hillside.
  Project team response: The design for the new tank farm would need to account for hydrological conditions at the site.
- Site 1 has snow drifts up to 30 feet high during the winter.
  Project team response: The design for the new tank farm would need to account for snow drifting conditions at the site.
- Would Site 2 be constructed using a gravel pad or piles?
  Project team response: The tank farm foundation would be determined during the CDR phase of the project.
- At Site 1 and Site 2, the soil moves and is unstable.
  Project team response: A geotechnical evaluation will be conducted and stable foundation will be designed for the site.
- Object to Site 3 because it is a fire and explosion hazard for the nearby residences and the school.
  Project team response: The new tank farm would be sited according to setback requirements of the International Fire Code.
- Object to Site 3 because you would be able to smell fuel from the nearby residences.
  Project team response: The new tank farm will not have the severe fuel smell that the existing tank farm has.
- Site 3: Would there be a surcharge for trucking fuel that would affect fuel costs?
  Project team response: Yes, a fuel surcharge for trucking in the amount of approximately $0.25 per gallon may be added to the base fuel price.
- Site 3: Gas is mostly used in the summer. It would be a hassle for the fuel to be on the other side of town than the Corporation office. The Corporation has not consistently delivered fuel using its mobile fuel trailer.
  Project team response: The Corporation has offered to deliver fuel to boats on a more consistent basis.
- Site 3 would take up space that could be used for two or three homes.
  Project team response: The tank farm site is located above a closed landfill which is not typically used for residential home construction.
- When considering snow drifting, the school installed snow fences to mitigate drifting.
  Project team response: Thank you for your comment.
- A representative of NVSB stated they prefer Site 3.
  Project team response: Thank you for your comment.
- Several open house attendees expressed their preference for Site 3.
  Project team response: Thank you for your comment.

Other

- The community is considering to request that AVEC move their tank farm to a location near Site 1.
  Project team response: Thank you for your comment.
- A fuel spill occurred at the AVEC tank farm near Site 2 is the past.
  Project team response: Thank you for your comment.
- Will there be cost estimates for each alternative?
  Project team response: Rough Order-of-Magnitude estimates will be generated for consideration during site selection.

Project scope

- Site 1 should include a dike constructed of rock from the hill to the river to inhibit flooding and ice flows from reaching the community.
  Project team response: Construction of a dike is not in the scope of the project.
- What size tanks will be installed?
  Project team response: Horizontal tanks are usually 27,000 or 30,000 gallons. Vertical tanks range in size up to 50,000 gallons.

SITE EVALUATION AND COMPARISON

The following section presents an evaluation of each site against the site selection criteria described above, and after consideration of community input provided to the project team during the site visit and public open house. It is important to note that this a general overview of the evaluation criteria as it applies to each site. This is not a completed conceptual design report, and additional research of the selected site will be required prior to design.

Site 1 – Hill Site

1. Property ownership: The gravel pad, access road, and marine header pipeline would all be located on Corporation property. Property would need to be conveyed to NVSB to establish site control.
2. Marine header construction: Fuel delivery would be through an approximately 1,300-foot pipeline that crosses a fish stream. The stream crossing would require a new large-diameter culvert and provisions to protect the culvert and pipeline from ice, flooding, and erosion. A permit from the Alaska Department of Fish and Game and a detailed hydrology and hydraulics study would need to be performed to determine appropriate design and construction measures to ensure fish passage and mitigate erosion concerns.
3. Flood elevation and erosion: The gravel pad would be located above historical flood elevations. The access road would be constructed within a low-lying area that is inundated with water and may be subject to damage from flooding and ice.
4. Pad construction: The gravel pad would be constructed at the base of the hill. The area is known to contain seeps, but is at a higher elevation than the adjacent marsh. An estimated 9,200 cubic yards of fill would be required to construct a stable, 5-foot-thick pad for the tank farm. The pad would need to be constructed with extra room to

allow equipment to remove drifting snow. Fill material of sufficient volume and quality is assumed to be available locally at the Corporation-owned material site.

5. Site access: Site 1 would require an access road connecting the facility to Fuel Farm Road and would require easements. An estimated 450 cubic yards of fill would be required to construct a stable base for the access road.
6. Operation and Maintenance: Site 1 is located in an area known to accumulate large snow drifts. Severe drifting would affect the operation of the tank farm. Severe drifting was experienced in a similar hillside cut for the school tank farm and the school elected to relocate their tank farm to mitigate the drifting. Snow would need to be removed more frequently for safe operation of the facility.
7. Construction cost (w/ 25% contingency): $6,521,000
8. Fuel cost considerations: Future fuel costs would be similar to future fuel costs at the existing tank farm.

Site 2 – AVEC Site

1. Property ownership: The gravel pad and header pipeline would be located property owned by AVEC, and would require subdividing and acquiring the unused portion of the lot from AVEC.
2. Marine header construction: Fuel delivery would be through a 1,300-foot header pipeline that follows the AVEC pipeline alignment and header location.
3. Flood elevation and erosion: Site 2 is located on marshy ground that is known to be inundated with water during flood surges; however, the site is not expected to experience damage or significant erosion from ice flows.
4. Pad construction: An estimated 16,400 cubic yards of fill would be required to construct a stable, 8-foot-thick pad for the tank farm under Option A – Gravel Pad.
5. Site access: Site 2 would be accessed directly from Kun Street.
6. Operation and Maintenance: Operation and maintenance at Site 2 would likely be the easiest of the three alternatives, and would be similar to the existing tank farm.
7. Construction cost (w/ 25% contingency):
   Option A – Gravel Pad: $5,692,300
   Option B – Steel containment: $8,915,000
8. Fuel cost considerations: Future fuel costs would be similar to future fuel costs at the existing tank farm.

Site 3 – Landfill Site

1. Property ownership: The gravel pad would be located on a combination of Corporation-owned and City-owned land. City-owned land includes an easement on the northern portion of the old landfill site. The site would require acquisition of the land currently held in easement by the City and conveyance of the remainder of the tank farm site from the Corporation to NVSB. Site 3 would require coordination with the Alaska Department of Environmental Conservation (ADEC), Division of Solid Waste to ensure that no waste is excavated during construction at the old landfill site.
2. Marine header construction: Site 3 would require an approximately 3,900-foot pipeline to utilize a marine header for fuel deliveries. Due to land availability, the pipeline would need to run through the village along community roads. Pipeline

installation would cause severe impacts to the community during construction. Significant relocations of other utilities would be required. The pipeline would contain fuel year-round. The cost of a marine header and pipeline for Site 3 would be an additional $1,095,000. For these reasons, Site 3 includes deliveries made using fuel trucks. Insurance premiums for the facility may be renegotiated based on the change in fuel delivery method.

3. Flood elevation and erosion: Site 3 is located on high ground above flood elevations.
4. Pad construction: Site 3 is located on an existing gravel pad on top of the old community landfill. An estimated 5,700 cubic yards of fill would be required to construct a stable, 1-foot-thick pad for the tank farm.
5. Site access: Site 3 would be accessed directly from Front Street via the existing gravel driveway.
6. Operation and Maintenance: Operation and maintenance of the facility would be similar to existing. However, fuel sales would require a fueling operator to be present at the facility for dispensing.
7. Construction cost (w/ 25% contingency): $3,889,800
8. Fuel cost considerations: An approximately $0.25 per gallon surcharge for trucking can be expected to be added to the base price charged by fuel providers.

Cost Comparison

Approximate costs for large-dollar items for each site are presented below. Total construction costs include 25 percent contingency.

Site 1 – Hill Site

- Land acquisition: $0
- Site work: $2,741,800
- Site access construction: $195,000
- Tanks and piping: $1,010,000
- Truck fill station: $0
- Marine header construction: $470,000
- Dispenser: $100,000
- Sales building: $50,000
- Labor and equipment: $650,000
- **Total construction cost: $6,521,000**

Site 2 – AVEC Site

Option A – Gravel pad:

- Land acquisition: $150,000
- Site work: $2,371,800
- Site access construction: $0
- Tanks and piping: $1,010,000
- Truck fill station: $0
- Marine header construction: $472,000
- Dispenser: $100,000
- Sales building: $50,000

- Labor and equipment: $550,000
- **Total construction cost: $5,692,300**

Option B – Pile supported steel:

- Land acquisition: $150,000
- Steel containment construction: . $4,000,000
- Site work: $440,000
- Site access construction: $0
- Tanks and piping: $1,070,000
- Truck fill station: $0
- Marine header construction: $472,000
- Dispenser: $100,000
- Sales building: $50,000
- Labor and equipment: $1,000,000
- **Total construction cost: $8,915,000**

Site 3 – Landfill Site

- Land acquisition: $0
- Site Work: $1,301,800
- Site access construction: $0
- Tanks and piping: $1,010,000
- Truck fill station: $150,000
- Marine header construction: $0
- Dispenser: $100,000
- Sales building: $50,000
- Labor and equipment: $500,000
- **Total construction cost: $3,889,800**

Decision Matrix

The decision matrix shown below provides a "ranking" of each the evaluation criteria applied to each site (Table 2). The optimal site for a given criteria was given a ranking of "3" and the least optimal was given a ranking of "1."

Table 2: Ranking of Tank Farm Sites

Evaluation Criteria	Site 1 – Hill Site	Site 2 – AVEC Site	Site 3 – Landfill Site
1. Property ownership	3	1	3
2. Marine header	1	3	2
3. Flood elevation & erosion	2	1	3
4. Pad construction	2	1	3
5. Site access	1	2	3
6. Operation & maintenance	1	3	2
7. Construction cost	1	2	3
8. Fuel cost considerations	3	3	1
Total Score:	**13**	**15**	**20**

Recommended Site for Development

Based on the evaluation criteria discussed in this memo, the recommended site for construction of the new tank farm facility is Site 3 – Landfill Site. The cost of installing the facility at this site is expected to be significantly less than Sites 1 and 2, allowing construction to occur sooner than alternative sites. Additionally, this site has reduced risk of damage from flooding, floating ice, and erosion; will require less earthwork; and is not expected to experience large snow drifting. The site will require coordination with the ADEC for construction of a tank farm at the site to ensure that no waste is excavated during construction.

We understand the retail price of fuel is a high priority for the community. If retail fuel price is the community's first priority for site selection, then the recommended site for the facility is Site 2 – AVEC Site, Option A – Gravel Pad. Site 2 would allow for fuel deliveries to continue via barge header. However, construction may be delayed significantly due to funding challenges associated with the higher construction cost and the need for fill material to settle for one or more years during pad construction. In addition, the community would need to work with AVEC to re-acquire a portion of AVEC's lot for site control.

attachments: Figure 1: Tank Farm Site Alternatives



TANK FARM SITE ALTERNATIVES

SCALE: 1" = 200'

A-11

ONE INCH

REVISIONS		
MARK	DATE	DESCRIPTION

NOT FOR CONSTRUCTION

HDL ENGINEERING Consultants LLC
civil - geotechnical - surveying - environmental - material testing
ANCHORAGE
907.564.2120
MAT-SU
907.746.5230
3335 Arctic Boulevard, Suite 100 Anchorage, AK 99503
AECL861
www.HDLalaska.com

ALASKA ENERGY AUTHORITY

SCAMMON BAY BULK FUEL UPGRADES

SCAMMON BAY, ALASKA

SHEET TITLE
TANK FARM
SITE ALTERNATIVES

SHEET
C2.1

DRAWN BY:	CHECKED BY:
KK	MRS
DATE: 07/06/20	SCALE: AS SHOWN

JOB NUMBER: 20-017

APPENDIX B

Non-Relevant Environmental Resources

Table of Contents

Non-Relevant Environmental Resources.....B-1

Environmental Impact Categories Not Affected

The following environmental impact categories are not relevant to the project because the resources considered having no measurable impacts, no resources in the project area, or that required studies or agency consultation to make those determinations.

- Air Quality
- Fisheries
- Waterbodies
- Recreational Resources
- Wild and Scenic Rivers
- Coastal Barriers
- Coastal Zone
- Floodplains and Regulatory Floodway
- Prime and Unique Farmland
- Soils and Geological Resources
- Invasive Species
- Climate Change
- Transportation

1. Air Quality

A review of the Alaska Department of Environmental Conservation (ADEC) *Air Pollution in Alaska Communities* website indicated the proposed project is not within an air quality maintenance or non-attainment area (ADEC 2021).

2. Fisheries

The Alaska Department of Fish and Game (ADF&G) *Catalog of Waters Important to the Spawning, Rearing or Migration of Anadromous Fishes* does not list any anadromous fish streams or other water bodies in the project area. Essential Fish Habitat does not occur in the project area (ADF&G 2021).

3. Waterbodies

There are no waterbodies within the project area.

4. Recreational Resources

There are no recreational resources within the project area.

5. Wild and Scenic Rivers

No waterways within the project area are part of the National Wild and Scenic River System (NWSRS) or under study for designation as a Wild and Scenic River (NWSRS 2021).

6. Coastal Barriers

There are no designated units of the Coastal Barrier Resources Act in Alaska (U.S. Fish and Wildlife Service [USFWS] 2020).

7. Coastal Zone.

The Alaska Coastal Management Program expired in June 2011 by operation of Alaska State Law, resulting in withdrawal from participation in the Coastal Zone Management Act's National Coastal Management Program. Consistency provisions of the Act and enforceable policies of local coast zone management plans no longer apply in Alaska.

8. Floodplains and Regulatory Floodway

The Federal Emergency Management Agency's (FEMA) National Flood Hazard Layer mapping tool indicated there are no published flood maps for the project area. The project area is located at the base of a hill, outside of areas known, by the community, to have experienced flooding in the past (FEMA 2021).

9. Prime and Unique Farmland

There is no designated prime or unique farmland or farmland of statewide importance in Alaska. The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service has designated soils of local importance within parts of Alaska; however, none of these soils are located within the vicinity of the project area. The USDA's Web Soil Survey mapper does not have any soil data within the project area (USDA 2021 & USDA 2021a).

10. Soils and Geological Resources

The proposed tank farm is located at the base of the north facing slopes of the Askinuk Mountains, at the edge of the Kun River lowlands. Majority of the site is located over a closed landfill that has been capped with gravel. Although discontinuous permafrost may be present in the area, excavation of native soils is not anticipated. Therefore, impacts to permafrost and to existing soils is not anticipated (HDL 2020).

11. Invasive Species

The Alaska Exotic Plants Information Clearinghouse (AKEPIC) database did not identify invasive plants within the project area (within approximately 100 feet of proposed project activities) (AKEPIC 2021). The project will comply with EO 13112 (Invasive Species) by ensuring that ground disturbing activities are minimized, and disturbed areas are re-vegetated with seed recommended for the region by ADNR's *A Revegetation Manual for Alaska*.

12. Climate Change

The U.S. Environmental Protection Agency (EPA) measures climate change through the emission of greenhouse gases (GHG). The most common GHG is carbon dioxide (EPA 2021). Changes in existing carbon emissions associated with the proposed project are anticipated to be negligible. Potential temporary changes in carbon output are associated with the increased use of heavy equipment during construction to transport additional gravel material, construct the new tank farm, and decommission the existing tank farm. Permanent increases in carbon output is associated with the use of transport trucks hauling fuel during bulk resupply events. Currently, barges resupply fuel the community semi-annually during the summer months; an increase in barge trips specifically to support the project is not anticipated. Although permanent changes in carbon output are associated with the use of fuel trucks used to offload large quantities of fuel. The proposed tank farm will have larger fuel storage capacity. Due to the larger storage capacity at the new tank farm barge re-supply events will be reduced to

once a year. The increased use of fuel trucks during resupply events is estimated to be offset by the reduced the number of necessary barge resupply trips due to the increased storage capacity at the new tank farm.

13. Transportation

The proposed project will not have an appreciable impact to transportation infrastructure. The construction of the Proposed Action alternative would annually increase the amount of fuel transported by truck on community roads during barge offloading events. Using fuel trucks to refill existing storage tanks is already in practice at other facilities within the community and the existing roadways are capable of supporting fuel trucks for this type of use.

References

ADEC. 2021. Air Pollution in Alaska Communities. ADEC, Division of Air Quality. Accessed April 26, 2021. https://dec.alaska.gov/air/anpms/communities/.

ADF&G. 2021. Alaska Fish Resource Monitor. ADF&G, Division of Habitat. Accessed April 26, 2021. https://www.adfg.alaska.gov/sf/SARR/AWC/index.cfm?ADFG=main.interactive.

AKEPIC. 2021. AKEPIC Data Portal. AKEPIC. Accessed May 7, 2021. https://aknhp.uaa.alaska.edu/apps/akepic/#map?lg=f37ef462-d080-11e3-a36b-00219bfe5678&z=4&ll=60.00000%2C-140.00000.

EPA. 2021. Greenhouse Gas (GHG) Emissions. Accessed June 17, 2021. https://www.epa.gov/ghgemissions.

FEMA. 2021. FIRM Panel 02170C8130F. FEMA Map Service Center. Accessed May 7, 2021. https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-81.25933734271116,38.07177707113412,-59.98980609271681,46.20065555149157.

HDL. 2020. Geotechnical Engineering Report. Prepared for the Alaska Energy Authority. HDL Engineering Consultants, LLC. November 2020.

NWSRS. 2021. Alaska – National Wild and Scenic Rivers. Accessed April 26, 2021. https://www.rivers.gov/alaska.php.

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____. 2021a. Web Soil Survey. USDA Natural Resources Conservation Service Alaska. Accessed April 26, 2021. https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx.

USFWS. 2020. Coastal Barrier Resources System Mapper. USFWS. Accessed April 26, 2021. https://www.fws.gov/CBRA/Maps/Mapper.html.

APPENDIX C

Section 106 Consultation

Table of Contents

SHPO Section 106 Concurrence with Findings (July 6, 2021) C-1

SHPO Section 106 Finding Letter: No Historic Properties Affected (June 23, 2021) C-4

SHPO Section 106 Initiation of Consultation (May 19, 2021).....C-11

*Note: The Cultural Resources Desktop Assessment report has been removed and is available upon request.

Example Tribal Consultation Letter (May 19, 2021).....C-19

From: Ortiz, Liz M (DNR)
To: Brooke A. Therrien
Cc: Ortiz, Liz M (DNR); Price, William J (AEA); triopelle@aidea.org; David E. Cooper; Owen L. Means
Subject: RE: Scammon Bay Bulk Fuel Upgrades: Section 106 Findings Letter
Date: Tuesday, July 6, 2021 2:28:42 PM
Attachments: image001.png

3130-1R DC / 2021-00469

Good afternoon,

The Alaska State Historic Preservation Office (AK SHPO) received your correspondence (dated June 23, 2021) concerning the subject project on June 25, 2021. Following our review of the documentation provided, we concur with the finding of No Historic Properties Affected. Please note that our office may need to re-evaluate our concurrence if changes are made to the project's scope or design.

As stipulated in 36 CFR 800.3, other consulting parties such as the local government and Tribes are required to be notified of the undertaking. Additional information provided by the local government, Tribes, or other consulting parties may cause our office to re-evaluate our comments and recommendations. Please note that our response does not end the 30-day review period provided to other consulting parties.

Should unidentified archaeological resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register of Historic Places eligibility criteria (36 CFR 60.4), in consultation with our office. Please note that some sites can be deeply buried and that fossils are considered cultural resources subject to the Alaska Historic Preservation Act.

This email serves as our office's official correspondence for the purposes of Section 106. Thank you for the opportunity to review and comment. Please contact Liz Ortiz at 269-8722 or liz.ortiz@alaska.gov if you have any questions or we can be of further assistance.

Best,
Liz Ortiz

Archaeologist II - Review and Compliance
Alaska State Historic Preservation Office
Office of History and Archaeology
Department of Natural Resources
550 W. 7th Ave, Suite 1310
Anchorage AK, 99501
(907) 269-8722
liz.ortiz@alaska.gov
We are currently teleworking; email communication is best. Be well!

From: DNR, Parks OHA Review Compliance (DNR sponsored) <oha.revcomp@alaska.gov>
Sent: Friday, June 25, 2021 11:27 AM
To: Brooke A. Therrien <BTherrien@HDLAlaska.com>
Cc: Ortiz, Liz M (DNR) <liz.ortiz@alaska.gov>
Subject: FW: Scammon Bay Bulk Fuel Upgrades: Section 106 Findings Letter

Good morning,

The Office of History and Archaeology/Alaska State Historic Preservation Office received your documentation, and its review has been assigned to Liz Ortiz under 2021-00469. We may contact you if we require additional information. Our office ordinarily has 30 calendar days after receipt to complete our review, but our office has entered tolling in response to complications from COVID-19 and our review may be delayed as a result. Please contact the project reviewer or myself by email if you have any questions or concerns.

Best,
Sarah

Sarah Meitl
Review and Compliance Coordinator
Alaska State Historic Preservation Office
Office of History and Archaeology

550 West 7th Avenue, Suite 1310
Anchorage, AK 99501-3561
Direct: 907-269-8720
sarah.meitl@alaska.gov
http://dnr.alaska.gov/parks/oha
Teleworking - Email is the best method of communication.

From: Brooke A. Therrien <BTherrien@HDLAlaska.com>
Sent: Wednesday, June 23, 2021 12:57 PM
To: DNR, Parks OHA Review Compliance (DNR sponsored) <oha.revcomp@alaska.gov>; Ortiz, Liz M (DNR) <liz.ortiz@alaska.gov>
Cc: Price, William J (AEA) <wprice@akenergyauthority.org>; Tyde A. Riopelle <TRiopelle@aidea.org>; David E. Cooper <dcooper@hdlalaska.com>; Owen L. Means <omeans@hdlalaska.com>
Subject: Scammon Bay Bulk Fuel Upgrades: Section 106 Findings Letter

Hello,

HDL Engineering Consultants LLC. (HDL), on behalf of the Alaska Energy Authority and in cooperation with the Denali Commission is requesting concurrence with a finding of 'No Historic Properties Affected' for the replacement and relocation of a bulk fuel storage facility in Scammon Bay, Alaska.

