CEPOA-EN-CW-ER

MEMORANDUM FOR RECORD

SUBJECT: Environmental Compliance Status, 2006 FUDS and NALEMP Activities at Gambell.

- 1. This memorandum summarizes the environmental compliance review and NEPA status of the FUDS and NALEMP environmental cleanup activities planned in and around Gambell for the summer of 2006.
- 2. After a review of the FUDS and NALEMP 2006 work plans, Chris Floyd and Guy McConnell of CEPOA-EN-CW-ER determined that the proposed activities are a continuation of recent previous work in the Gambell area and constitute only a minor expansion of the activities covered by the 1998 EA. Two proposed activities not specifically described in the EA include (a) the removal of scattered submerged debris from nearshore areas of the Bering Sea and Troutman Lake, and (b) excavation of deeply-buried demolition debris from a site adjacent to the current village landfill. Debris removal from Troutman Lake and the Bering Sea will be a continuation of the debris collection and removal that has occurred on immediately adjacent tidelands. The removal of submerged debris will be accomplished by hand, or by draglines attached to the debris and hauled in to shore. The site adjacent to the landfill (Site 23) was a disposal area for military metallic debris unearthed during the construction of Gambell High School. The buried debris now threatens to interfere with the operation and expansion of the village landfill, and will be excavated and transported away from St. Lawrence Island for disposal. This activity is thus a direct continuation of previous debris removal efforts in the Gambell area.

Chris Floyd contacted the Alaska Department of Natural Resources, and informed them of the proposed work and of potential deviations from the EA. The OPMP initiated a 10-day ACMP comment period on the proposed changes. No comments were received, and the OPMP issued a letter (ID 2006-0651AA, dated 12 July 2006, signed by Nicole Allison) stating that no further ACMP consistency review is required.

- 3. Chris Floyd consulted with CEPOA-CO-R-N (Don Rice and Alan Skinner) on CWA Section 404(b)(1) requirements. Recent site photographs of the proposed project sites were available from CEPOA-EN-EE (Lisa Geist). The Regulatory specialists concluded that the proposed activities would not constitute discharge or fill-placement into waters of the United States pursuant to Section 404(b)(1), in that (a) most of the sites could not be considered wetlands due to sparse or absent vegetation and very coarse soils, and (b) no filling is proposed for those areas that potentially could be wetland.
- 4. CEPOA-EN-CW-ER determined that no species listed under the ESA will be affected by the proposed project activities. The project sites are close to the village, and in areas already significantly impacted by human activity. There are two Steller sea lion haulout

sites on St. Lawrence Island listed as Critical Habitat areas, but these sites are far removed from the project areas. Marine mammals would not be affected by the proposed activities. Chris Floyd contacted the NMFS for recommendations on Essential Fish Habitat (EFH), in a letter dated 22 June 2006. The NMFS responded in an email memorandum (dated 6 July 2006, from Donna Graham), stating that it had determined that the proposed activities will not result in any adverse effect to EFH and further EFH consultation is not necessary.

- 5. CEPOA-EN-CW-ER archaeologist Margan Grover provided a letter (dated 22 June 2006) to the State Historic Preservation Officer, listing the proposed project sites, describing the status of cultural resources at the sites, and requesting concurrence that no historic properties will be affected, and no historic properties will be adversely affected, by the proposed activities. The letter also states that an individual from the local community will be selected by the Native Village of Gambell to monitor project activities for possible impacts to cultural resources. The response period for this letter ends on 28 July 2006; no response has yet been received from SHPO.
- 6. The proposed activities are within the scope of activities addressed in the 1998 EA and FONSI. The additional activities are minor, local expansions of those activities, that have no potential for significant effects to the environment.
- 7. CEPOA-EN-CW-ER has concluded that NEPA planning and other environmental compliance and coordination requirements have been satisfied for the 2006 project activities, and that no further coordination or documentation is necessary. Project activities in areas of potential historical concern (e.g., Sites 8B and 21) will not proceed until the SHPO response period has ended, and any comments from SHPO addressed. The submerged debris removal and excavation of Site 23 will also be delayed until the SHPO response period has ended.

Chris Floyd
NEPA Planner

CONCUR:

McConnell OBF For GM

Cossaboom C

CEPOA-OC M



DEPARTMENT OF THE ARMY

U.S. ARMY ENGINEER DISTRICT, ALASKA P.O. BOX 6898 Elmendorf AFB, ALASKA 99506-0898

JUN 22 2006

Environmental Resources Section

Ms. Jeanne Hanson National Marine Fisheries Service 222 West Seventh Avenue, Box 43 Anchorage, Alaska 99513-0077

Dear Ms. Hanson:

The Alaska District, U.S. Army Corps of Engineers has been involved in the continuing cleanup of debris and contaminated soil left by past military activities in and near the Native Village of Gambell on St. Lawrence Island (Figures 1 and 2). Cleanup activities under consideration for the summer of 2006 include the removal of submerged metallic debris, such as steel matting, drums, and wire, from nearshore areas of the Bering Sea and Troutman Lake (shown as Areas 1C and 15, respectively, on Figure 2), as well as the excavation of buried debris and contaminated soil from several onshore sites (areas shaded in red on Figure 2). Scheduled commercial barges landing at established barge landing sites at Gambell will be used to land equipment and supplies, and to transport debris and containerized waste material away from St. Lawrence Island.