The project is located within Section 10, Township 20 North, Range 90 West, Seward Meridian; and on U.S. Geological Survey Quadrangle Hooper Bay D-2.

Attached is a finding of effect letter as well as relevant project figures. Please feel free to contact myself or HDL's Project Manager, Dave Cooper, P.E., via email at dcooper@hdlalaska.com if you have any further questions or comments.

Sincerely,

Brooke Therrien,
Environmental Specialist
20 YEARS HDL ENGINEERING CONSULTANTS LLC
3335 Arctic Blvd, Suite 100 | Anchorage, Alaska 99503
main 907-564-2120 | direct 907-564-2159 | cell 907-538-4733
BTherrien@HDLAlaska.com | www.HDLAlaska.com

June 23, 2021

Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 West 7th Avenue, Suite 1310
Anchorage, Alaska 99510-3565
Emailed to: oha.revcomp@alaska.gov

Attention: This finding contains no DOE(s).

Re: Scammon Bay Bulk Fuel Upgrades
Section 106 of the National Historic Preservation Act 36 CFR 800.4(d)(1)
Request for Concurrence to Proceed with the Project
3130-1R DC / 2021-00469

Dear Ms. Bittner:

The Alaska Energy Authority (AEA), in cooperation with the Denali Commission, is proposing to replace and relocate the Askinuk Corporation's bulk fuel storage facility (tank farm) in Scammon Bay, Alaska. The project is located within Section 10 , Township 20 North, Range 90 West, Seward Meridian; on U.S. Geological Survey Quadrangle Hooper Bay D-2; and at Latitude 61.94112° North, Longitude 165.57184° West (Figure 1).

HDL Engineering Consultants, on behalf of AEA and the Denali Commission finds that no historic properties would be affected by the proposed project pursuant to 36 CFR 800.4(d)(1), implementing regulations of Section 106 of the National Historic Preservation Act (NHPA). This submission provides documentation in support of this finding, as required at 36 CFR 800.11(d). The Denali Commission has granted AEA and its representative, HDL Engineering Consultants, LLC, authority to conduct this review on their behalf. An email from Denali Commission delegating authority to consult on their behalf is available upon request.

Project Description

The Askinuk Corporation's existing tank farm is the sole retail fuel sales facility in the community. The facility is in poor condition, has inadequate containment, is located in the floodplain, and is threatened by ice flows on a yearly basis. The tanks, pumps, and piping are beyond their useful life and are severely corroded. The facility is not code-compliant and is a high risk for a fuel spill. A spill from a ruptured tank could overtop the damaged and settled sections of the secondary containment walls and reach navigable waters of the U.S. and detrimentally impact sensitive coastal wildlife habitat.

The purpose of the project is to provide a code-compliant tank farm with sufficient storage capacity to support the community's retail fuel needs and mitigate the risk of a major spill event. The proposed project will construct a new tank farm facility at the site of the old community landfill, approximately ½ mile east of the existing facility. The new facility includes the following components:

- Three 27,000-gallon diesel bulk fuel tanks
- Four 27,000-gallon gasoline bulk fuel tanks
- One 12,000-gallon dual product dispensing tank
- On-grade secondary containment structure with earthen/gravel berm
- Gravel pad foundation
- Dual product vehicle dispenser
- Small retail sales building
- Bulk fuel transfer station with fuel spill containment sump
- Bulk fuel transfer and vehicle dispensing distribution piping

Material Sites

Fill material for the project has been made available from a road-accessible quarry owned by the Askinuk Corporation approximately one mile southeast of the proposed tank farm site. The contractor will be required to secure all permits and clearances necessary for material and disposal sites used for the project. Material and disposal sites that have not received the appropriate permits and clearances will not be accepted for project construction.

Existing Tank Farm

The existing tank farm will be decommissioned. Work will be limited to removal and disposal of existing tanks, pipes, and related fuel storage and dispensing equipment. No ground disturbing work will occur at the site.

Site Access

Materials required for construction such and fuel tanks, piping, and building materials, and gravel surfacing material will arrive via airfreight or barge. Vehicles and heavy machinery used for construction will travel on existing gravel roadways within the community. Fill material will be transported from the material site to the new tank farm via existing roads. Staging for the proposed project will also occur on the existing landfill pad.

Fuel Hauling

Fuel is currently transported through the community from the existing barge landing to the school, located southeast of the project site. All transportation of fuel to the new tank farm will follow a similar path using existing roadways.

Proposed Tank Farm Location

The proposed project area is primarily located on top of a gravel cap that covers the old community landfill. A minor amount of fill may be placed over undisturbed wetlands beyond the existing gravel cap. Excavation of undisturbed ground is not anticipated.

Area of Potential Effect

The Area of Potential Effect (APE) for this project is shown on Figures 2 and 3. The direct APE at the proposed project site is comprised of the ground disturbance footprint as shown on Figure 2. The direct APE is approximately 2.1 acres. APE for indirect or visual impacts has been developed which includes residential homes adjacent to the project site. A site visit as well as review of aerial imagery determined these homes, adjacent to the proposed project site, have been constructed in the last 5 years.

Identification Efforts

Northern Land Use Research Alaska, LLC (NLURA) conducted an office-based cultural resources review titled, Scammon Bay Bulk Fuel Upgrade Project, *Cultural Resource Desktop Assessment, Scammon Bay, Alaska*, in October 2020. NLURA reviewed the Alaska Heritage Resource Survey (AHRS) database, the National Register of Historic Places database, as well as available cultural resources survey reports and consultation documents to identify cultural resources and historic properties with in the Study Area. NLURA identified six AHRS sites and one RS2477 trail within the study area. The AHRS database also indicated that 11 previous cultural resources investigation have been conduction with the project Study Area. The Study Area included a 3-mile (mi) buffer around a central point relative to the location of the Project's proposed components.

NLURA's review concluded there are no previously identified cultural resources or historic properties located within 800 feet of the direct project footprint at the proposed site. All other activities will occur on previously disturbed ground, which includes material hauling along existing roadways, decommissioning the existing tank farm, and obtaining gravel material from an existing material source.

Previous research and surveys have indicated that soil deposition and stratigraphic integrity of the sloped areas around Scammon Bay do not represent a high potential for archaeological resources. NLURA ranked the proposed project location as having a low potential to impact cultural resources and advised that construction activities be conducted under a project inadvertent discovery plan. A copy of NLURA's desktop assessment was submitted to SHPO on May 19, 2021, attached with the Section 106 initiation letter for this project.

Finding of Effect

AEA has determined the proposed project would have no effect on historic properties because there are no historic properties located within the APE.

Consultation Efforts

Interested parties that were contacted for project consultation included the Askinuk Corporation, Calista Corporation, and the Native Village of Scammon Bay. Two responses were received was received from Askinuk Corporation and the Native Village of Scammon Bay. The Askinuk Corporation confirmed the proposed project site is within an area Scammon Bay is developing for housing and future growth. Both entities also confirmed that there are no known places of traditional, religious, or cultural concern in the proposed project area.

We respectfully request your concurrence with our finding of No Historic Properties Affected. If you have any questions or comments related to the proposed project, contact me by phone at (907) 538-4733, or via email at btherrien@hdlalaska.com. Questions concerning the engineering aspects of the proposed project can be directed to David Cooper, P.E., Project Engineer at (907) 564-2161, or via email at dcooper@hdlalaska.com.

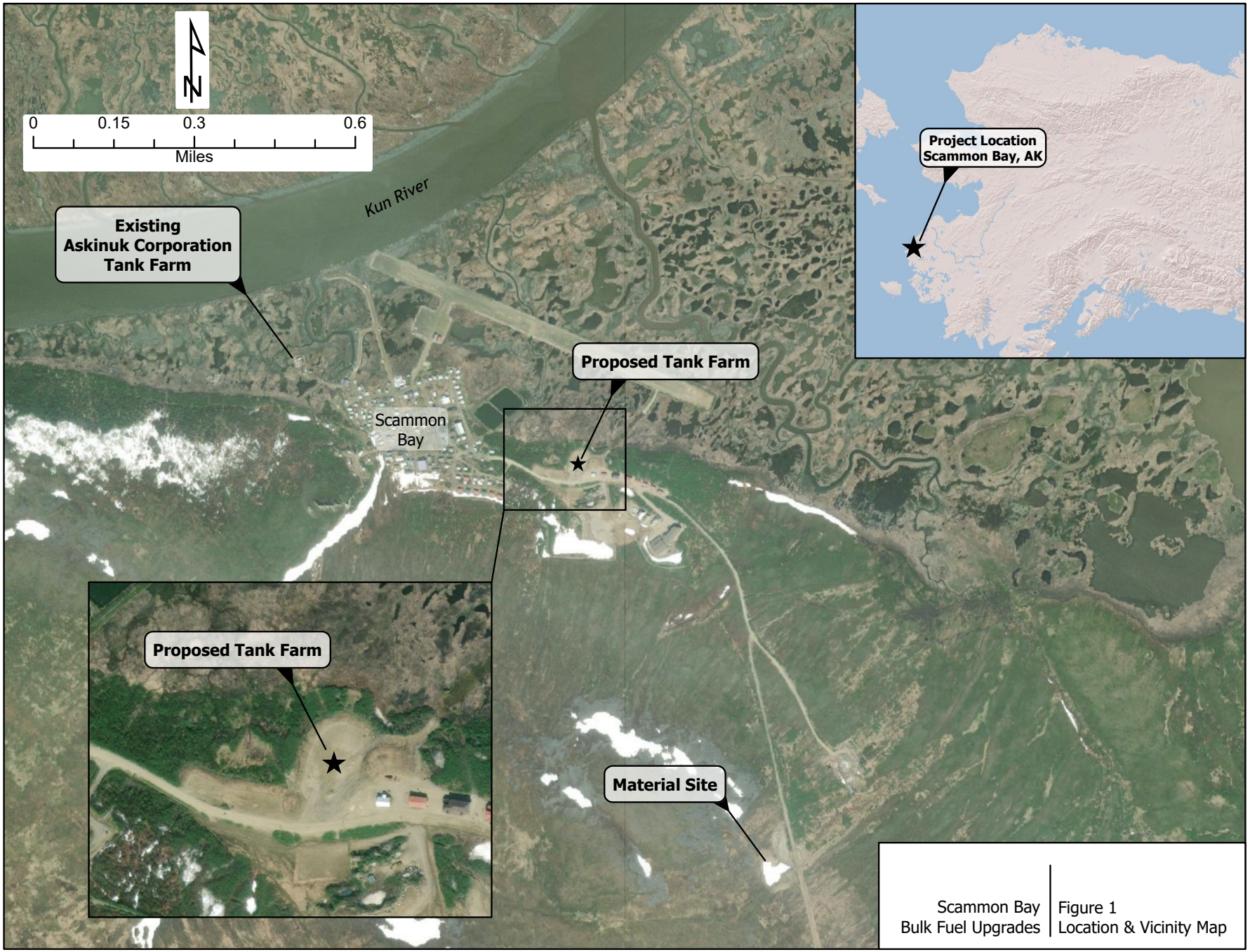
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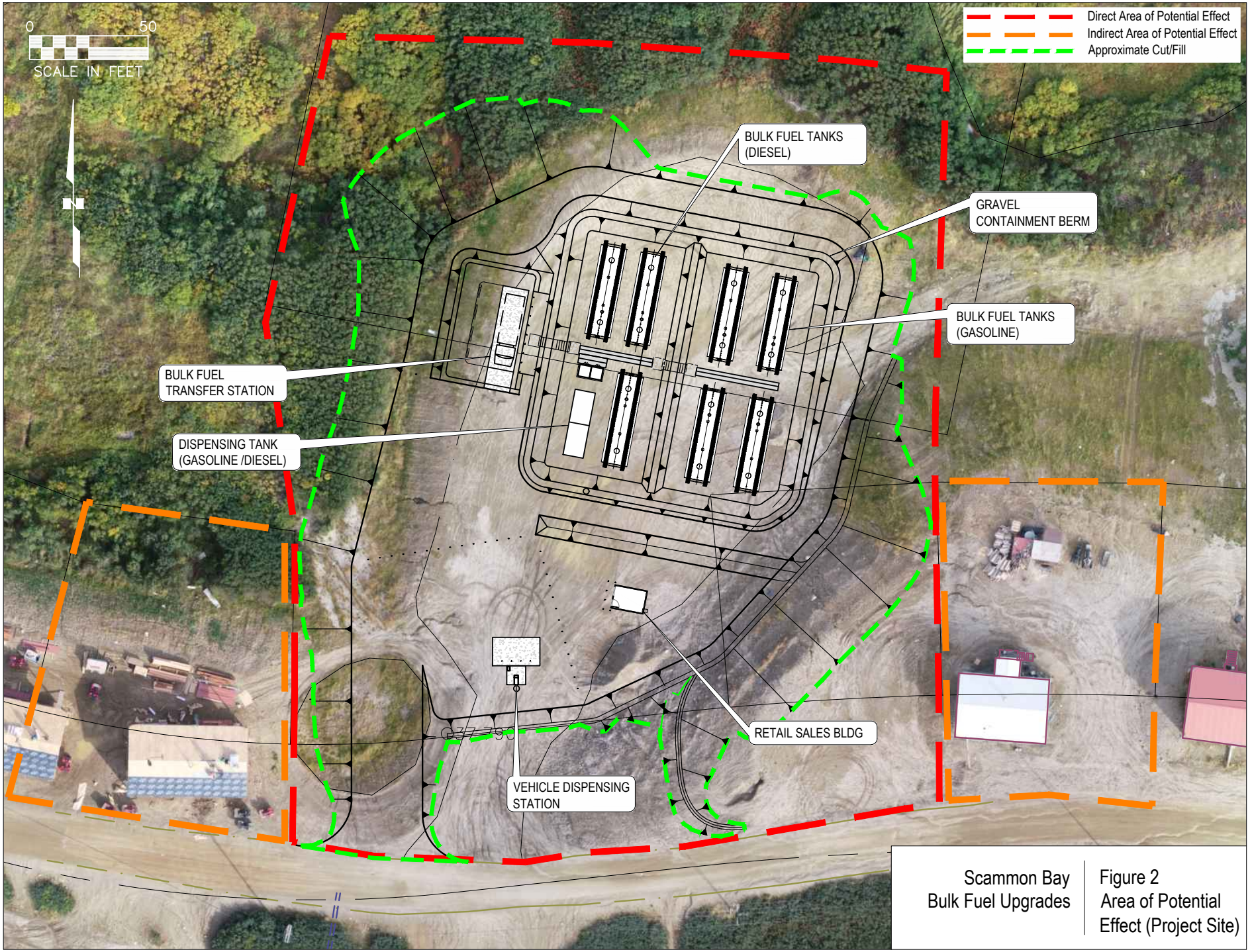
Brooke Therrien

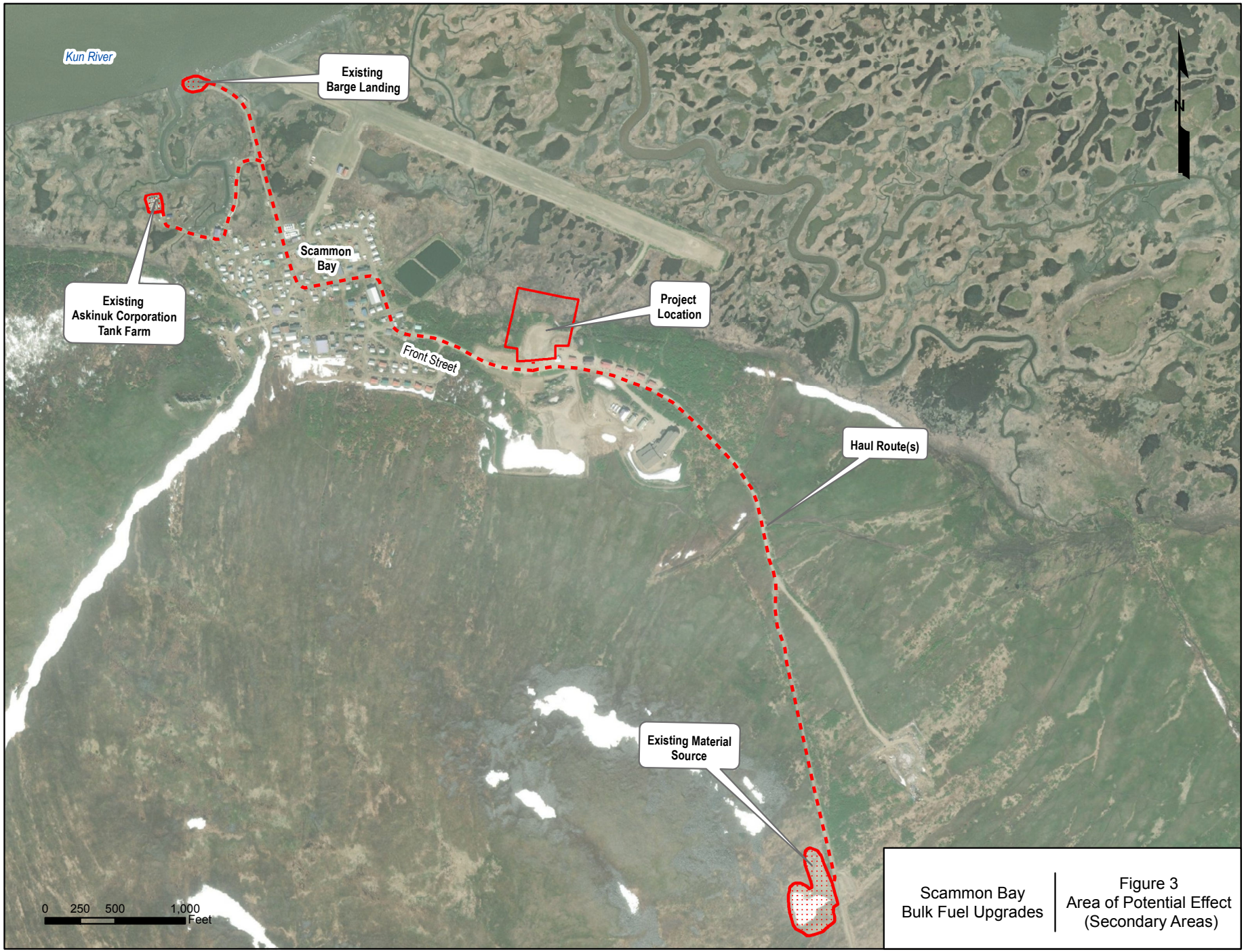
Brooke Therrien
Environmental Specialist

attach: Figure 1: Location and Vicinity Map
Figure 2: Area of Potential Effect (Project Site)
Figure 3: Area of Potential Effect (Secondary Sites)

cc: Bill Price, P.E., AEA Project Manager
Tyde Riopelle, P.E., AEA Project Manager
David Cooper, P.E., HDL Project Engineer


N
0
0.15
0.3
0.6
Miles
Kun River
Existing
Askinuk Corporation
Tank Farm
Scammon
Bay
Proposed Tank Farm
Project Location
Scammon Bay, AK
Proposed Tank Farm
Material Site
Scammon Bay
Bulk Fuel Upgrades
Figure 1
Location & Vicinity Map


0
50
SCALE IN FEET
N
Direct Area of Potential Effect
Indirect Area of Potential Effect
Approximate Cut/Fill
BULK FUEL TANKS (DIESEL)
GRAVEL CONTAINMENT BERM
BULK FUEL TANKS (GASOLINE)
BULK FUEL TRANSFER STATION
DISPENSING TANK (GASOLINE /DIESEL)
RETAIL SALES BLDG
VEHICLE DISPENSING STATION
Scammon Bay
Bulk Fuel Upgrades
Figure 2
Area of Potential Effect (Project Site)


Kun River
Existing Barge Landing
Scammon Bay
Existing Askinuk Corporation Tank Farm
Project Location
Front Street
Haul Route(s)
Existing Material Source
N
0 250 500 1,000 Feet
Scammon Bay Bulk Fuel Upgrades
Figure 3
Area of Potential Effect
(Secondary Areas)

May 19, 2021

Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 West 7th Avenue, Suite 1310
Anchorage, Alaska 99510-3565
Emailed to: oha.revcomp@alaska.gov

Re: Scammon Bay Bulk Fuel Upgrades
Initiation of Consultation under Section 106 of the National Historic Preservation Act
36 CFR 800.4(d)(1)

Dear Ms. Bittner:

The Alaska Energy Authority (AEA), in cooperation with the Denali Commission, is proposing to replace and relocate the Askinuk Corporation's bulk fuel storage facility (tank farm) in Scammon Bay, Alaska. The project is located within Section 10 , Township 20 North, Range 90 West, Seward Meridian; on U.S. Geological Survey Quadrangle Hooper Bay D-2; and at Latitude 61.94112° North, Longitude 165.57184° West (Figure 1).

For purposes of the National Historic Preservation Act, we are initiating this consultation with you to assist us in determining the Area of Potential Effect (APE) and identifying historic properties that may be affected by the proposed project. The Denali Commission has granted AEA and its representative, HDL Engineering Consultants, LLC, authority to conduct this review on their behalf. An email from Denali Commission delegating authority to consult on their behalf is attached.

Project Description

The Askinuk Corporation's existing tank farm is the sole retail fuel sales facility in the community. The facility is in poor condition, has inadequate containment, is located in the floodplain, and is threatened by ice flows on a yearly basis. The tanks, pumps, and piping are beyond their useful life and are severely corroded. The facility is not code-compliant and is a high risk for a fuel spill. A spill from a ruptured tank could overtop the damaged and settled sections of the secondary containment walls and reach navigable waters of the U.S. and detrimentally impact sensitive coastal wildlife habitat.

The purpose of the project is to provide a code-compliant tank farm with sufficient storage capacity to support the community's retail fuel needs and mitigate the risk of a major spill event. The proposed project will construct a new tank farm facility at the site of the old community landfill, approximately ½ mile east of the existing facility. The new facility includes the following components:

- Three 27,000-gallon diesel bulk fuel tanks
- Four 27,000-gallon gasoline bulk fuel tanks
- One 12,000-gallon dual product dispensing tank
- On-grade secondary containment structure with earthen/gravel berm
- Gravel pad foundation
- Dual product vehicle dispenser
- Small retail sales building
- Bulk fuel transfer truck with fuel spill containment sump
- Bulk Fuel transfer and vehicle dispensing distribution piping

Material Sites

Fill material for the project has been made available from a road-accessible quarry owned by the Askinuk Corporation approximately one mile southeast of the proposed tank farm site. The contractor will be required to secure all permits and clearances necessary for material and disposal sites used for the project. Material and disposal sites that have not received the appropriate permits and clearances will not be accepted for project construction.

Existing Tank Farm

The existing tank farm will be decommissioned. Work will be limited to removal and disposal of existing tanks, pipes, and related fuel storage and dispensing equipment. No ground disturbing work will occur at the site.

Site Access

Materials required for construction such and fuel tanks, piping, and building materials, and gravel surfacing material will arrive via airfreight or barge. Vehicles and heavy machinery used for construction will travel on existing gravel roadways within the community. Fill material will be transported from the material site to the new tank farm via existing roads. Staging for the proposed project will also occur on the existing landfill pad.

Fuel Hauling

Fuel is currently transported through the community from the existing barge landing to the school, located southeast of the project site. All transportation of fuel to the new tank farm will follow a similar path using existing roadways.

Proposed Tank Farm Location

The proposed project area is primarily located on top of a gravel cap that covers the old community landfill. A minor amount of fill may be placed over undisturbed wetlands beyond the existing gravel cap. Excavation of previously undisturbed ground is not anticipated.

Preliminary Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is shown on Figures 2 & 3. The direct APE at the proposed project site is comprised of the ground disturbance footprint as shown on Figure 2. The direct APE is approximately 2.1 acres. An APE for indirect or visual impacts has been developed which includes residential homes adjacent to the project site. A site visit as well as review of aerial imagery determined these homes, adjacent to the proposed project site, have been constructed in the last 5 years. A final APE will be defined once comments are received from your agency and other consulting parties.

Identification Efforts

Northern Land Use Research Alaska, LLC (NLURA) conducted an office-based cultural resources review titled, Scammon Bay Bulk Fuel Upgrade Project, *Cultural Resource Desktop Assessment, Scammon Bay, Alaska*, in October 2020. NLURA reviewed the Alaska Heritage Resource Survey (AHRS) database, the National Register of Historic Places database, as well as available cultural resources survey reports and consultation documents to identify cultural resources and historic properties with in the Study Area. NLURA identified six AHRS sites and one RS2477 trail within the study area. The AHRS database also indicated that 11 previous cultural resources investigation have been conduction with the project Study Area. The Study Area included a 3-mile (mi) buffer around a central point relative to the location of the Project's proposed components.

NLURA's review concluded there are no previously identified cultural resources or historic properties located within 800 feet of the direct project footprint at the proposed site. All other activities will occur on previously disturbed ground, which includes existing roadways, decommissioning the existing tank farm, and obtaining gravel material from an existing material source.

Previous research and surveys have indicated that soil deposition and stratigraphic integrity of the sloped areas around Scammon Bay do not represent a high potential for archaeological resources. NLURA ranked the proposed project location as having a low potential to impact cultural resources and advised that construction activities be conducted under a project inadvertent discovery plan. A copy of NLURA's desktop assessment is attached.

Consultation Efforts

Parties that are being contacted for project consultation include Askinuk Corporation, Calista Corporation, and the Native Village of Scammon Bay.

If you have any questions or comments related to the proposed project, contact me by phone at (907) 538-4733, or via email at btherrien@hdlalaska.com. Questions concerning the engineering aspects of the proposed project can be directed to David Cooper, P.E., Project Engineer at (907) 564-2161, or via email at dcooper@hdlalaska.com.

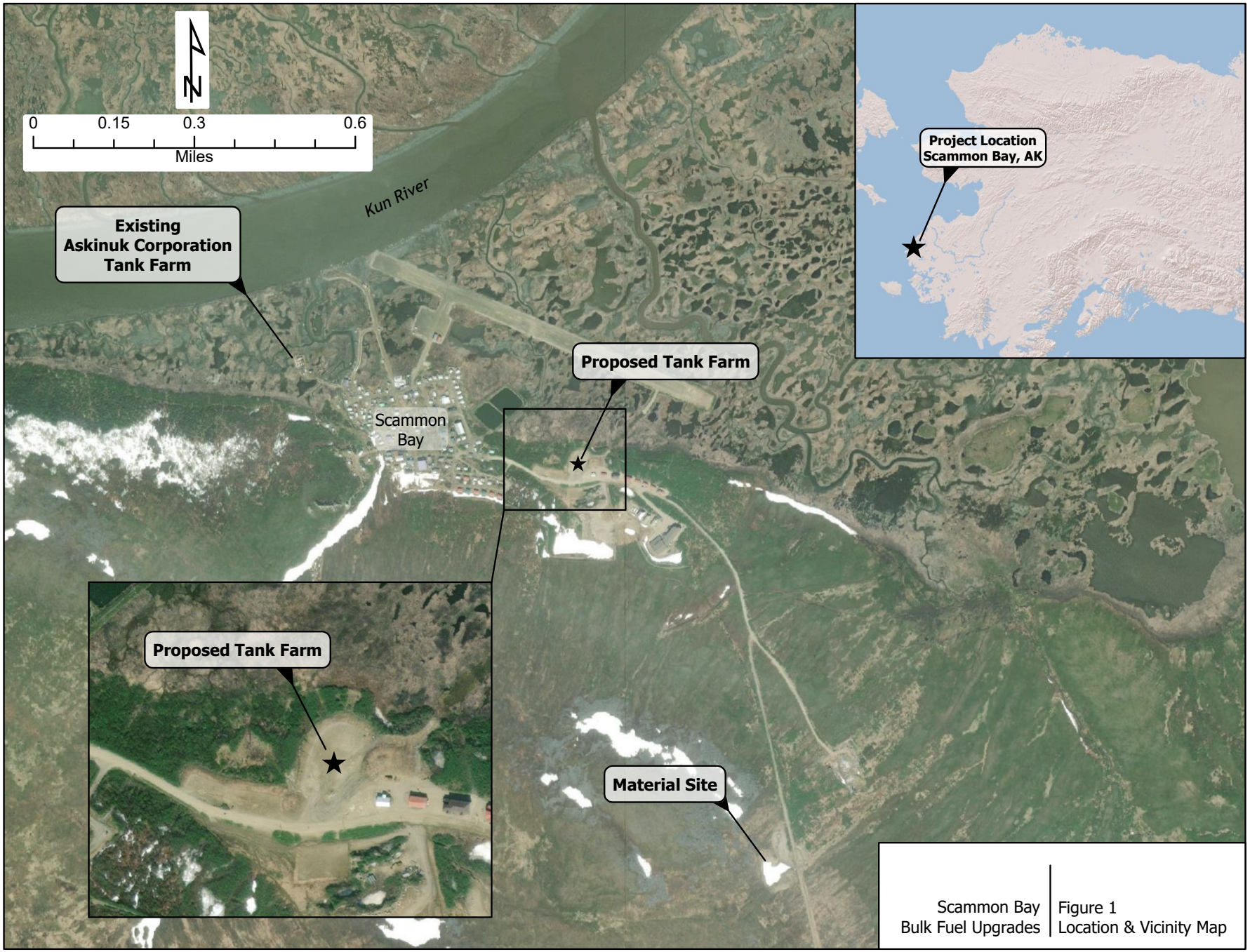
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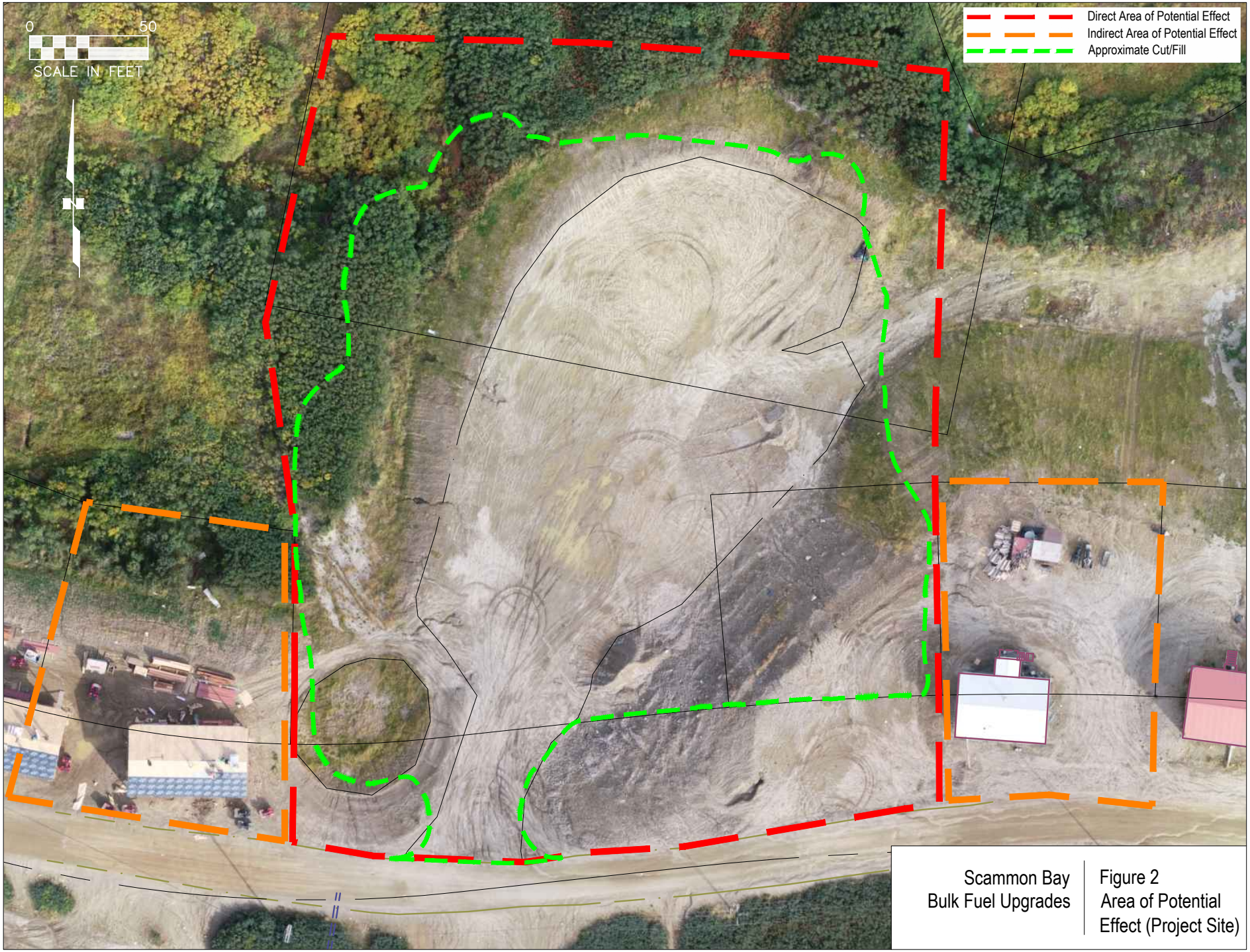
Brooke Therrien

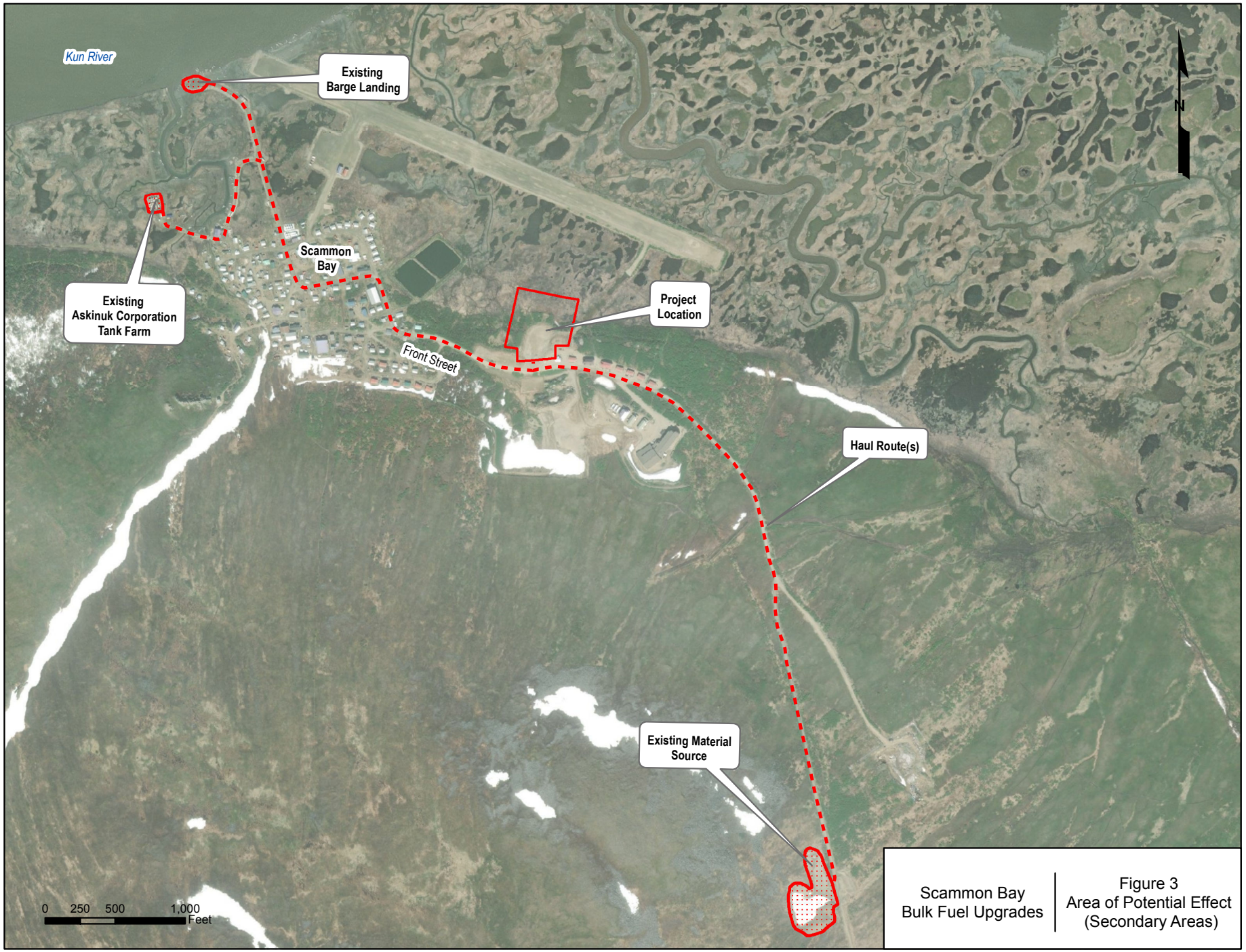
Brooke Therrien
Environmental Specialist

attach: Figure 1: Location and Vicinity Map
Figure 2: Area of Potential Effect (Project Footprint)
Figure 3: Area of Potential Effect (Secondary Sites)
Denali Commission Email, Delegation of Authority
Scammon Bay Bulk Fuel Upgrade Project, Cultural Resources Desktop Assessment

cc: Bill Price, P.E., AEA Project Manager
David Cooper. P.E., HDL Project Engineer


N
0
0.15
0.3
0.6
Miles
Kun River
Existing
Askinuk Corporation
Tank Farm
Scammon
Bay
Proposed Tank Farm
Project Location
Scammon Bay, AK
Proposed Tank Farm
Material Site
Scammon Bay
Bulk Fuel Upgrades
Figure 1
Location & Vicinity Map


0
50
SCALE IN FEET
N
Direct Area of Potential Effect
Indirect Area of Potential Effect
Approximate Cut/Fill
Scammon Bay
Bulk Fuel Upgrades
Figure 2
Area of Potential
Effect (Project Site)


Kun River
Existing Barge Landing
Scammon Bay
Existing Askinuk Corporation Tank Farm
Project Location
Front Street
Haul Route(s)
Existing Material Source
N
0 250 500 1,000 Feet
Scammon Bay Bulk Fuel Upgrades
Figure 3
Area of Potential Effect
(Secondary Areas)

From:	William (Bill) Price
To:	Brooke A. Therrien
Subject:	FW: [External Outside Email] Scammon Bay BFU
Date:	Friday, October 30, 2020 2:21:35 PM

Brooke,

See below

From: Thomas Wolf <twolf@denali.gov>
Sent: Friday, October 30, 2020 2:12 PM
To: William (Bill) Price <WPrice@akenergyauthority.org>
Subject: [External Outside Email] Scammon Bay BFU

Bill - This email is to convey that the Denali Commission is delegating the authority to consult with Alaska's State Historic Preservation Office under Section 106 of the National Historic Preservation Act for the Scammon Bay Bulk Fuel Upgrade Project to the consulting firm HDL Engineering Consultants LLC, a representative of the Alaska Energy Authority.

Thanks,

Tom

Thomas S. Wolf, P.E., PMP
Program Manager
Denali Commission
510 L Street, Suite 410
Anchorage, AK 99501

Phone: 907-271-1414
Direct: 907-271-5232
Fax: 907-271-1415

May 19, 2021

Brandon Aguchak
Tribal Administrator
Native Village of Scammon Bay
P.O. Box 89
Scammon Bay, Alaska 99662
Emailed to: Brandon.nvsb@gmail.com

Re: Scammon Bay Bulk Fuel Upgrades
Section 106 of the National Historic Preservation Act 36 CFR 800.4(d)(1)

Dear Mr. Aguchak:

The Alaska Energy Authority (AEA), in cooperation with the Denali Commission, is proposing to replace and relocate the Askinuk Corporation's bulk fuel storage facility (tank farm) in Scammon Bay, Alaska. The project is located within Section 10 , Township 20 North, Range 90 West, Seward Meridian; on U.S. Geological Survey Quadrangle Hooper Bay D-2; and at Latitude 61.94112° North, Longitude 165.57184° West (Figure 1).

For the purposes of the National Historic Preservation Act, we are initiating formal consultation with you to assist us in identifying places that may be of traditional religious or cultural importance to your organization. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We would be pleased to discuss with you any confidential areas of concern you may identify and discuss project details.

Project Description

The Askinuk Corporation's existing tank farm is the sole retail fuel sales facility in the community. The facility is in poor condition, has inadequate containment, is located in the floodplain, and is threatened by ice flows on a yearly basis. The tanks, pumps, and piping are beyond their useful life and are severely corroded. The facility is not code-compliant and is a high risk for a fuel spill. A spill from a ruptured tank could overtop the damaged and settled sections of the secondary containment walls and reach navigable waters of the U.S. and detrimentally impact sensitive coastal wildlife habitat.

The purpose of the project is to provide a code-compliant tank farm with sufficient storage capacity to support the community's retail fuel needs and mitigate the risk of a major spill event. The proposed project will construct a new tank farm facility at the site of the old community landfill, approximately ½ mile east of the existing facility. The new facility includes the following components:

- Three 27,000-gallon diesel bulk fuel tanks
- Four 27,000-gallon gasoline bulk fuel tanks
- One 12,000-gallon dual product dispensing tank
- On-grade secondary containment structure with earthen/gravel berm
- Gravel pad foundation
- Dual product vehicle dispenser
- Small retail sales building
- Bulk fuel transfer truck with fuel spill containment sump
- Bulk Fuel transfer and vehicle dispensing distribution piping

Material Sites

Fill material for the project has been made available from a road-accessible quarry owned by the Askinuk Corporation approximately one mile southeast of the proposed tank farm site. The contractor will be required to secure all permits and clearances necessary for material and disposal sites used for the project. Material and disposal sites that have not received the appropriate permits and clearances will not be accepted for project construction.

Existing Tank Farm

The existing tank farm will be decommissioned. Work will be limited to removal and disposal of existing tanks, pipes, and related fuel storage and dispensing equipment. No ground disturbing work will occur at the site.

Site Access

Materials required for construction such and fuel tanks, piping, and building materials, and gravel surfacing material will arrive via airfreight or barge. Vehicles and heavy machinery used for construction will travel on existing gravel roadways within the community. Fill material will be transported from the material site to the new tank farm via existing roads. Staging for the proposed project will also occur on the existing landfill pad.

Fuel Hauling

Fuel is currently transported through the community from the existing barge landing to the school, located southeast of the project site. All transportation of fuel to the new tank farm will follow a similar path using existing roadways.

Proposed Tank Farm Location

The proposed project area is primarily located on top of a gravel cap that covers the old community landfill. A minor amount of fill may be placed over undisturbed wetlands beyond the existing gravel cap. Excavation of previously undisturbed ground is not anticipated.

Preliminary Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is shown on Figures 2 & 3. The direct APE at the proposed project site is comprised of the ground disturbance footprint as shown on Figure 2. The direct APE is approximately 2.1 acres. An APE for indirect or visual impacts has been developed which includes residential homes adjacent to the project site. A site visit as well as review of aerial imagery determined these homes, adjacent to the proposed project site, have been constructed in the last 5 years. A final APE will be defined once comments are received from the consulting parties.

Identification Efforts

Northern Land Use Research Alaska, LLC (NLURA) conducted an office-based cultural resources review titled, Scammon Bay Bulk Fuel Upgrade Project, *Cultural Resource Desktop Assessment, Scammon Bay, Alaska*, in October 2020. NLURA reviewed the Alaska Heritage Resource Survey (AHRS) database, the National Register of Historic Places database, as well as available cultural resources survey reports and consultation documents to identify cultural resources and historic properties with in the Study Area. NLURA identified six AHRS sites and one RS2477 trail within the study area. The AHRS database also indicated that 11 previous cultural resources investigation have been conduction with the project Study Area. The Study Area included a 3-mile (mi) buffer around a central point relative to the location of the Project's proposed components.

NLURA's review concluded there are no previously identified cultural resources or historic properties located within 800 feet of the direct project footprint at the proposed site. All other activities will occur on previously disturbed ground, which includes existing roadways, decommissioning the existing tank farm, and obtaining gravel material from an existing material source.