We request recommendations concerning potential impacts to Essential Fish Habitat. We have reviewed the information at the NMFS interactive EFH website, and find that Pacific salmon is the only species for which EFH has been designated near the project area.

Thank you for your cooperation. If you need more information, please contact Mr. Chris Floyd at (907) 753-2700, or by e-mail at: Christopher.B.Floyd@poa02.usace. army.mil.

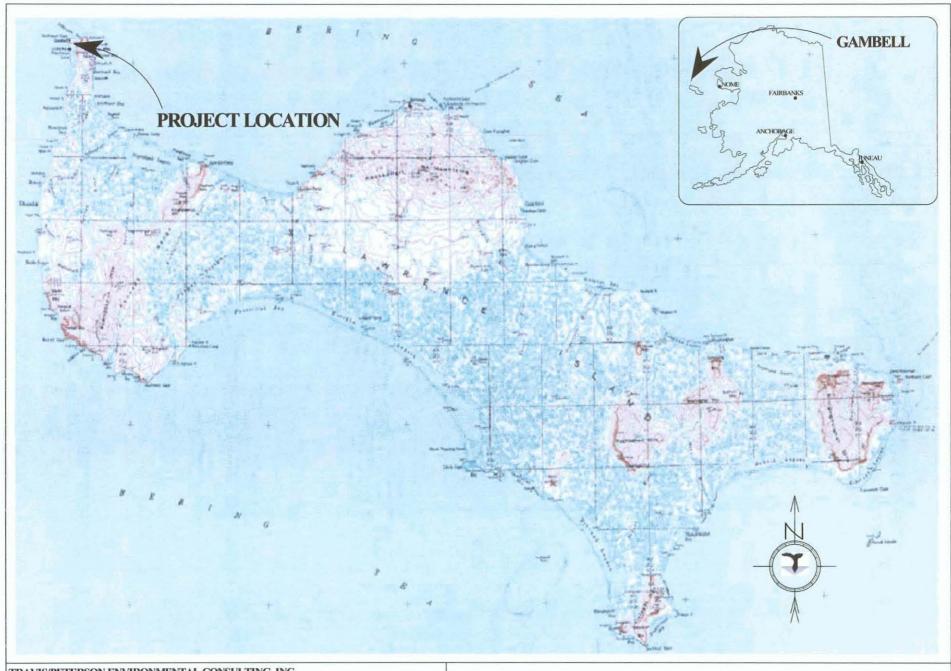
Sincerely,

Guy R. McConnell

Chief, Environmental Resources Section

Thy RM County

Enclosure



TRAVIS/PETERSON ENVIRONMENTAL CONSULTING, INC. 3305 ARCTIC BOULEVARD SUITE 102 ANCHORAGE, ALASKA 99503

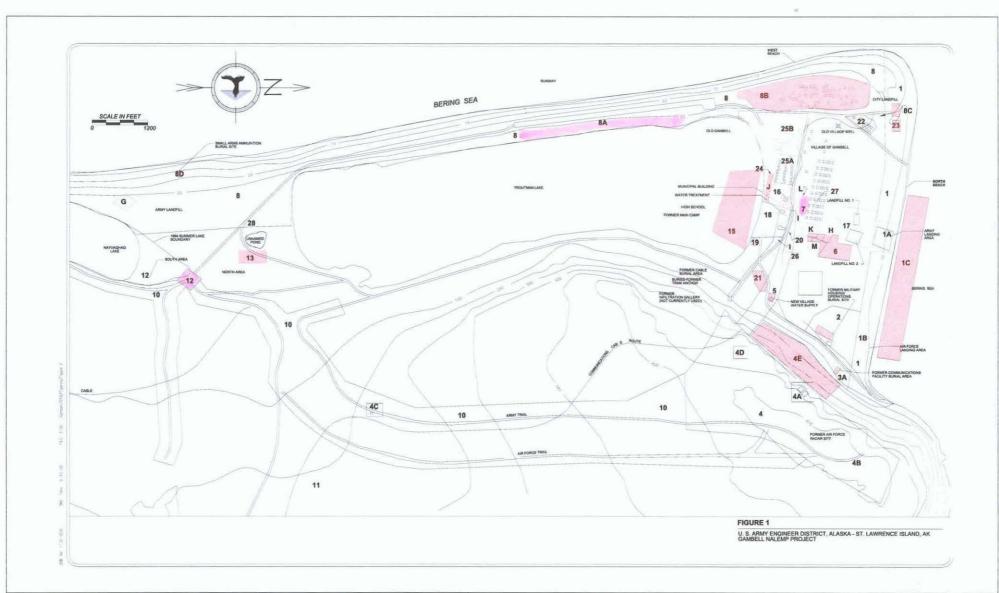
FIGURE 1 LOCATION & VICINITY

PROJECT No: 1132-05C

FILE: 1132 - Gambell/05B - Work Plan & 2006 Field Work/Figures/Figure 1

DATE: 1-24-06

SCALE: AS SHOWN



TRAVIS/PETERSON ENVIRONMENTAL CONSULTING, INC. 3305 ARCTIC BOULEVARD SUITE 102 ANCHORAGE, ALASKA 99503

ANCHORAGE, ALASKA 99503
PROJECT No: 1132-05B

NATIVE VILLAGE OF GAMBELL

FIGURE 2 2006 SITES

FILE: 1132 - Gambell/05B/Figures/Figure 2

DATE: 5-15-06

SCALE: AS SHOWN