Previous research and surveys have indicated that soil deposition and stratigraphic integrity of the sloped areas around Scammon Bay do not represent a high potential for archaeological resources. NLURA ranked the proposed project location as having a low potential to impact cultural resources and advised that construction activities be conducted under a project inadvertent discovery plan.

Consultation Efforts

Parties that are being contacted for project consultation include the State Historic Preservation Office, Askinuk Corporation, Calista Corporation, and the Native Village of Scammon Bay.

If you have any questions or comments related to the proposed project, contact me by phone at (907) 538-4733, or via email at btherrien@hdlalaska.com. Questions concerning the engineering aspects of the proposed project can be directed to David Cooper, P.E., Project Engineer at (907) 564-2161, or via email at dcooper@hdlalaska.com. Should you prefer to conduct government-to-government consultation directly with Denali Commission on this project, please complete the attached Project Consultation Options form to advise me of your preference.

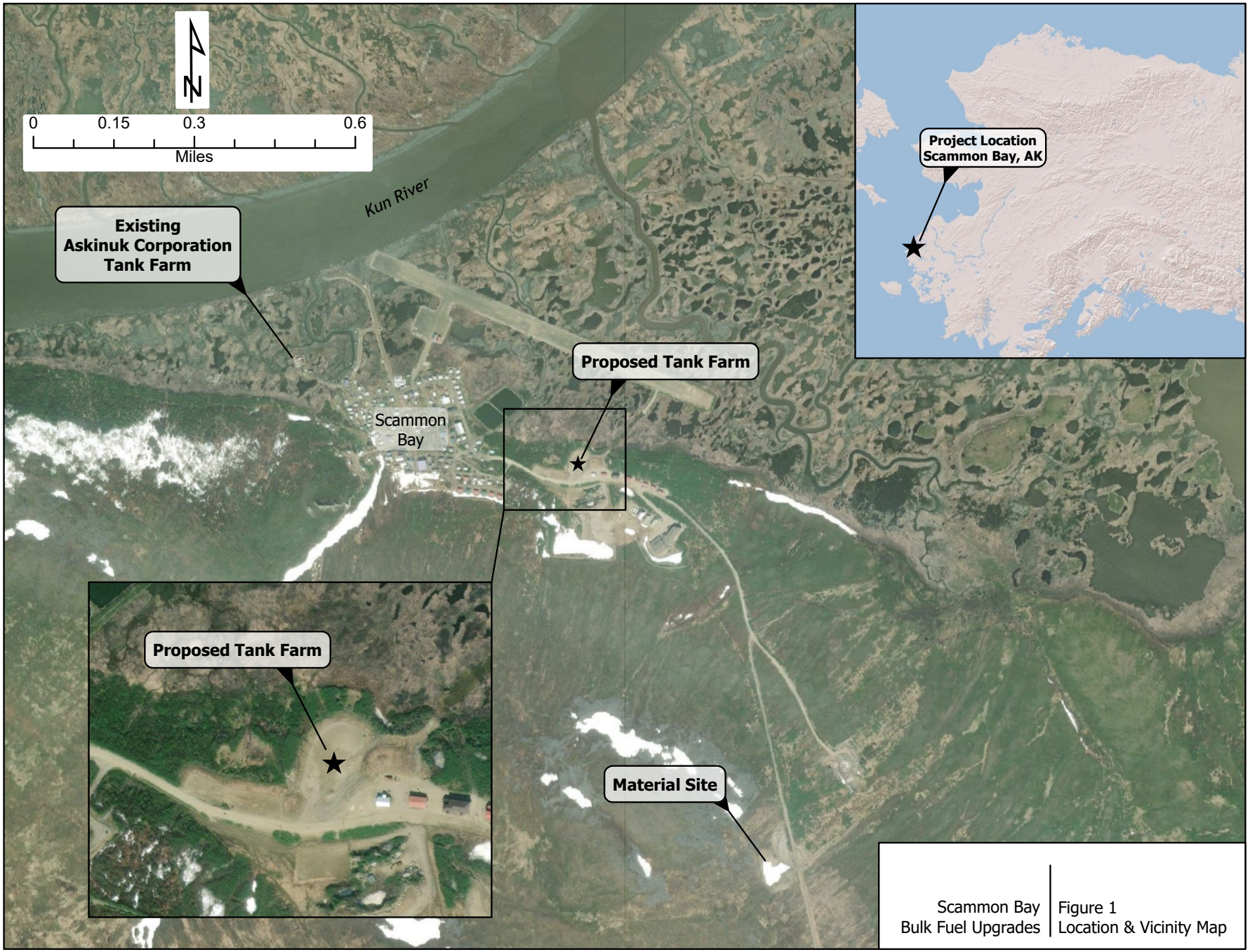
Sincerely,

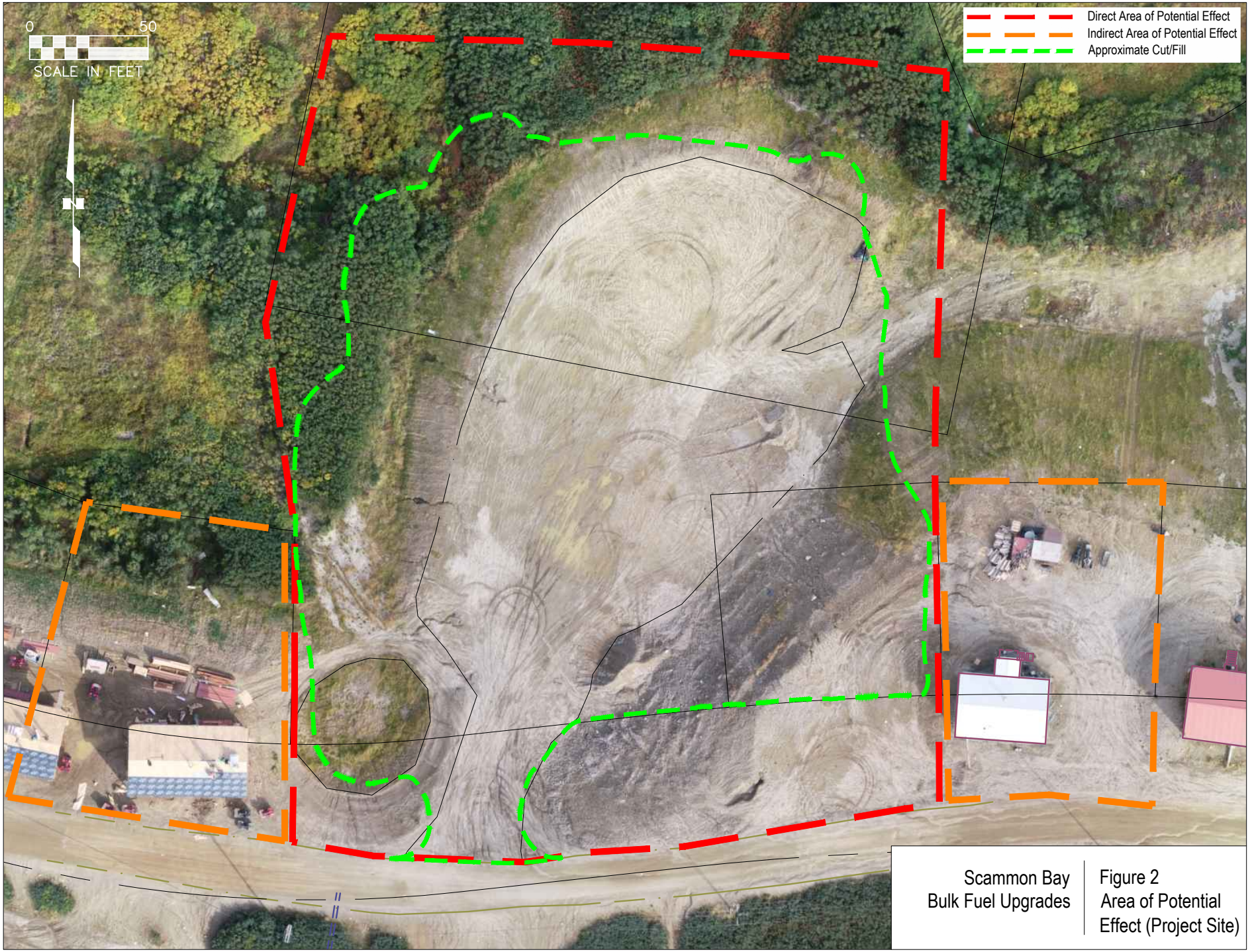
Brooke Therrien

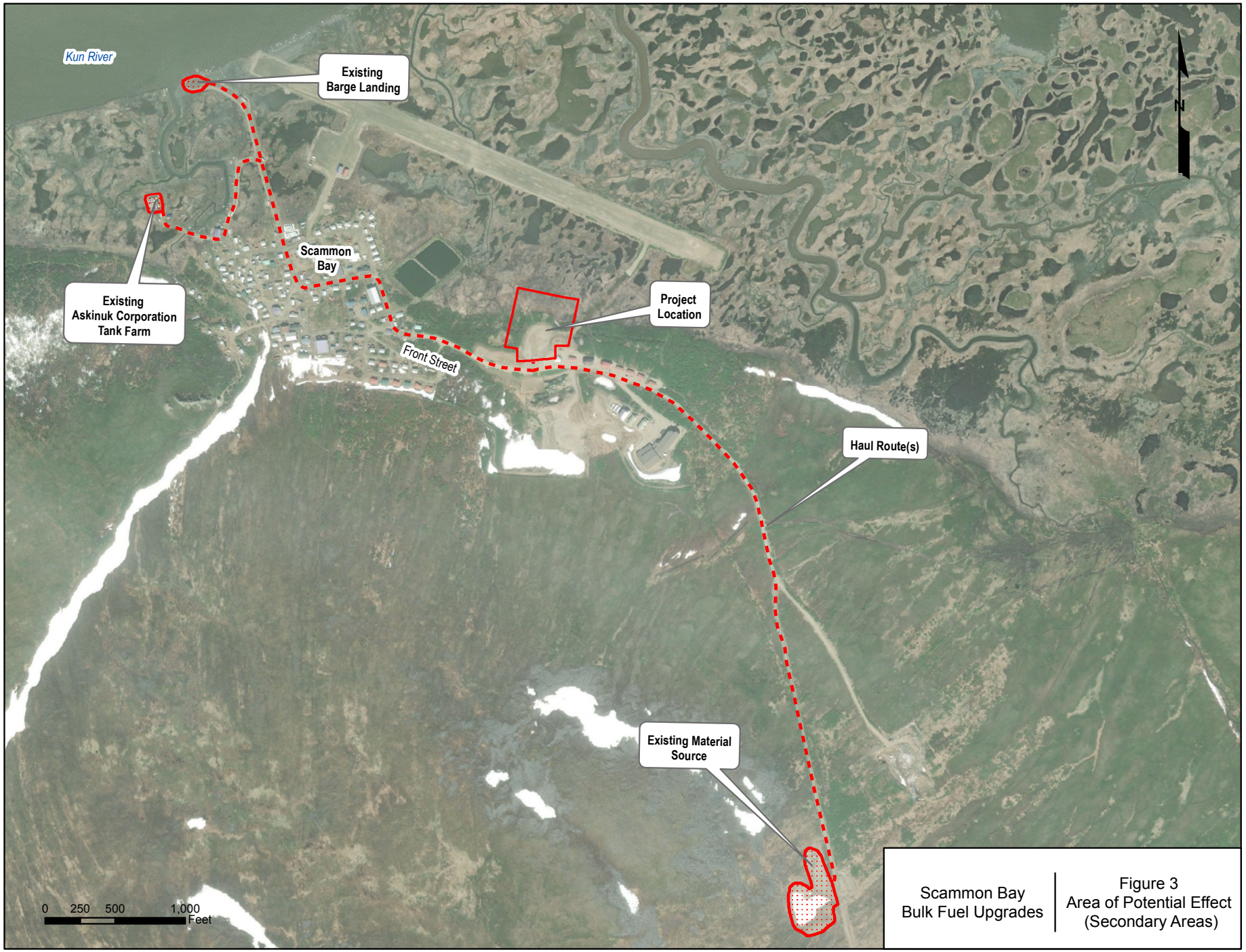
Brooke Therrien
Environmental Specialist

attach: Figure 1: Location and Vicinity Map
Figure 2: Area of Potential Effect (Project Footprint)
Figure 3: Area of Potential Effect (Secondary Sites)
Project Consultation Options

cc: Bill Price, P.E., AEA Project Manager
David Cooper. P.E., HDL Project Engineer


N
0
0.15
0.3
0.6
Miles
Kun River
Existing
Askinuk Corporation
Tank Farm
Scammon
Bay
Proposed Tank Farm
Project Location
Scammon Bay, AK
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Front Street
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Existing Material Source
N
0 250 500 1,000 Feet
Scammon Bay Bulk Fuel Upgrades
Figure 3
Area of Potential Effect
(Secondary Areas)

Project Consultation Options

Native Village of Scammon Bay

Project Name: **Scammon Bay Bulk Fuel Upgrades**

I. Please check the appropriate response(s) from the list below and use the back of this form or additional sheets if you wish to make comments:

____ There are no known places of traditional religious or cultural importance present or within the vicinity of the proposed project and further consultation is not requested.

____ There are or may be places of traditional religious or cultural importance present or within the vicinity of the proposed project and further consultation is requested (*select one*):

____ We will continue consultations for this proposed project directly with either of the entities listed below with the understanding that we may at our discretion request consultations directly with the Denali Commission.

Bill Price, P.E., Project Manager
Alaska Energy Authority
wprice@akenergyauthoirty.org
(907) 771-3027

Owen Means, Environmental Specialist
HDL Engineering Consultants, LLC
OMeans@HDLAlaska.com
(907) 564-2143

____ We prefer to consult directly with the Denali Commission on this project.

____ We have no interest associated with this proposed project and further consultation is not required.

II. If you have chosen to consult, please indicate the manner(s) in which you wish to continue consultation, and your preferred contact person for this project:

Name of our designated contact person for this proposed project:

_____
(Please print)

We would like to continue consultation via:

☐ Phone ☐ Fax ☐ Mail ☐ E-mail ☐ Other: (please describe) _____

If you prefer consultation by phone, fax, email, or a different mailing address than was used on this letter, please provide that contact information here:

_____
_____

III. Signed: _____ Date: _____
[Name and title of formal Tribal representative]

Please mail (or email) to:
Owen Means, Environmental Specialist,
OMeans@HDLAlaska.com
3335 Arctic Blvd, Anchorage AK 99503

Or, fax to: **Owen Means, (907) 564-2122**

APPENDIX D

Wetland Delineation

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Wetland Delineation (December 2020) D-1

Wetland Delineation

for

Scammon Bay Bulk Fuel Upgrades
Scammon Bay, Alaska

Prepared for:



813 W. Northern Lights Blvd.
Anchorage, Alaska

Prepared by:

HDL Engineering Consultants, LLC
3335 Arctic Blvd., Ste. 100
Anchorage, AK 99503
Phone: 907.564.2020
Fax: 907.564.2122

December 2020

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ABBREVIATIONS

ADF&G .....Alaska Department of Fish and Game
CWA .....Clean Water Act
FAC ..... Facultative neutral plants
FACW .....Facultative wetland plants
FACU.....Facultative upland plants
FGDC .....Federal Geographic Data Committee
HDL .....HDL Engineering Consultants, LLC
NWI..... National Wetland Inventory
OBL .....Obligate wetland plants
U.S..... United States
USACE ..... U.S. Army Corps of Engineers
USEPA .....U.S. Environmental Protection Agency
USGS ..... U.S. Geological Survey

1.0 INTRODUCTION

HDL Engineering Consultants, LLC (HDL) is under contract with the Alaska Energy Authority to perform a wetland delineation at a 4.5 acre parcel of land (study area) located on Front Street Scammon Bay, Alaska (Figure 1). The study area is comprised of undeveloped land and a gravel cap that covers an old community landfill. The approximate center of the study area is located at latitude 61.94112°N and longitude 165.57184°W and is within U.S. Geological Survey (USGS) Quadrangle *Hooper Bay D-2*.

The work performed for this wetland delineation includes field wetland determinations, classification and mapping of wetlands and waterbodies, and a preliminary jurisdictional determination. This report was prepared following the guidelines for jurisdictional determination reports contained in U.S. Army Corps of Engineers (USACE) , Alaska District Special Public Notice 2020-00399 (USACE 2020).

The USACE defines wetlands as “areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (USACE 1987).

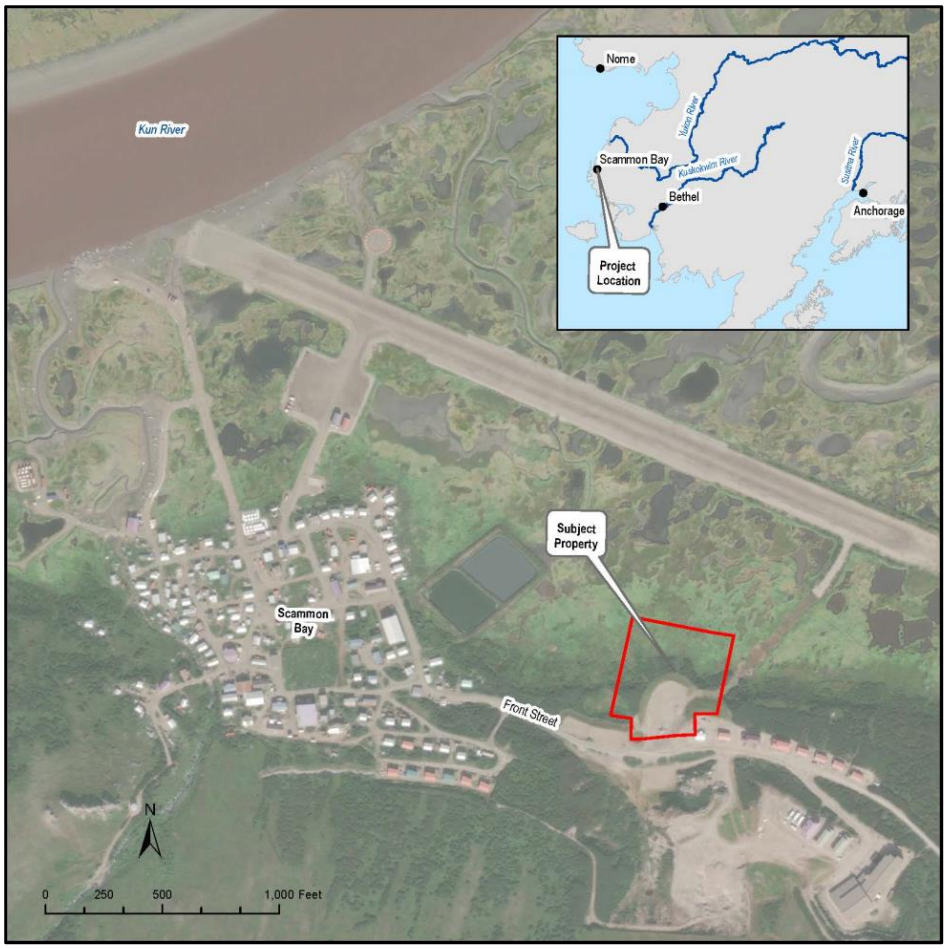


Figure 1: Project Location

The study area is located in the Yukon-Kuskokwim Coastal Plains ecological subregion (Natural Resources Conservation Service [NRCS] 2006). Terrain consists of a level to rolling delta plain along the lower reaches of the Yukon and Kuskokwim Rivers. In a few areas, isolated low hills protrude above the surrounding plain. Depressions and shallow basins on the plain are dotted with interconnecting stream channels, wetlands, and thousands of small and medium-size lakes. Vegetation near these bodies of water includes wet sedge meadows, sedge-shrub meadows, and sedge-moss meadows. Sites with better drainage and higher local relief support low ericaceous scrub with mosses, lichens, low willows, grasses, and forbs. Typical upland vegetation communities are comprised of white spruce, black spruce, willow, alder (NRCS 2006).

The average annual temperature is 29 to 33° Fahrenheit (F) with the freeze-free period averaging about 80 to 135 days. Average annual precipitation ranges from 15-30 inches per year while the average annual snowfall ranges from 40- 90 inches. Summers are short and variable while winters are long and cold. This area is in the zone of discontinuous permafrost. The layer of permafrost is thin or moderately thick and occurs primarily in fine textured deposits (NRCS 2006). The study area lies entirely within the Kun River watershed.

2.0 METHODS

Methodology used for this wetlands delineation is based on both a site visit as well as using "desktop" delineation methods. Sources of environmental data and other geographic information used to map wetlands and evaluate jurisdiction included the following:

- 2020 aerial imagery procured for the project via aerial drone survey.
- Alaska Department of Fish and Game (ADF&G) Anadromous Waters Catalog (ADF&G 2020).
- USGS Quadrangle *Hooper Bay D-2*.

2.1 Field Survey

HDL wetland scientist, Owen Means, conducted a field study on June 29, 2020, and determined wetland status at two sampling point locations. Information was collected on vegetation communities, soil characteristics, and hydrological conditions to support wetland determinations at the sites. Wetland determinations followed the three-parameter approach described in the *USACE Wetlands Delineation Manual* (USACE 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Alaska Region, Version 2.0* (USACE 2007).

2.2 Habitat Classification and Wetland Mapping

Wetland habitats were classified according to the Cowardin Classification System (Federal Geographic Data Committee [FGDC] 2013), which is also the classification scheme used by the National Wetland Inventory (NWI). An evaluation of each habitat's landscape position, local geomorphology, plant community composition and structure, bottom substrate, and general hydrology characteristics provided information needed to determine the classification of each habitat. Palustrine habitats were classified to the subclass level. Water regime and special modifier codes were applied to all habitats where applicable following the code definitions in FGDC 2013 and the NWI Wetlands and Deepwater Map Code Diagram (NWI 2015).

Wetland boundaries were drawn based on wetland determinations and observations made at the site. Wetland boundaries were then extrapolated to the remainder of the wetland or wetland complex within the study area by interpreting color signature, visible water patterns, and topographic relief from 2020 aerial imagery. Wetland map polygons were drawn digitally and their acreages were calculated in ArcGIS.

2.3 Preliminary Jurisdictional Determination

Wetlands identified in the study area during the field study were preliminarily evaluated for jurisdiction under Section 404 of the Clean Water Act (CWA). The evaluation was performed in accordance with the U.S. Environmental Protection Agency (USEPA) Navigable Waters Protection Rule: Definition of "Waters of the United States" under Code of Federal Regulations, Title 33, Part 328. This rule finalizes and defines the scope of waters federally regulated in the CWA (USEPA 2020).

3.0 FIELD OBSERVATIONS

3.1 Ground Disturbance

The study area is comprised of both disturbed and undisturbed land. Disturbed areas within the study area consist of a gravel cap placed over an old community landfill, and landfill embankment slope that have been re-colonized by alders.

3.2 Vegetation

Indicators of hydrophytic vegetation are the dominance or prevalence of plant species rated as obligate wetland plants (OBL), facultative wetland plants (FACW), and/or facultative plants (FAC). Plant species rated as facultative upland plants (FACU) or upland (U) are typically not present or are present in low cover values in wetlands.

Sampling point 2 exhibited hydrophytic vegetation was comprised of a persistent emergent plant community dominated by herbaceous species, including Northwest Territory sedge (*Carex utriculata* [OBL]), leafy tussock sedge (*Carex aquatilis* [OBL]), and marsh cinquefoil (*Comarum palustre*) [OBL]).

Vegetated uplands within the study area were relatively flat or sloped and dominated by spreading wood fern (*Dryopteris expansa* [FACU]) narrowleaf fireweed (*Chamaenerion angustifolium* [FACU]), Bluejoint (*Calamagrostis Canadensis* [FAC]), and some areas of dense alder (*Alnus incana*)

3.3 Soil

Indicators of hydric soil are physical or chemical conditions that occur when a soil experiences saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part of the soil profile (U.S. Department of Agriculture 1994). Soils were not observed at either site due to the presence of densely compacted fill material and trash (sampling point 1) or standing water (sampling point 2). Indicator A4 (hydrogen sulfide) was observed as the main hydric soil indicator in wetlands at sampling point 2.

3.4 Hydrology

Indicators of wetland hydrology are intended to reflect a site's medium- to long-term hydrological history (USACE 2007). Surface water and inundation was visible on 2020 aerial imagery in the flat, lowland areas below the embankment toe-of-slope where wetlands were identified. Indicator A1 (surface water) and C1 (hydrogen sulfide odor) observed.

Wetlands data, photos, and observations recorded in the field for each sampling point are included in data forms located in Appendix A.

4.0 RESULTS AND DISCUSSION

4.1 Wetland Habitat Classification

Emergent Wetland

Emergent wetland habitats are mesic (i.e. moderate moisture regmine) to wet marshes containing primarily herbaceous vegetation. Species found dominating these habitats in the study area were Northwest Territory sedge (*Carex utriculata*), leafy tussock sedge (*Carex aquatilis*), and marsh cinquefoil (*Comarum palustre*). These habitats exhibited standing water anywhere from 1-6 inches in depth. They were found in the undeveloped areas surrounding the landfill embankment.

4.2 Preliminary Jurisdictional Determination

Wetlands in the study area have a direct connection to down-gradient wetlands that eventually discharge into the Kun River, and ultimately the Bering Sea. Due to the wetland or surface water connection to the Bering Sea, all of the wetlands and waters mapped within the study area are subject to USACE's jurisdiction under Section 404 of the CWA.

4.3 Mapping Summary

The study area for this report was 4.5 acres in size. The total area of jurisdictional wetlands within the study area is 1.90 acres, comprising 42.2 percent of the study area. There are no waterbodies within the study area that are classified as Lacustrine (lake) or Riverine (streams). The remaining 2.60 acres are non-jurisdictional uplands comprised of developed land. A summary of wetland habitat acreage is shown in Table 1.

Table 1: Summary of Jurisdictional Waters, Uplands, and Habitat Types

Cowardin/NWI Classification		Associated Field Sampling Points	Acres	
Subsystem or Class	**Code**			
Wetlands - Palustrine				
Emergent	PEM1H	2	1.90	ac
Upland				
Upland	U	1	2.60	ac
Summary				
		Total Jurisdictional Wetlands:	1.90	
		Total Study Area Acreage:	4.50	ac
		Percent of Study Area that is Wetlands:	42.2	%
		Percent of Study Area that is Uplands:	58.8	%

Final wetland mapping in Appendix B contains the locations of sampling points and the delineated wetland/upland boundary.

5.0 CONSLUSION AND SUMMARY

This report was prepared following the guidelines for jurisdictional determination reports contained in USACE Alaska District's Special Public Notice 2020-00399. Wetland determinations were performed in accordance with the USACE Wetlands Delineation Manual and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Alaska Region, Version 2.0.

HDL wetland scientist, Owen Means, conducted a field survey of the study area on June 29, 2020. Wetlands data and observations were collected at two sampling points. Following the field survey, wetlands were mapped in ArcGIS and analyzed for their jurisdictional status under the CWA.

The total acreage of jurisdictional wetlands mapped within the study area is 1.90 acres. This report is considered preliminary until verified or modified by USACE in a formal Jurisdictional Determination.

6.0 REFERENCES

ADF&G. 2020. [Atlas to] Catalog of Waters Important for the Spawning, Rearing or Migration of Anadromous Fishes (Anadromous Waters Catalog). Revised June 1, 2020. <http://www.adfg.alaska.gov/sf/SARR/AWC/index.cfm?ADFG=maps.maps>.

FGDC. 2013. Classification of Wetlands and Deepwater habitats of the United States. FGDC-STD-004-2013. Second Edition. Wetland Subcommittee, Federal Geographic Data Committee and U.S. Fish and Wildlife Service, Washington, DC.

NRCS. 2006. Land Resource Regions and Major Land Resource Areas of the United States, the Caribbean, and the Pacific Basin. U.S. Department of Agriculture, Natural Resources Conservation Service. USDA Handbook 296.

NWI. 2015. NWI Wetlands and Deepwater Map Code Diagram. Map code diagram based on Classification of Wetlands and Deepwater Habitats of the United States, Cowardin et al. 1979. August 2015 Version.

USACE. 1987. Corps of Engineers Wetlands Delineation Manual. Department of the Army, Waterways Experiment Station. Vicksburg, MS. Tech. Rep. Y-87-1.

USACE. 2007a. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Alaska Region, Version 2.0. Wetlands Regulatory Assistance Program, U.S. Army Engineer Research and Development Center, Vicksburg, MS.

USACE. 2020. Corps of Engineers Regulatory Program Consultant-Supplied Jurisdictional Determination Reports. Special Public Notice (SPN) 2020-00399.

U.S. Department of Agriculture. 1994. Changes in hydric soils of the United States. U.S. Department of Agriculture, Soil Conservation Service. Federal Register 59(133): 35680-35681, July 13, 1994.

USEPA. 2020. Navigable Waters Protection Rule. Environmental Protection Agency. https://www.epa.gov/nwpr/final-rule-navigable-waters-protection-rule.

Appendix A

Data Forms and Site Photos

Scammon Bay BFU				Scammon Bay AK				6/29/2020
			Alaska Energy Authority					1
		OLM					Hillside	
		Convex		10				
Yukon-Kuskokwim Coastal Plains			61.84145		-165.57187			NAD83
		No Data						Upland
				x				
								x
			x					
			x					x
			x					

Sampling point is located on the lower embankment slopes of a closed and capped landfill.

								2
								7
			0					29%
		0			0			
alninc	*Alnus incana*		5	Yes	FAC			
spiste	*Spiraea stevenii*		5	Yes	FACU		0	0
corcan	*Cornus canadensis*		5	Yes	FACU		0	0
rubspe	*Rubus spectabilis*		5	Yes	FACU		35	105
							75	300
							0	0
			20				110	405
		10			4			3.68
dryexp	*Dryopteris expansa*		30	Yes	FACU			
chaang	*Chamaenerion angustifolium*		30	Yes	FACU	No		
calcan	*Calamagrostis canadensis*		30	Yes	FAC	No		

		90		
	45		18	
15 foot radius			0	
10			10	X

1

0 Trash

x

Soil pit not advanced due to excessive trash and debris and the presence of densely compacted fill material and boulders.

x
x
x x

No hydrologic indicators at surface. Test pits dug with excavator for geotechncial investigation revealed no water table within 18" of ground surface.

Project/Site:	Scammon Bay BFU	Sampling Date:	6/29/2020
Applicant/Owner:	Alaska Energy Authority	Sampling Point:	1
Investigator(s):	O.M.	Watershed/Stream (N/A if upland):	N/A

Remarks:



Subject: Photo shows landfill gravel cap with lower, vegetated embankment slopes below.



Subject: Vegetation at point 1.

Scammon Bay BFU Scammon Bay AK 6/29/2020

Alaska Energy Authority 2

OLM Hillside

Concave 1-2

Yukon-Kuskokwim Coastal Plains 61.84178 -165.57179 NAD83

No Data PEM1H

x

x

x
x x
x

2

2

0 100%

0 0

102 102
0 0
0 0
0 0
0 0
0 102 102
0 0 1.00

carutr	*Carex utriculata*	50	Yes	OBL	
caraqu	*Carex aquatilis*	50	Yes	OBL	Y
compal	*Comarum palustre*	2	No	OBL	Y

102

51 20.4

15 foot radius 0

0 5 X

2

Trash

x

x

No soil pit due to standing water. Strong H2S odor when walking through the area.

x x

x

x

x 1-6"

x

Strong H2S odor when walking through the area. Iron sheen visible in some areas of standing water. Drainage patterns and surface water visible on 2020 aerial imagery.

Project/Site:	Scammon Bay BFU	Sampling Date:	6/29/2020
Applicant/Owner:	Alaska Energy Authority	Sampling Point:	2
Investigator(s):	O.M.	Watershed/Stream (N/A if upland):	N/A

Remarks:



Subject: Photo shows lowland wetland in background below the landfill embankment slope.



Subject: Vegetation and surface hydrology at plot area.

Appendix B

Wetland Mapping



0 50 100
Feet

Wetland Mapping

Study Area
Wetland

Sampling Points

Upland
Wetland

Project Name:
Scammon Bay Bulk Fuel Upgrades

Project Location:
Section 10 of Township 20N,
Range 90W, Seward Meridian

Prepared For: Alaska Energy Authoirty

ALASKA ENERGY AUTHORITY

Prepared By: HDL Engineering Consultants LLC

APPENDIX E

Section 7 Consultation

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IPAC Resource List (April 9, 2021) E-12

United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
Anchorage Fish and Wildlife Conservation Office
4700 BLM Road
Anchorage, Alaska 99507

In Reply Refer to:
FWS/IR11/AFWCO

August 2, 2021

Ms. Brooke Therrien
HDL Engineering Consultants, LLC
3335 Arctic Boulevard, Suite 100
Anchorage, Alaska 99503

Subject: Scammon Bay Bulk Fuel Upgrades (Consultation 07CAAN00-2021-I-0294)

Dear Ms. Therrien:

Thank you for requesting informal consultation with the U.S. Fish and Wildlife Service (Service), pursuant to section 7 of the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq., as amended; ESA), by correspondence received June 7, 2021. The Alaska Energy Authority (AEA) on behalf of and in cooperation with the Denali Commission, proposes to replace and relocate the Askinuk Corporation's bulk fuel storage facility (tank farm) in Scammon Bay, Alaska on the Yukon-Kuskokwim Delta. The Denali Commission has granted AEA and its representative, HDL Engineering Consultants, LLC (HDL), authority to conduct this review on their behalf. The HDL has determined their proposed activities may affect but are not likely to adversely affect the federally threatened spectacled eider (*Somateria fischeri*).

The purpose of the project is to replace and relocate the existing retail fuel sales facility with a code-compliant tank farm with sufficient storage capacity to support the community's retail fuel needs and mitigate the risk of a major spill event. The proposed project would construct a new tank farm facility at the site of the old community landfill, approximately a half mile east of the existing facility. It would include three 27,000-gallon diesel bulk fuel tanks, four 27,000-gallon gasoline bulk fuel tanks, one 12,000-gallon dual product dispensing tank, an on-grade secondary containment structure with earthen/gravel berm, a gravel pad foundation, a dual product vehicle dispenser, a small retail sales building, bulk fuel truck transfer station with fuel spill containment sump, and bulk fuel transfer and vehicle dispensing distribution piping.

The existing tank farm would be decommissioned, and work would be limited to removal and disposal of existing tanks, pipes, and related fuel storage and dispensing equipment. No ground disturbing work would occur at the site. Materials required for construction such and fuel tanks, piping, building materials, and gravel surfacing material would arrive via airfreight or barge. Vehicles and heavy machinery used for construction would travel on existing gravel roadways

within the community. Fill material would be transported from the material site which is located about one mile from the proposed tank farm via existing roads. Staging for the proposed project would also occur on the existing landfill pad.

All transportation of fuel to the new tank farm would follow a similar path to the old site using existing roadways. The proposed project area is primarily located on top of a gravel cap that covers the old community landfill. A minor amount of fill may need to be placed over undisturbed wetlands beyond the existing gravel cap. Placement of additional gravel fill is necessary to ensure adequate construction and reinforcement of the existing gravel cap to support the bulk fuel tanks and piping. Excavation of undisturbed ground is not anticipated.

Avoidance and Minimization Measures
To minimize the risk of hazardous leaks and spills, the project would incorporate Scammon Bay's current Spill Prevention Control and Countermeasure (SPCC) plan for the existing bulk fuel facility operations. The contractor may also develop a SPCC plan for operations related to their work and will use best management practices, including minimization of soil disturbance during construction, to control erosion and sedimentation during operations. Additionally, any vegetation clearing will occur outside of the bird nesting season (May 15 through July 15).

Spectacled Eider
The range of the spectacle eider overlaps the proposed project area. Spectacled eiders historically nested from the Nushagak Peninsula in southwestern Alaska north to Utqiaġvik and east nearly to the Canadian border. More recently, on the Yukon Kuskokwim Delta, the majority of spectacled eiders breed within 9.3 miles of the coast from Kigigak Island north to Kokechik Bay with smaller numbers nesting south of Kigigak Island to Kwigillingok and north of Kokechik Bay to the mouth of Uwik Slough. Nesting on the Yukon Kuskokwim Delta is restricted to the vegetated intertidal zone (areas dominated by low wet-sedge and grass marshes with numerous small shallow water bodies). Nests are rarely more than 680 feet from water and are usually within a few meters of a pond or lake. While moving between nesting and molting areas, spectacled eiders travel along the coast up to 31 miles offshore. During the winter months of October through March, they move offshore to waters up to 213 feet deep, sometimes gathering in dense flocks in openings of nearly continuous sea ice.

Fuel leaks and spills are the primary potential project effects that could affect eiders. Although the project occurs within the range of the spectacled eider, the likelihood of eiders being present in the project area are low. Furthermore, it is unlikely there would be any adverse effects to any eider that did happen to enter the project area. Proposed work is primarily located on previously disturbed ground that does not contain preferred eider nesting habitat and does not directly impact coastal waters. It is unlikely that eiders would nest or be found immediately adjacent to areas proposed for development. The project includes implementation of avoidance and minimization measures to further reduce the likelihood of adverse effects.

After reviewing the proposed project and evaluating its anticipated effects, the Service concurs with your determination that the proposed project is not likely to adversely affect spectacled eiders. Based on your request and our response, our joint responsibilities under section 7 of the ESA have been satisfied. However, if new information reveals that project impacts may affect

listed species or critical habitat in a manner or to an extent not previously considered, or if this action is subsequently modified in a manner which was not considered in this assessment, or if a new species is listed or critical habitat designated that may be affected by the proposed action, section 7 consultation must be reinitiated.

This letter relates only to federally listed or proposed species and/or designated or proposed critical habitat under jurisdiction of the Service. It does not address species under the jurisdiction of the National Marine Fisheries Service, or other legislation or responsibilities under the Fish and Wildlife Coordination Act, Migratory Bird Treaty Act, Marine Mammal Protection Act, Clean Water Act, National Environmental Policy Act, or Bald and Golden Eagle Protection Act.

Thank you for your coordination to meet our joint responsibilities under the ESA. If you have questions or need more information, please contact Ms. Libby Benolkin at 907-271-2768 or at elizabeth_benolkin@fws.gov and refer to consultation number 07CAAN00-2021-I-0294.

Sincerely,

DOUGLASS COOPER

Digitally signed by DOUGLASS COOPER
Date: 2021.08.02 10:16:28 -08'00'

Douglass M. Cooper
Ecological Services Branch Chief

June 7, 2021

Mr. Douglass Cooper
Ecological Services Branch Chief
Anchorage Fish and Wildlife Field Office
U.S. Fish and Wildlife Service
605 West 4th Avenue, Rm G-61
Anchorage, Alaska 99501

RE: Scammon Bay Bulk Fuel Upgrades
Endangered Species Act Section 7 – Initiation of Informal Consultation

CIVIL ENGINEERING

GEOTECHNICAL ENGINEERING

TRANSPORTATION ENGINEERING

ENVIRONMENTAL SERVICES

PLANNING

SURVEYING & MAPPING

CONSTRUCTION ADMINISTRATION

MATERIAL TESTING

Dear Mr. Cooper:

The Alaska Energy Authority (AEA), in cooperation with the Denali Commission, is proposing to replace and relocate the Askinuk Corporation's bulk fuel storage facility (tank farm) in Scammon Bay, Alaska. The project is located within Section 10 , Township 20 North, Range 90 West, Seward Meridian; on U.S. Geological Survey Quadrangle Hooper Bay D-2; and at Latitude 61.94112° North, Longitude 165.57184° West (Figure 1).

Pursuant to Section 7 of the Endangered Species Act (ESA), we are initiating informal consultation with you to request your concurrence that the proposed project is not likely to adversely affect listed Threatened, Endangered, or Candidate species or their designated critical habitat. The Denali Commission has granted AEA and its representative, HDL Engineering Consultants, LLC, authority to conduct this review on their behalf. An email from Denali Commission delegating authority to consult on their behalf is attached.

Project Description

The Askinuk Corporation's existing tank farm is the sole retail fuel sales facility in the community. The facility is in poor condition, has inadequate containment, is located in the floodplain, and is threatened by ice flows on a yearly basis. The tanks, pumps, and piping are beyond their useful life and are severely corroded. The facility is not code-compliant and is a high risk for a fuel spill. A spill from a ruptured tank could overtop the damaged and settled sections of the secondary containment walls and reach navigable waters of the U.S. and detrimentally impact sensitive coastal wildlife habitat.

The purpose of the project is to provide a code-compliant tank farm with sufficient storage capacity to support the community's retail fuel needs and mitigate the risk of a major spill event. The proposed project will construct a new tank farm facility at the site of the old community landfill, approximately ½ mile east of the existing facility. The new facility includes the following components:

- Three 27,000-gallon diesel bulk fuel tanks
- Four 27,000-gallon gasoline bulk fuel tanks
- One 12,000-gallon dual product dispensing tank
- On-grade secondary containment structure with earthen/gravel berm
- Gravel pad foundation
- Dual product vehicle dispenser
- Small retail sales building
- Bulk fuel truck transfer station with fuel spill containment sump
- Bulk fuel transfer and vehicle dispensing distribution piping

Material Sites

Fill material for the project has been made available from a road-accessible quarry owned by the Askinuk Corporation approximately one mile southeast of the proposed tank farm site. The contractor will be required to secure all permits and clearances necessary for material and disposal sites used for the project. Material and disposal sites that have not received the appropriate permits and clearances will not be accepted for project construction.

Existing Tank Farm

The existing tank farm will be decommissioned. Work will be limited to removal and disposal of existing tanks, pipes, and related fuel storage and dispensing equipment. No ground disturbing work will occur at the site.

Site Access

Materials required for construction such and fuel tanks, piping, and building materials, and gravel surfacing material will arrive via airfreight or barge. Vehicles and heavy machinery used for construction will travel on existing gravel roadways within the community. Fill material will be transported from the material site to the new tank farm via existing roads. Staging for the proposed project will also occur on the existing landfill pad.

Fuel Hauling

Fuel is currently transported through the community from the existing barge landing to the school, located southeast of the project site. All transportation of fuel to the new tank farm will follow a similar path using existing roadways.

Proposed Tank Farm Location

The proposed project area is primarily located on top of a gravel cap that covers the old community landfill. A minor amount of fill may be placed over undisturbed wetlands beyond the existing gravel cap. Placement of additional gravel fill is necessary to ensure adequate construction and reinforcement of the existing gravel cap to support the bulk fuel tanks and piping. Excavation of undisturbed ground is not anticipated.

Existing Site Conditions

The proposed project area as well as secondary sites associated with the proposed project are shown on Figures 2 & 3. The direct project footprint at the proposed project site is comprised of the project boundary, which is approximately 2.1 acres.

ESA-Listed Species

A review of the U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation (IPaC) project planning tool and USFWS Environmental Conservation Online System (ECOS) (reviewed April 9, 2021) identified one threatened species, the spectacled eider (*Somateria fischeri*), that occurs within the vicinity of the project area. There are no known endangered species or designated critical habitats to occur within the vicinity of the proposed project area.

Potential Effect on Listed Species

Fuel leaks and spills are the primary threat to listed threatened and endangered species within the project area. Although eiders may be found within the project area, impacts to these species are not anticipated. Proposed work is primarily located on previously disturbed ground that does not contain preferred eider nesting habitat and does not directly impact coastal waters. It is unlikely that eiders would nest or be found immediately adjacent to areas proposed for development.

The existing tank farm is currently a greater risk due to its location and, along with aging infrastructure, there is a growing likelihood of a significant spill event. Decommissioning the existing tank farm and relocating the storage of bulk fuel away from the Kun River and out of the floodplain will mitigate both the risk of a significant spill event and the potential hazards to sensitive coastal habitats.

Impact Mitigation Measures

To minimize the risk of hazardous leaks and spills, the new facility will be incorporated into Scammon Bay's current Spill Prevention Control and Countermeasure (SPCC) plan for the existing bulk fuel facility operations. The contractor may also develop a SPCC plan for operations related to their work and will use best management practices, including minimization of soil disturbance during construction, to control erosion and sedimentation during operations. Additionally, should any vegetation clearing be required it will be completed outside of the bird nesting season (May 15 through July 15).

For these reasons, we conclude that the project is not likely to adversely affect spectacled eiders. We request your concurrence with our determination and look forward to discussing this project with you further.

If you have any questions or comments related to the proposed project, contact me by phone at (907) 538-4733, or via email at btherrien@hdlalaska.com. Questions concerning the engineering aspects of the proposed project can be directed to David Cooper, P.E., Project Engineer at (907) 564-2161, or via email at dcooper@hdlalaska.com.

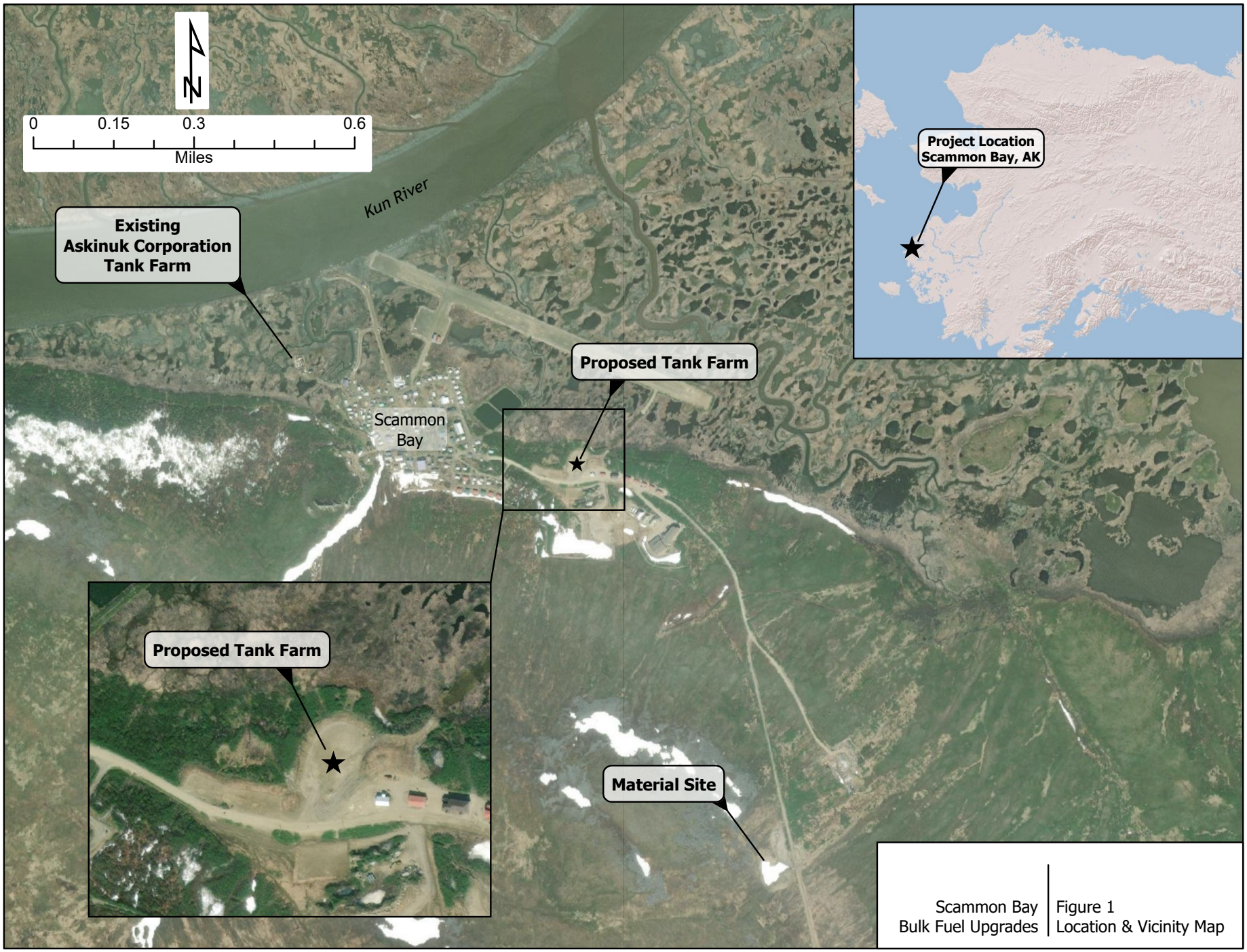
Sincerely,

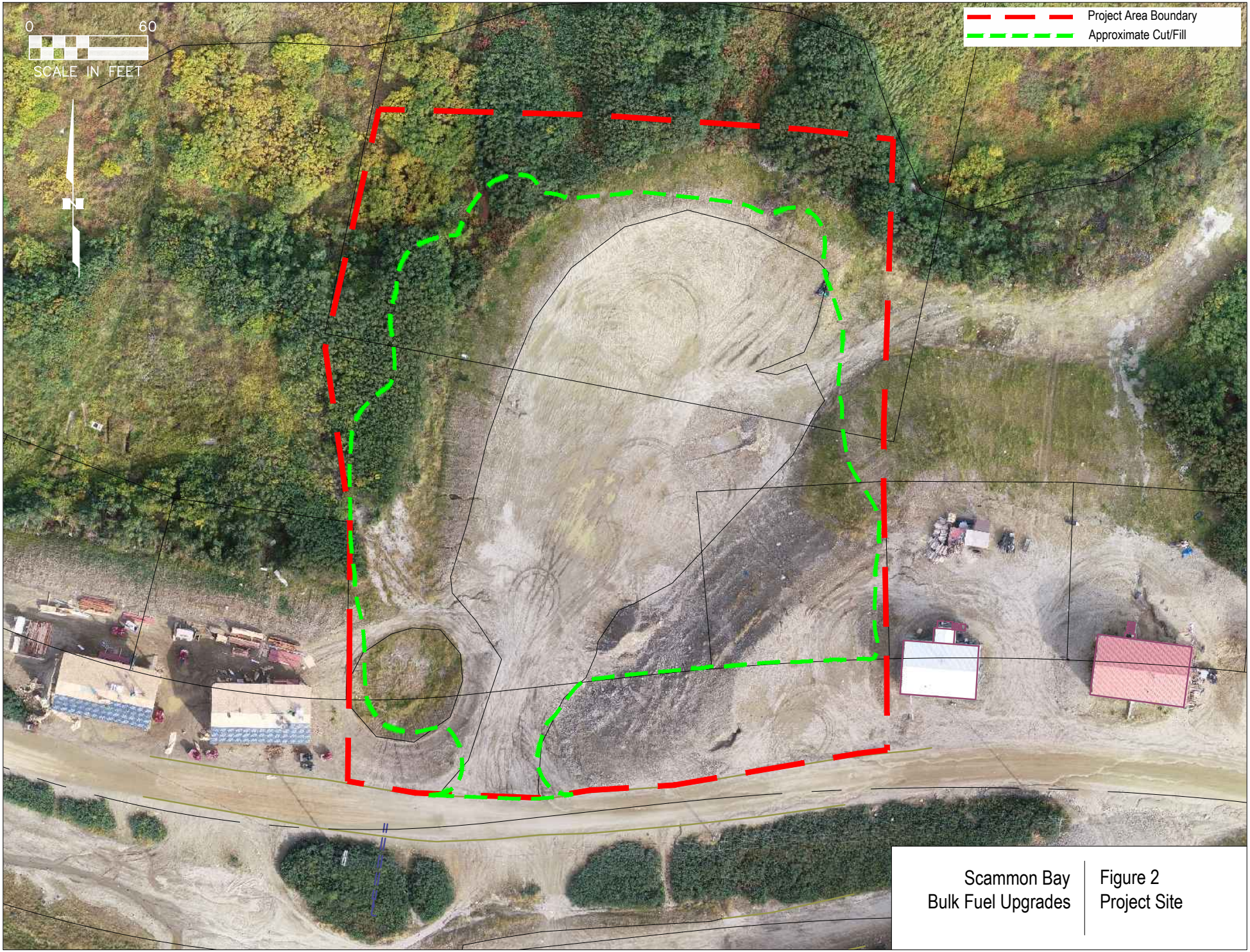
Brooke Therrien

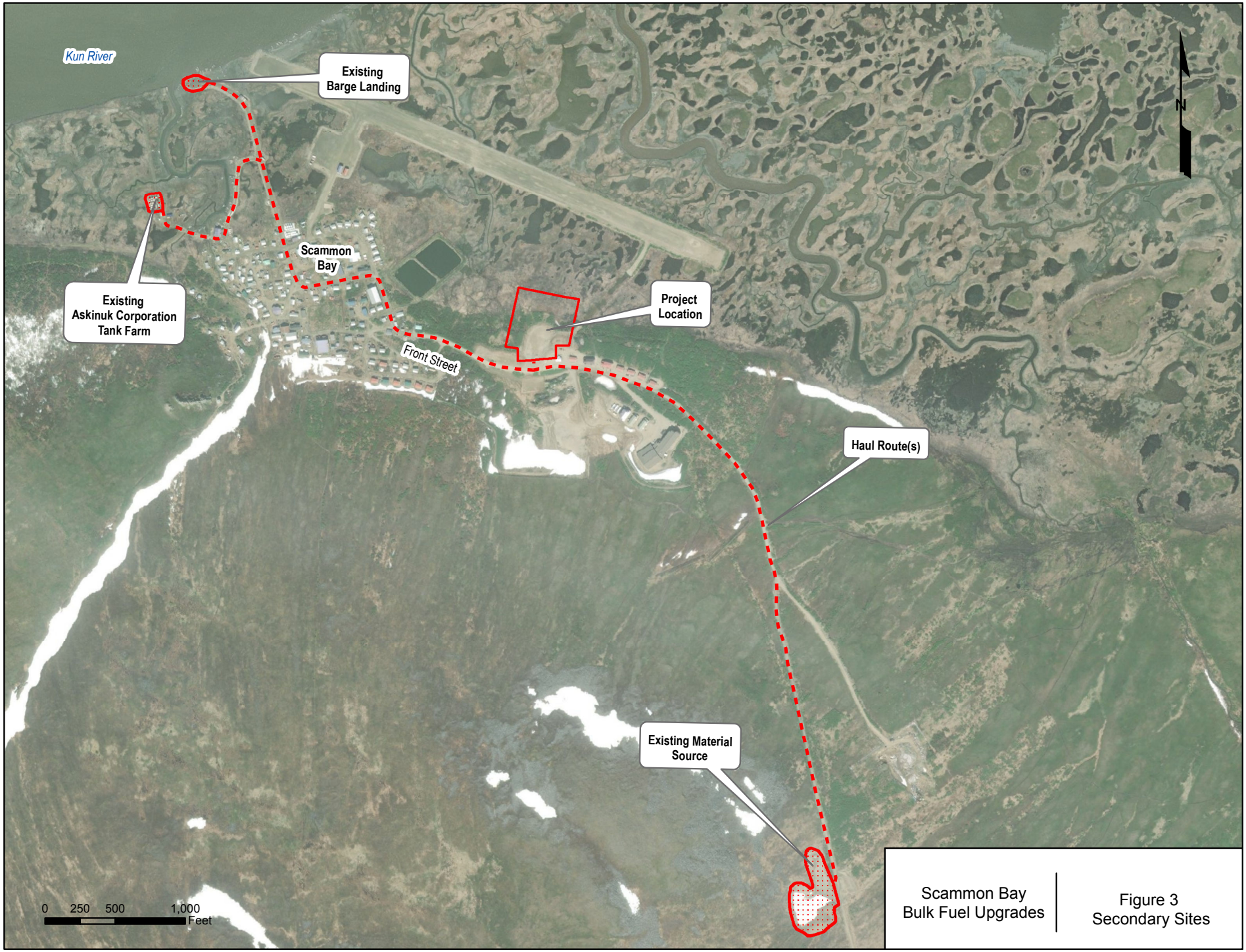
Brooke Therrien
Environmental Specialist

attach: Figure 1: Location and Vicinity Map
Figure 2: Project Site
Figure 3: Secondary Sites
Denali Commission Email, Delegation of Authority

cc: Bill Price, P.E., AEA Project Manager
Tyde Riopelle, P.E., AEA Project Manager
David Cooper, P.E., HDL Project Engineer


N
0
0.15
0.3
0.6
Miles
Kun River
Existing
Askinuk Corporation
Tank Farm
Scammon
Bay
Proposed Tank Farm
Project Location
Scammon Bay, AK
Proposed Tank Farm
Material Site
Scammon Bay
Bulk Fuel Upgrades
Figure 1
Location & Vicinity Map


0
60
SCALE IN FEET
Project Area Boundary
Approximate Cut/Fill
Scammon Bay
Bulk Fuel Upgrades
Figure 2
Project Site


Kun River
Existing Barge Landing
Scammon Bay
Existing Askinuk Corporation Tank Farm
Front Street
Project Location
Haul Route(s)
Existing Material Source
N
0 250 500 1,000
Feet
Scammon Bay
Bulk Fuel Upgrades
Figure 3
Secondary Sites

From: Thomas Wolf
To: William (Bill) Price
Subject: [External Outside Email] Delegation of Authority

Bill - This email is to convey that the Denali Commission is delegating the authority to consult with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act for the Scammon Bay Bulk Fuel Upgrade Project to the consulting firm HDL Engineering Consultants LLC, a representative of the Alaska Energy Authority.

Thanks,

Tom

Thomas S. Wolf, P.E., PMP
Program Manager
Denali Commission
510 L Street, Suite 410
Anchorage, AK 99501

Phone: 907-271-1414
Direct: 907-271-5232
Fax: 907-271-1415

IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

NOT FOR CONSULTATION

Project information

NAME

Scammon Bay BFU

LOCATION

Kusilvak County, Alaska



DESCRIPTION

None

Local office

Anchorage Fish And Wildlife Conservation Office

(907) 271-2888
(907) 271-2786

4700 Blm Road
Anchorage, AK 99507

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Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Log in to IPaC.
2. Go to your My Projects list.
3. Click PROJECT HOME for this project.
4. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS

Spectacled Eider Somateria fischeri Threatened

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.
https://ecos.fws.gov/ecp/species/762

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php
- Measures for avoiding and minimizing impacts to birds http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php
- Nationwide conservation measures for birds http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf

THERE ARE NO MIGRATORY BIRDS OF CONSERVATION CONCERN EXPECTED TO OCCUR AT THIS LOCATION.

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

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What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the AKN Phenology Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets .

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The Cornell Lab of Ornithology All About Birds Bird Guide, or (if you are unsuccessful in locating the bird of interest there), the Cornell Lab of Ornithology Neotropical Birds guide. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

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For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

NOT FOR CONSULTATION

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

THERE ARE NO KNOWN WETLANDS AT THIS LOCATION.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION

APPENDIX F

Contaminated Sites Consultation

Table of Contents

Contaminated Sites Consultation (September 1, 2021) F-1

From:	Ballard, Flannery (DEC)
To:	Brooke A. Therrien
Cc:	Kusche, Kara C (DEC)
Subject:	RE: Scammon Bay Bulk Fuel Upgrades
Date:	Wednesday, September 1, 2021 3:40:41 PM
Attachments:	image002.png image003.png image004.png image005.png

Good afternoon Brooke,

I am the new project manager for the Scammon Bay Askinuk Corp Tank Farm contaminated site (hazard ID: 26910). Janice Wiegers let me know that you had contacted her on August 30, 2021 in regards to the scoping report for the Askinuk Corporation's new bulk fuel storage facility at Scammon Bay. I am reaching out to coordinate with you in regards to this activity.

Based on our best professional judgement, it is unlikely that the Scammon Bay Askinuk Corp Tank Farm contaminated site will have an impact on your project. That being said, if you do experience any previously unknown contamination, please contact me to arrange appropriate sampling of the site.

Flannery Ballard
Environmental Program Specialist
Alaska Dept. of Environmental Conservation

From: Wiegers, Janice K (DEC) <janice.wiegers@alaska.gov>
Sent: Tuesday, August 31, 2021 11:55 AM
To: BTherrien@HDLAlaska.com
Cc: Ballard, Flannery (DEC) <flannery.ballard@alaska.gov>; Kusche, Kara C (DEC) <kara.kusche@alaska.gov>
Subject: FW: Scammon Bay Bulk Fuel Upgrades

Hello Brooke,

The new project manager for the Scammon Bay Askinuk Corp Tank Farm is Flannery Ballard. Please coordinate with her on this site.

Janice Wiegers
Alaska Department of Environmental Conservation
Contaminated Sites Program
610 University Avenue
Fairbanks, Alaska 99709
Phone: (907) 451-2127
Email: janice.wiegers@alaska.gov

From: Brooke A. Therrien <BTherrien@HDLAlaska.com>
Sent: Tuesday, August 31, 2021 10:15 AM
To: Wiegers, Janice K (DEC) <janice.wiegers@alaska.gov>
Subject: Scammon Bay Bulk Fuel Upgrades

Hi Janice – Thanks for chatting with me yesterday.

I am contacting you regarding an existing contaminated site in Scammon Bay, Alaska, known as Scammon Bay Askinuk Corp Tank Farm (hazard ID 26910). Currently, the Alaska Energy Authority, in cooperation with the Denali Commission, is proposing to replace and relocate the Askinuk Corporation's bulk fuel storage facility (tank farm). An initial agency scoping request was sent via email in April 2021 from my colleague, Owen Means. Below you will see the email correspondence that resulted from that initial agency scoping request. I have also attached the initial agency scoping request for your reference.

The purpose of this email is to follow up with ADEC's response and to clarify that no ground disturbance or excavation is proposed at the existing tank farm site and confirm that no further consultation with ADEC's Contaminated Sites division is required per the scope of this project.

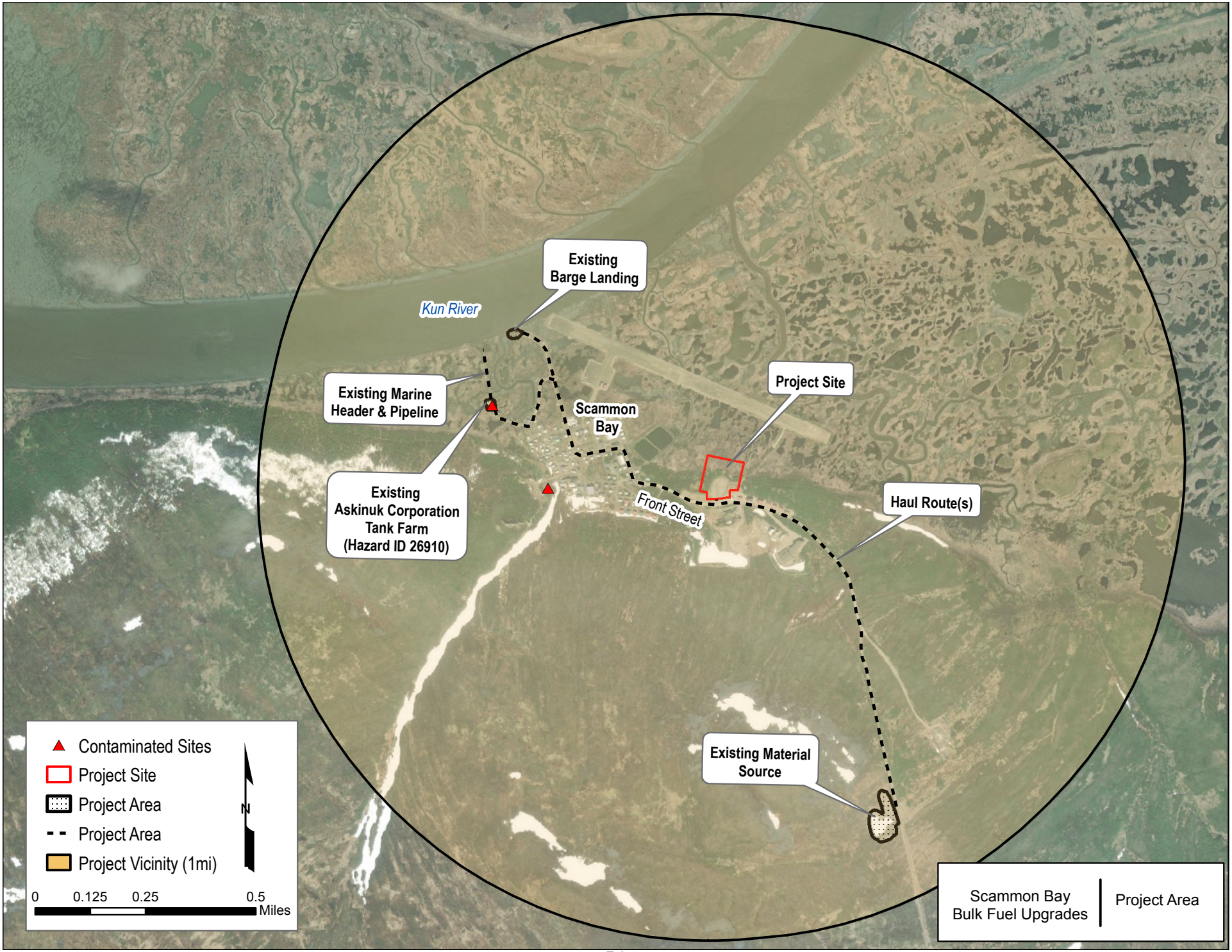
Currently, all bulk fuel storage tanks and above ground piping, located at the contaminated site (hazard ID 26910), will be decommissioned, removed, and taken to the local community landfill. Additionally, a marine header and pipeline, located on the ground surface, that connects the tank farm to the marine header will be decommissioned, removed, and taken to the local community landfill (see reference figure). Consultation with local community representatives have confirmed that the existing landfill has the capacity to receive waste and debris associated with the decommissioning and removal of the bulk fuel tanks, piping, pipeline, and marine header. Future consultation with ADEC regarding any excavation or ground disturbance at the contaminated site will be the responsibility of the Askinuk Corporation.

Please do not hesitate to contact me if further discussion or consultation is needed.

Sincerely,

BROOKE THERRIEN,
Environmental Specialist
o: [907.564.2120] | c: [907.538.4733]
www.HDLalaska.com

From: Wiegers, Janice K (DEC) <janice.wiegers@alaska.gov>
Sent: Monday, April 19, 2021 2:44 PM
To: Owen L. Means <omeans@hdlalaska.com>
Cc: Buss, Stephanie D (DEC) <stephanie.buss@alaska.gov>; Guintu, Randy R (DEC)


Existing Barge Landing
Kun River
Existing Marine Header & Pipeline
Scammon Bay
Project Site
Existing Askinuk Corporation Tank Farm (Hazard ID 26910)
Front Street
Haul Route(s)
Existing Material Source
Contaminated Sites
Project Site
Project Area
Project Area
Project Vicinity (1mi)
N
0
0.125
0.25
0.5
Miles
Scammon Bay Bulk Fuel Upgrades
Project Area

APPENDIX G

Public & Agency Consultation

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Public Open House

Project: Scammon Bay Bulk Fuel Upgrade

Location: Native Village of Scammon Bay - Tribal Office (OUTSIDE)

Date/Time: June 29, 2020, 4:30-5:30 pm

The Alaska Energy Authority (AEA), in cooperation with the Native Village of Scammon Bay, the City of Scammon Bay and Askinuk Corporation, will host a public open house on June 29, 2020 from 4:30-5:30 pm at the Native Village of Scammon Bay tribal office. To accommodate social distancing guidelines, the open house will be held outdoors in front of the tribal office building. Representatives from AEA and HDL Engineering Consultants, LLC (HDL) will present the proposed upgrade of the Askinuk Corporation tank farm (Bulk Fuel Facility), and be available for questions and community feedback. If you are unable to attend the open house, please direct questions or comments regarding the project to Owen Means, HDL, at 907-564-2143 or omeans@hdlalaska.com

Scammon Bay Bulk Fuel Upgrade

Sheet 1/1

6/29/2020

Sign In Sheet

Name	Organization (optional)	Email / Phone #
Tim KAGANAK	ASK. Corp	545-242
James Kaganak	Ask Corp	askmunicorp@yahoo
Elizabeth Kasayuli		
Priscilla Jimmie		
Haley [illegible]		558-6195
[illegible]	bjuluke@yahoo.com	558-6245
[illegible]	[illegible]	[illegible]
John Akerelrea		
James AKERELREA	TC	akeem258@msn.com 558-6410
Brandon Aguchak	TC	baguchak@me.com 558-542
EKAM SUNDOWN	TRIBE	admin@marayarmiut.com
Zachery Uttereyuk	Tribe	Zachery.Uttereyuk@yahoo.com 558-6238
Michael Uttereyuk	Tribe	558-6144
Elizabeth Uttereyuk	Tribe	blushed_guskimo@yahoo.com
[illegible]	Tribe	Michael.Akerelrea@yahoo

Scammon Bay Traditional Council
103 Askinuk Street/P.O. Box 110 Scammon Bay, AK 99662-0110
Phone (907) 558-5425 Fax (907) 558-5134 E-mail admin@marayarmiut.com

RESOLUTION 20-08-11-3

Native Village of Scammon Bay Bulk Fuel Facility
Land Agreement and Official Acceptance

Pursuant to the Native Village of Scammon Bay Resolution # 20-08-11-3 the Native Village of Scammon Bay Bulk Fuel Facility serves the well-being of Native Village of Scammon Bay tribal members, residents and visitors.

Whereas, This bulk fuel facility project is an urgent need in the tribal community of Native Village of Scammon Bay.

Whereas, The Native Village of Scammon Bay, Alaska agrees to receive tribal ownership of the bulk fuel facility.

Whereas, The Askinuk Corporation and The Native Village of Scammon Bay (NVSB) have agreed in the ownership of the bulk fuel facility and are processing the official transfer of ownership from the Askinuk Corporation to the Native Village of Scammon Bay.

Now therefore be it resolved that, The location is known as the 'old city dump location'. (SITE SELECTION #3) Additional location description to be included in the transfer official paperwork for the bulk fuel facility.

CERTIFICATION

This certifies that the Council is composed of five (7) duly elected members of the Native Village of Scammon Bay whom 5 were present at a meeting this 11th day of August, 2020 and the Council adopted this resolution by a vote of 5 in favor, and 0 in opposition, ___ abstaining.

NATIVE VILLAGE OF SCAMMON BAY COUNCIL
Attest:

Anthony Ulak, President

John Uttereyuk, Secretary/Treasurer

Askinuk Corporation

P.O. Box 89 • Scammon Bay, Alaska 99662 • Phone: 907-558-5411 • Fax: 907-558-5412 • E-mail: askinukcorp@yahoo.com

August 4, 2020

Special Meeting

Call to order by Chairman, Harley Sundown at 10:05am

Roll Call: Harley Sundown, Homer Hunter, Tim Kaganak, Randall Charlie present, Byron Ulak will join later, has previous commitment. Also, in attendance, Office Manager, James Kaganak.

Invocation: Tim Kaganak

Business: Location of new tank farm. Three possible sites to construct tank farm, Site # 1, Hill Site, Site #2, AVEC Site, and Site #3, Landfill Site. Review of letter from HDL Engineering of their findings of each site. Lively discussion on each site. All board members voiced their opinion of advantages, cost and disadvantages, accessibility, flood potential and settlement of gravel in each site. After discussion, Homer Hunter makes a motion to select Site # 3, the Landfill Site, second by Tim Kaganak, all in favor, motion passes. Roll Call: Harley Sundown, Homer Hunter, Tim Kaganak and Randall Charlie vote yes, Byron Ulak cast his yes vote by text and will confirm in the Regular Meeting.

Land Request: The Scammon Bay Traditional Council's request for land to place a couple of modular buildings next to the Corporation Office. The Board discussed the area and want to use this area for future growth of the Corporation. Request is denied but asks SBTC to look for alternative site. The board unanimously appoints James Kaganak to work with Brandon Aguchak and report back to the Board for the selection.

Comments: Homer Hunter comments about the unfinished business of 14c lands and would like it discussed in the next regular board meeting. No other comments.

Adjournment: Tim Kaganak makes a motion to adjourn, second by Randall Charlie, all in favor, motion passes.

Adjourned at 10:39 am.

April 19, 2021

RE: Request for Scoping Comments
Scammon Bay Bulk Fuel Upgrades

The Alaska Energy Authority (AEA) is soliciting comments and information on a proposed project to replace and relocate the Askinuk Corporation's bulk fuel storage facility (tank farm) in Scammon Bay, Alaska. The project is federally funded through the Denali Commission. The project is located within Section 10 , Township 20 North, Range 90 West, Seward Meridian; on USGS Quadrangle Hooper Bay D-2; and at Latitude 61.94112° North, Longitude 165.57184° West (Figure 1).

Purpose and Need

The Askinuk Corporation's existing tank farm is the sole retail fuel sales facility in the community. The facility is in poor condition, has inadequate containment, is located in the floodplain, and is threatened by ice flows on a yearly basis. The tanks, pumps, and piping are beyond their useful life and are severely corroded. The facility is not code-compliant and is a high risk for a fuel spill. A spill from a ruptured tank could overtop the damaged and settled sections of the secondary containment walls and reach navigable waters of the U.S. and detrimentally impact sensitive coastal wildlife habitat.

The purpose of the project is to provide a code-compliant tank farm with sufficient storage capacity to support the community's retail fuel needs and mitigate the risk of a major spill event.

Proposed Action

The proposed project will construct a new tank farm facility at the site of the old community landfill, approximately ½ mile east of the existing facility. The new facility includes the following components:

- Three 27,000-gallon diesel bulk fuel tanks
- Four 27,000-gallon gasoline bulk fuel tanks
- One 12,000-gallon dual product dispensing tank
- On-grade secondary containment structure with earthen/gravel berm
- Gravel pad foundation
- Dual product vehicle dispenser
- Small retail sales building
- Dual product truck fill dispenser with containment sump
- Truck fill and vehicle dispensing distribution piping

Material Sites

Fill material for the project has been made available from a road-accessible quarry owned by the Askinuk Corporation approximately one mile southeast of the proposed tank farm site. The contractor will be required to secure all permits and clearances necessary for material and disposal sites used for the project. Material and disposal sites that have not received the appropriate permits and clearances will not be accepted for project construction.

Preliminary Environmental Research
The proposed project is not expected to involve any significant environmental impacts and an Environmental Assessment will be prepared. Preliminary research using the most current available data to identify environmental resources within the project vicinity is attached. To ensure that all factors are considered in developing the proposed project, please provide your written comments, recommendations, and the additional requested information to our office no later than May 20, 2021.

If you have any questions about the proposed project, please contact Owen Means, Environmental Specialist, at (907) 564-2143, or via email at omeans@hdlalaska.com.

Sincerely,

HDL ENGINEERING CONSULTANTS, LLC

Owen Means
Environmental Specialist

attach: Figure 1: Location and Vicinity Map
Preliminary Environmental Research

cc: Bill Price, P.E., AEA Project Manager

Air Quality

A review of the Alaska Department of Environmental Conservation (ADEC) Air Non-Point Mobile Source website on April 9, 2021, indicated the proposed project is not in an air quality maintenance or non-attainment area for National Ambient Air Quality Standards.

Resident and Anadromous Fish Habitat

A review of the Alaska Department of Fish and Game (ADF&G) Fish Resource Inventory mapper and the National Oceanic and Atmospheric Administration Essential Fish Habitat mapper on April 9, 2021, indicated there are no resident or anadromous fish-bearing waters or Essential Fish Habitat within the project area.

Estimated Ground Disturbance and Clearing Activities

The proposed project's total ground disturbance is estimated to be 2.0 acres. Accordingly, the project would require coverage under the Alaska Pollutant Discharge Elimination System Construction General Permit and a Storm Water Pollution Prevention Plan.

Floodplain and Regulatory Floodway

A review of the Federal Emergency Management Agency online flood maps on April 9, 2021, indicated there are no published flood maps covering the proposed project area. The project area is located at the base of a hill, outside of areas known by the community to have experienced flooding in the past.

Hazardous Waste

A review of ADEC's Contaminated Sites mapper on April 9, 2021, indicated there are no known contaminated sites in the vicinity of the project area.

Historic Properties, Archaeological and Cultural Resources

A desktop cultural resources assessment performed for the project in October 2020 indicated there are no previously identified cultural resources or historic properties in the vicinity of the project area or local material source. The assessment concluded that neither the project area nor material source have a high potential for containing archaeological resources. In accordance with Section 106 of the National Historic Preservation Act, the Alaska Energy Authority (AEA) will develop an Area of Potential Effect for the project, coordinate with consulting parties (including the Alaska State Historic Preservation Officer), and make a finding of effect.

Invasive Species

A review of the University of Alaska Anchorage Exotic Plants Information Clearinghouse Invasive Plants mapper on April 9, 2021, did not reveal any known non-native species infestations in the project area. The project is anticipated to involve ground disturbance. AEA will comply with Executive Order 13112 (Invasive Species) by ensuring that ground disturbing activities are minimized and disturbed areas are re-vegetated with seed recommended for the

region by the Alaska Department of Natural Resources' (ADNR) *A Revegetation Manual for Alaska*.

Migratory Birds and Eagles' Nests
Several migratory bird species may travel through the proposed project area and may be disturbed by clearing operations. Vegetation clearing associated with the project is expected to follow U.S. Fish and Wildlife Service (USFWS) recommended time periods for avoiding clearing in the Yukon-Kuskokwim region of Alaska (May 5 – July 25 in shrub or open habitat), except as allowed by state, federal, and local laws, and as approved by AEA.

Suitable eagle nesting habitat exists in the general project vicinity; however, none are known to be within 660 feet of the proposed work. If eagle nests are sighted within 660 feet of the project area during or prior to construction, AEA will seek guidance from the USFWS on how to proceed.

Navigable Waters
No navigable waters are located within or immediately adjacent to the proposed project.

Land Ownership and Operation
The proposed project is located on land owned by the Askinuk Corporation, with a portion of the site containing a right-of-way easement belonging to the City of Scammon Bay. The Askinuk Corporation and the City of Scammon Bay intend to convey site control of the required tank farm parcel to the Native Village of Scammon Bay. The Askinuk Corporation would operate and maintain the facility through an agreement with the Native Village of Scammon Bay.

State Parks, National Parks, National Forests, Wild and Scenic Rivers
A review of the National Park Service and U.S. Forest Service websites on April 9, 2021, indicated no national parks, monuments, preserves, national forests, or wild and scenic rivers are located within or adjacent to the proposed project area.

A review of ADNR's Division of Parks and Outdoor Recreation website on April 9, 2021, indicated no state parks or recreation areas are located in or adjacent to the project area.

State Refuges, National Wildlife Refuges, Critical Habitat Areas and Sanctuaries
A review of the ADF&G online listing of State of Alaska Refuges, Critical Habitat Areas, and Sanctuaries on April 9, 2021, indicated no state refuges, critical habitat areas, or sanctuaries are located in the vicinity of the project.

An April 9, 2021, review of the USFWS Information for Planning and Consultation website (IPaC) indicated that no national wildlife refuges are present within the vicinity of the project.

Threatened and Endangered Species
A review of the USFWS IPaC website and the ADF&G threatened and endangered species website on April 9, 2021, indicated that the threatened Spectacled Eider (*Polysticta fischeri*) may occur in the project area. There is no designated critical habitat in the project area. Ground disturbance will be limited to less than 0.5 acre of shrub-dominated wetlands and 1.5 acres of

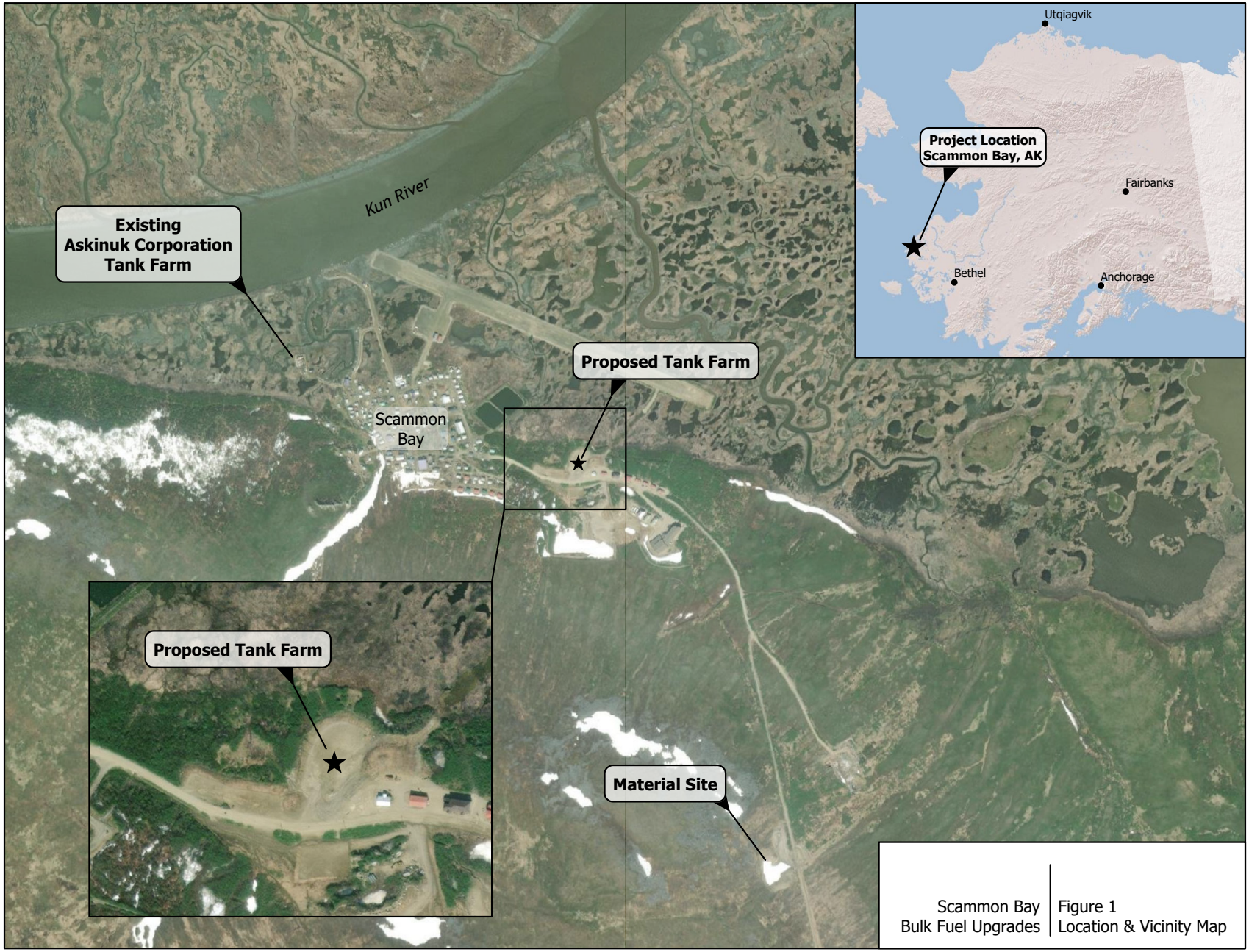
previously developed areas. AEA and the contractor will implement a Storm Water Pollution Prevention Plan, minimizing the potential for storm water to adjacent wet tundra. In accordance with Section 7 of the Endangered Species Act, AEA will coordinate with USFWS and make a finding of effect.

Water Quality

The project area's receiving waters include the Kun River and adjacent wetlands. A review of the ADEC 2018 Integrated Water Quality Monitoring and Assessment Report indicates there are no 303-listed waterbodies in the vicinity of the project. The proposed project will not significantly increase impervious surface area, and will incorporate appropriate erosion control measures. Any storm water reaching receiving waters is not anticipated to affect the attainment status of any waterbody.

Wetlands and Other Waters of the U.S.

Wetland mapping from the USFWS National Wetlands Inventory is not available for the project area. A wetland delineation completed for the project indicates wetlands are present within the project area beyond the embankment of an existing gravel pad. The project is anticipated to involve dredge and/or fill within wetlands, and AEA will seek USACE authorization.


Utqiagvik
Project Location
Scammon Bay, AK
Fairbanks
Bethel
Anchorage
Kun River
Existing
Askinuk Corporation
Tank Farm
Scammon
Bay
Proposed Tank Farm
Proposed Tank Farm
Material Site
Scammon Bay
Bulk Fuel Upgrades
Figure 1
Location & Vicinity Map

From:	Owen L. Means
To:	jimmy.smith@alaska.gov; dec.webmaster@alaska.gov; Aldrich, Lori (DEC); grant.lidren@alaska.gov; jim.rypkema@alaska.gov; cindy.heil@alaska.gov; dfg.hab.infoanc@alaska.gov; tammy.davis@alaska.gov; pamela.russell@alaska.gov; oha.revcomp@alaska.gov; regpagemaster@usace.army.mil; vaughan.molly@epa.gov; douglass_cooper@fws.gov; jordan_muir@fws.gov; City of Scammon Bay; askinukcorp@yahoo.com; calista@calistacorp.com; Brandon Aguchak
Cc:	William (Bill) Price
Subject:	Scammon Bay Bulk Fuel Upgrade: Request for Comments
Date:	Monday, April 19, 2021 11:36:49 AM
Attachments:	Scammon Bay BFU_Agency Letter_4.19.21.pdf image001.png

Dear Agency Staff,

The Alaska Energy Authority (AEA), in cooperation with the Denali Commission, is soliciting comments and information on a proposed project to replace and relocate the Askinuk Corporation's bulk fuel storage facility, in Scammon Bay, Alaska. The project's scoping materials are attached to this email.

After reviewing the attached scoping materials, please reply with the following information:

1. Further analysis needed to evaluate sensitive resources potentially impacted by the proposed project.
2. Regulatory permits and/or clearances required from your agency.
3. Any concerns or issues your agency or organization might have with the proposed project.

We are requesting that comments be delivered by **May 20, 2021**. Comments may be emailed to omeans@hdlalaska.com. If you feel that someone else in your organization should receive this notification, please forward this email to them so they may comment.

Respectfully,

Owen Means
Environmental Specialist

20 YEARS HDL ENGINEERING CONSULTANTS LLC
3335 Arctic Blvd, Suite 100 | Anchorage, Alaska 99503
main 907-564-2120 | direct 907-564-2143 | cell 907-441-7142
OMeans@HDLAlaska.com | www.HDLAlaska.com

Agency	Name	Title	Phone	Email	Address
State					
AK Department of Commerce, Community, & Economic Development (ADCCED) *	Jimmy Smith	Local Gvt Specialist (Acting Floodplain Mgr)	269-4132	jimmy.smith@alaska.gov	550 W. 7th Ave, Suite 1640, Anchorage, AK 99501
AK Department of Environmental Conservation (ADEC) *	Generic			dec.webmaster@alaska.gov	
ADEC, Division of Environmental Health, Solid Waste Program	Lori Aldrich		269-7622	lori.aldrich@alaska.gov	
ADEC, Division of Spill Prevention and Response, Contaminated Sites *	Grant Lidren	Environ Program Spec	269-8685	grant.lidren@alaska.gov	
ADEC, Division of Water, APDES *	James Rypkema	Storm Water and Wetlands Manager	334-2288	jim.rypkema@alaska.gov	555 Cordova ST, Anchorage, AK 99501
ADEC, Division of Air Quality, Non-Point & Mobile Sources Program *	Cindy Heil	Program Director	269-7579	cindy.heil@alaska.gov	
AK Department of Fish and Game (ADF&G), Division of Habitat *	Generic			dfg.hab.infoanc@alaska.gov	
ADF&G, Division of Habitat, Invasive Species Program	Tammy Davis	Project Leader	465-6183	tammy.davis@alaska.gov	
ADNR, DPOR, Land and Water Conservation Fund 6(f) *	Pamela Russell	Natural Resource Specialist III	714-2471	pamela.russell@alaska.gov	
ADNR, Division if Parks & Outdoor Recreation (DPOR), State Historic Preservation Officer (SHPO) *	Generic			oha.revcomp@alaska.gov	
Federal					
USACE *	Generic	Send permit applications and scoping letters		regpagemaster@usace.army.mil	
U.S. Environmental Protection Agency (USEPA) *	Molly Vaughan	NEPA Reviewer		vaughan.molly@epa.gov	
USFWS Endangered Species	Douglass Cooper	Branch Chief	786-3488	douglass_cooper@fws.gov	
USFWS	Jordan Muir	Raptor Specialist (Eagles Nest Contact)	786-3503	jordan_muir@fws.gov	
Regional *					
City of Scammon Bay	Larson Hunter	City Manager	558-5529	cityofscammon@marayarmiut.com	
Native Corporations *					
Askinuk Corporation (Scammon Bay)	James Kaganak		558-5411	askinukcorp@yahoo.com	PO Box 89 Scammon Bay Ak 99662
Calista Corporation (Bethel)	Tisha Kuhns	VP of Land and Natural Resources		calista@calistacorp.com	301 Calista Court, Suite A, Anchorage, AK 99518-3028
Tribes *					
Native Village of Scammon Bay	Brandon Aguchak		558-6269	brandon.nvsb@gmail.com	P.O. Box 89, Scammon Bay, AK 99662

From:	Brooke A. Therrien
To:	Brooke A. Therrien
Subject:	FW: Scammon Bay Bulk Fuel Upgrade: Request for Comments
Date:	Wednesday, July 07, 2021 3:59:20 PM
Attachments:	image001.png Scammon Bay BFU_Agency Letter_4.19.21.pdf

---

From: Wiegers, Janice K (DEC) <janice.wiegers@alaska.gov>
Sent: Monday, April 19, 2021 2:44 PM
To: Owen L. Means <omeans@hdlalaska.com>
Cc: Buss, Stephanie D (DEC) <stephanie.buss@alaska.gov>; Guintu, Randy R (DEC) <randy.guintu@alaska.gov>; Kusche, Kara C (DEC) <kara.kusche@alaska.gov>
Subject: FW: Scammon Bay Bulk Fuel Upgrade: Request for Comments

Hello Owen,

The tank farm that you are referring to is a contaminated site known as Scammon Bay Askinuk Corp Tank Farm (haz ID 26910). Randy Guintu is the DEC staff assigned to the site so I have copied him here. DEC approval before disposing of or moving contaminated soil/groundwater off the contaminated site is required (18 AAC 75.325(i)), and a cleanup plan may also be required, depending on what activities will occur at the old tank farm.

For future reference, DEC provides resources for researching Contaminated Sites and Groundwater Plumes at http://dec.alaska.gov/spar/csp/ through the Search Map and Search Database buttons. Please review information on the Database, including the Site Chronology, Closure Details, and Documents. If you have questions about a specific site or contaminated groundwater plume, contact the Staff person listed for the site or plume directly. Additional documents can be requested.

Technical guidance can be found at https://dec.alaska.gov/spar/csp/guidance-forms/.

Janice Wiegers
Alaska Department of Environmental Conservation
Contaminated Sites Program
610 University Avenue
Fairbanks, Alaska 99709
Phone: (907) 451-2127
Email: janice.wiegers@alaska.gov

From: Owen L. Means <omeans@hdlalaska.com>
Sent: Monday, April 19, 2021 11:47 AM
To: Buss, Stephanie D (DEC) <stephanie.buss@alaska.gov>
Subject: FW: Scammon Bay Bulk Fuel Upgrade: Request for Comments

Dear Ms. Buss,

I am forwarding you this email because your agency may have an interest in the subject project and I

received a non-delivery notification resulting from my email to Grant Lidren.

Respectfully,
Owen

Owen Means
Environmental Specialist

3335 Arctic Blvd, Suite 100 | Anchorage, Alaska 99503
main 907-564-2120 | direct 907-564-2143 | cell 907-441-7142
OMeans@HDLAlaska.com | www.HDLAlaska.com

From: Owen L. Means
Sent: Monday, April 19, 2021 11:37 AM
To: 'jimmy.smith@alaska.gov' <jimmy.smith@alaska.gov>; 'dec.webmaster@alaska.gov' <dec.webmaster@alaska.gov>; 'Aldrich, Lori (DEC)' <lori.aldrich@alaska.gov>; 'grant.lidren@alaska.gov' <grant.lidren@alaska.gov>; 'jim.rypkema@alaska.gov' <jim.rypkema@alaska.gov>; 'cindy.heil@alaska.gov' <cindy.heil@alaska.gov>; 'dfg.hab.infoanc@alaska.gov' <dfg.hab.infoanc@alaska.gov>; 'tammy.davis@alaska.gov' <tammy.davis@alaska.gov>; 'pamela.russell@alaska.gov' <pamela.russell@alaska.gov>; 'oha.revcomp@alaska.gov' <oha.revcomp@alaska.gov>; 'regpagemaster@usace.army.mil' <regpagemaster@usace.army.mil>; 'vaughan.molly@epa.gov' <vaughan.molly@epa.gov>; 'douglass_cooper@fws.gov' <douglass_cooper@fws.gov>; 'jordan_muir@fws.gov' <jordan_muir@fws.gov>; City of Scammon Bay <cityofscammon@marayarmiut.com>; 'askinukcorp@yahoo.com' <askinukcorp@yahoo.com>; 'calista@calistacorp.com' <calista@calistacorp.com>; Brandon Aguchak <brandon.nvsb@gmail.com>
Cc: William (Bill) Price <WPrice@akenergyauthority.org>
Subject: Scammon Bay Bulk Fuel Upgrade: Request for Comments

Dear Agency Staff,

The Alaska Energy Authority (AEA), in cooperation with the Denali Commission, is soliciting comments and information on a proposed project to replace and relocate the Askinuk Corporation's bulk fuel storage facility, in Scammon Bay, Alaska. The project's scoping materials are attached to this email.

After reviewing the attached scoping materials, please reply with the following information:

1. Further analysis needed to evaluate sensitive resources potentially impacted by the proposed project.
2. Regulatory permits and/or clearances required from your agency.
3. Any concerns or issues your agency or organization might have with the proposed

project.

We are requesting that comments be delivered by **May 20, 2021**. Comments may be emailed to omeans@hdlalaska.com. If you feel that someone else in your organization should receive this notification, please forward this email to them so they may comment.

Respectfully,

Owen Means
Environmental Specialist

3335 Arctic Blvd, Suite 100 | Anchorage, Alaska 99503
main 907-564-2120 | direct 907-564-2143 | cell 907-441-7142
OMeans@HDLAlaska.com | www.HDLAlaska.com

From:	Owen L. Means
To:	Brooke A. Therrien
Subject:	FW: Scammon Bay Bulk Fuel Upgrade: Request for Comments
Date:	Thursday, April 22, 2021 11:12:53 AM
Attachments:	image001.png

From: Askinuk Corp <askinukcorp@yahoo.com>
Sent: Thursday, April 22, 2021 10:43 AM
To: Owen L. Means <omeans@hdlalaska.com>
Subject: Re: Scammon Bay Bulk Fuel Upgrade: Request for Comments

#1. I believe all you've covered all of areas concerned. We were mainly concerned about getting out of flood area. This area never floods from tides but spring melt off comes to mind.

#2. We do not require permits or clearances for any construction companies that help us construct tank farm or any buildings. By asking to help us construct a tank farm, we are giving permission to whoever is constructing the project to drive through our streets, buying fuel or other needs from our stores and anything else to complete the project as agreed.

#3. Since the tank farm is going to be in close proximity to houses, we were worried about them complaining about fuel odors but that was answered already. Traffic and noise from engines of ATV and snowmobiles comes to mind too. Our hours are from 9:00 am until 4-5:00 pm so it wouldn't be all day and night traffic. Other than that we are excited for the new tank farm to go into service. Thank you very much for helping us.

Askinuk Corporation
James Kaganak, Mgr.
558-5411

On Monday, April 19, 2021, 11:36:52 AM AKDT, Owen L. Means <omeans@hdlalaska.com> wrote:

Dear Agency Staff,

The Alaska Energy Authority (AEA), in cooperation with the Denali Commission, is soliciting comments and information on a proposed project to replace and relocate the Askinuk Corporation's bulk fuel storage facility, in Scammon Bay, Alaska. The project's scoping materials are attached to this email.

After reviewing the attached scoping materials, please reply with the following information:

1. Further analysis needed to evaluate sensitive resources potentially impacted by the proposed project.

2. Regulatory permits and/or clearances required from your agency.

From:	Brooke A. Therrien
To:	Brooke A. Therrien
Subject:	RE: Scammon Bay Bulk Fuel Upgrade: Request for Comments
Date:	Thursday, May 20, 2021 8:45:53 AM
Attachments:	image002.png

From: Ortiz, Liz M (DNR) <liz.ortiz@alaska.gov>
Sent: Tuesday, May 11, 2021 4:37 PM
To: Owen L. Means <omeans@hdlalaska.com>
Cc: Ortiz, Liz M (DNR) <liz.ortiz@alaska.gov>
Subject: RE: Scammon Bay Bulk Fuel Upgrade: Request for Comments

3130-1R DC / 2021-00469

Good afternoon,

The Office of History and Archaeology (OHA) / Alaska State Historic Preservation Office (AK SHPO) received your review request (dated April 19, 2021) on April 22, 2021. Following review of the project documentation provided, we offer the following comments.

1. Identification efforts should be conducted by an archaeologist that meets the Secretary of the Interior standards and qualifications. The village of Scammon Bay has been continuously occupied for generations, and there is a high potential for cultural material. The modern village is atop the historic village, and there is also evidence of prehistoric settlements in and around the village. This is a multi-component site, and identifications and evaluations should be done by a professional archaeologist. Our office can provide a list of contractors to you upon request.
2. OHA requires survey or monitoring permits for projects that occur on State lands and are conducting these activities. SHPO is a consulting party for the Section 106 process.
3. Our office recommends early consultation that includes a Section 106 initiation letter from the agency with the project description and the Area of Potential Effect (APE) identified. A well-developed APE is a mapped polygon that includes the old tank farm, the new location, the route of travel through the village, the materials sources, staging areas, a buffer, etc. The initiation letter should describe the identification effort for historic properties.

Our office looks forward to continued consultation on the Scammon Bay Bulk Fuel Upgrade project. Please contact me at liz.ortiz@alaska.gov if you have questions or if we can be of further assistance.

Thank you,
Liz Ortiz

Archaeologist II - Review and Compliance
Alaska State Historic Preservation Office
Office of History and Archaeology
Department of Natural Resources

550 W. 7th Ave, Suite 1310
Anchorage AK, 99501
(907) 269-8722
liz.ortiz@alaska.gov

Due to Covid-19 concerns, we are currently teleworking. Email is the best communication method.
Be Well!

From: DNR, Parks OHA Review Compliance (DNR sponsored) <oha.revcomp@alaska.gov>
Sent: Thursday, April 22, 2021 1:30 PM
To: omeans@hdlalaska.com
Cc: Ortiz, Liz M (DNR) <liz.ortiz@alaska.gov>
Subject: FW: Scammon Bay Bulk Fuel Upgrade: Request for Comments

Good afternoon,

The Office of History and Archaeology/Alaska State Historic Preservation Office received your documentation, and its review has been assigned to Liz Ortiz under 2021-00469. We may contact you if we require additional information. Our office ordinarily has 30 calendar days after receipt to complete our review, but our office has entered tolling in response to complications from COVID-19 and our review may be delayed as a result. Please contact the project reviewer or myself by email if you have any questions or concerns.

Best,
Sarah

Sarah Meitl
Review and Compliance Coordinator
Alaska State Historic Preservation Office
Office of History and Archaeology

550 West 7th Avenue, Suite 1310
Anchorage, AK 99501-3561
Direct: 907-269-8720
sarah.meitl@alaska.gov
http://dnr.alaska.gov/parks/oha
Teleworking - Email is the best method of communication.

From: Owen L. Means <omeans@hdlalaska.com>
Sent: Monday, April 19, 2021 11:37 AM
To: Smith, Jimmy C (CED) <jimmy.smith@alaska.gov>; DEC-Webmaster (DEC sponsored)

<DEC.Webmaster@alaska.gov>; Aldrich, Lori (DEC) <lori.aldrich@alaska.gov>; grant.lidren@alaska.gov; Rypkema, James (DEC) <james.rypkema@alaska.gov>; Heil, Cynthia L (DEC) <cindy.heil@alaska.gov>; DFG, HAB InfoAnc (DFG sponsored) <dfg.hab.infoanc@alaska.gov>; Davis, Tammy J (DFG) <tammy.davis@alaska.gov>; Russell, Pamela J (DNR) <pamela.russell@alaska.gov>; DNR, Parks OHA Review Compliance (DNR sponsored) <oha.revcomp@alaska.gov>; regpagemaster@usace.army.mil; vaughan.molly@epa.gov; douglass_cooper@fws.gov; jordan_muir@fws.gov; City of Scammon Bay <cityofscammon@marayarmiut.com>; askinukcorp@yahoo.com; calista@calistacorp.com; Brandon Aguchak <brandon.nvsb@gmail.com>
Cc: Price, William J (AEA) <wprice@akenergyauthority.org>
Subject: Scammon Bay Bulk Fuel Upgrade: Request for Comments

Dear Agency Staff,

The Alaska Energy Authority (AEA), in cooperation with the Denali Commission, is soliciting comments and information on a proposed project to replace and relocate the Askinuk Corporation's bulk fuel storage facility, in Scammon Bay, Alaska. The project's scoping materials are attached to this email.

After reviewing the attached scoping materials, please reply with the following information:

1. Further analysis needed to evaluate sensitive resources potentially impacted by the proposed project.
2. Regulatory permits and/or clearances required from your agency.
3. Any concerns or issues your agency or organization might have with the proposed project.

We are requesting that comments be delivered by **May 20, 2021**. Comments may be emailed to omeans@hdlalaska.com. If you feel that someone else in your organization should receive this notification, please forward this email to them so they may comment.

Respectfully,

Owen Means
Environmental Specialist

20 YEARS HDL ENGINEERING CONSULTANTS LLC
3335 Arctic Blvd, Suite 100 | Anchorage, Alaska 99503
main 907-564-2120 | direct 907-564-2143 | cell 907-441-7142
OMeans@HDLAlaska.com | www.HDLAlaska.com

May 20, 2021

Alaska Energy Authority
c/o Owen Means
HDL Engineering Consultants
3335 Arctic Blvd, Suite 100
Anchorage, Alaska 99503

Dear Mr. Means:

The U.S. Environmental Protection Agency has reviewed the Alaska Energy Authority's April 23, 2021 letter informing us of your plan to prepare an Environmental Assessment on a proposed project to replace and relocate the Askinuk Corporation's bulk fuel storage facility (tank farm) in Scammon Bay, Alaska (EPA Region 10 Project Number 21-0024-DCOM). Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

According to the scoping notice, the purpose of the project is to provide a code-compliant tank farm with sufficient storage capacity to support the community's retail fuel needs and mitigate the risk of a major spill event. We understand that the existing tank farm is the sole retail fuel sales facility in the Community of Scammon Bay and is currently in poor condition, has inadequate containment, is in the floodplain, and is threatened by ice flows on a yearly basis. The relocation of the facility would resolve these issues.

Thank you for the opportunity to review the scoping notice for this project. If you have questions about this review, please contact Lauren Boldrick of my staff at (907) 271-5097 or boldrick.lauren@epa.gov or me at (206) 553-1774 or at chu.rebecca@epa.gov.

Sincerely,

Rebecca Chu, Chief
Policy and Environmental Review Branch

Enclosure

EPA Scoping Comments on the proposed
Askinuk Corporation's Bulk Fuel Storage Facility Project
Scammon Bay, Alaska | May 2021

Water Quality

The Clean Water Act requires any construction project resulting in the disturbance of one or more acres to obtain authorization under the construction storm water discharge permit for industrial activities. EPA recognizes that the proposed project is unlikely to significantly increase impervious surface area and will incorporate appropriate erosion control measures. Based on this information, we recommend that the EA include information on:

- Direct, indirect, and cumulative impacts from storm water discharges;
- How the project would meet the requirements of the Alaska Pollutant Discharge Elimination System permit program under the CWA, including development of Storm Water Pollution Prevention Plans, reporting, and monitoring; and
- Best management practices, erosion and sediment control, and other mitigation measures to minimize impacts.

We would also encourage the AEA to consider Low Impact Development techniques during the project construction due to their potential to reduce storm water volumes and mimic natural conditions.[1] Other measures to conserve energy and resources may include those under the Energy Independence and Security Act of 2007 and related EPA Technical Guidance on Implementing the Storm Water Runoff Requirements for Federal Projects under Section 438 of this Act.[2]

We note that it may be helpful to discuss the issues with flooding and ice flows at the existing fuel facility as part of the "No Action" alternative analysis.

Aquatic Resources

The scoping notice states that a wetland delineation was completed for the project, and indicates wetlands are present within the project area beyond the embankment of an existing gravel pad. The project is anticipated to involve dredge and/or fill within wetlands, for which the AEA will seek U.S. Army Corps of Engineers authorization. Since there are identified aquatic resources in the planning area, EPA recommends including the following data in the EA:

- Description of all waters of the U.S., including wetlands, that could be affected by the project alternatives. We recommend also identifying any navigable waters in the analysis area;
- Maps showing waterbody locations and resources likely to be impacted by the project;
- Acreages and channel lengths, habitat types, values, and functions of these waters;
- Description of the USACE permit application process and recommended measures to protect aquatic resources from impacts resulting from the proposed project;
- Mitigation plans, including compensatory mitigation required under the CWA, to reduce impacts to surface waters of the U.S; and
- Floodplain impacts and actions to be taken to minimize the impacts. Activities affecting floodplains, like wetlands, are also regulated under the CWA §404.

[1] http://www.epa.gov/polluted-runoff-nonpoint-source-pollution/urban-runoff-low-impact-development
[2] http://www.epa.gov/polluted-runoff-nonpoint-source-pollution/stormwater-management-federal-facilities-under-section-438

Permafrost and Vegetation

The proposed project may result in the disturbance of permafrost resulting from removing the overlying vegetation and organic material, placing gravel fill material on the surface for access roads and facility pads, or excavating and trenching the area to install underground facilities. EPA recommends that the EA include discussion of the following:

- Baseline information on vegetation and permafrost, including a location/mapping analysis;
- Surface disturbance activities to permafrost and vegetation and related impacts;
- Mitigation measures to minimize the project impacts to permafrost and vegetation;
- Potential introduction of invasive plants and how they would be controlled to minimize their economic, ecological, and human health impacts in the area; and
- Restoration and reclamation of disturbed areas post project construction.

Solid Waste, Hazardous Materials and Wastewater Management

As the proposed action may result in direct, indirect, and cumulative impacts due to the use of hazardous and non-hazardous materials, we recommend that the EA address these impacts. Hazardous materials such as compressed gas and petroleum products may be used and/or stored in the project area. Although proper management is presumed to be safe, concerns remain about the possibility of accidents resulting in the release of hazardous materials to the environment. EPA recommends that the EA:

- Describe measures that would be taken to minimize the chances of accidental spills or release of pollutants in the environment, and emergency response measures that would be taken should an accident occur;
- Address the applicability of state and federal hazardous materials, pollution prevention, and solid waste requirements, and appropriate mitigation measures to prevent and minimize the generation of solid and hazardous materials; and
- Assess the need to prepare and implement a Spill Prevention, Control, and Countermeasure and provide information addressing this SPCC.[3]

Endangered Species

The proposed project may impact endangered, threatened, or candidate species listed under the Endangered Species Act and their habitats. State sensitive species may also be impacted. EPA recommends that the EA:

- Identify the endangered, threatened, and candidate species under ESA, and other sensitive species within the project area and vicinity;
- Provide information on the critical habitat for the species;
- Evaluate impacts the project could have on the species and their critical habitats; and
- Describe how the proposed project will meet all requirements under ESA, including consultation with the U.S. Fish and Wildlife Service.

[3] https://www.epa.gov/sites/production/files/2014-04/documents/b_40cfr112.pdf

Cumulative Effects
EPA recommends the EA include an assessment of the cumulative impacts that would be associated with the proposed action, specifically, five key areas:

- Resources, if any, that are being cumulatively impacted;
- Appropriate geographic area and the time over which the effects have occurred and will occur;
- All past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern;
- A benchmark or baseline of existing environmental conditions; and
- Scientifically defensible threshold levels.

Climate Change
EPA recommends that the EA include a discussion of reasonably foreseeable effects that changes in the climate may have on the proposed project and the project area. This could help inform the development of measures to improve the resilience of the project. If projected changes could notably exacerbate the environmental impacts of the project, EPA recommends these impacts also be considered as part of the NEPA analysis.

Coordination with Tribal Governments
EPA recommends the EA describe the process and outcome of government-to-government consultation between AEA and each of the tribal governments that may be affected by the project, issues that were raised, if any, and how those issues were addressed.

Environmental Justice and Public Participation
Because the project location is in a community with environmental justice concerns, EPA recommends that the EA address the potential for disproportionate adverse impacts to the community. One tool available to locate communities with Environmental Justice characteristics is EPA's Environmental Justice Screening and Mapping Tool or EJSCREEN.[4]

Please also note that if pesticides and herbicides will be used during implementation of the proposed project, then we recommend that the EA address any potential toxic hazards related to the application of the chemicals and describe what actions will be taken to ensure that impacts by toxic substances released to the environment will be minimized. It is important to recognize the potential impacts to subsistence communities through potential exposure pathways such as game meat processing, surface water contact during fishing, and sediment disturbance from food gathering.

[4] https://www.epa.gov/ejscreen