

# STATE OF ALASKA

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January 12, 2001

Ms. Claire Caldes  
U.S. Fish and Wildlife Service  
Alaska Maritime National Wildlife Refuge  
2355 Kachemak Bay Drive, Suite 101  
Homer, AK 99603

Dear Ms. Caldes:

The State of Alaska has reviewed the U.S. Fish and Wildlife Service December 2000 Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for remedial/removal actions this summer on Amchitka Island. The State appreciates this opportunity to review the EA, as well as the Service's continuing efforts to integrate State involvement in refuge planning. This letter represents the consolidated views of State of Alaska agencies.

While the purpose of the EA is not to evaluate the proposed cleanup alternatives technically, the final FONSI should state that "The Alaska Department of Environmental Conservation (ADEC) is reviewing the responsible parties' proposed cleanup actions and will comment on each agency's work plans." Section 1.0 of the EA, Purpose and Need of the Proposed Action, second paragraph does not inform readers clearly that proposed cleanup efforts will not address any subsurface radioactive contamination resulting from underground nuclear tests. Please clarify this in the final FONSI.

The final FONSI should inform readers that the Longshot mud pits, which the DOE proposes to close in place, were contaminated by radionuclides, principally tritium, after the Longshot tests. Levels have declined over time and, while now below EPA drinking water levels, remain above background. ADEC expects that DOE will address the issue in the work plan, and health and safety plan so that any worker exposure is kept as low as reasonably achievable (ALARA).

ADEC wishes to evaluate the 15 shallow groundwater monitoring wells (3.3.2.1, paragraph 3) for their usefulness prior to their closing, and may request sampling of selected wells for petroleum or solvent contamination.

We support removing from State-owned tidelands all abandoned facilities, which represent potential hazards to navigation, potential liabilities, and potential water pollution. However, it is difficult to ascertain from the EA exactly what facilities on tidelands are proposed for removal. Section 3.3. of the EA, Proposed Action, refers to plans to demolish over 50 structures, but section 3.3.2.3 refers only to buildings, not piers or wharves. Figure 9 shows at least three facilities on Constantine Harbor tidelands, (structures B1, B2, and B11). The Service has expressed interest in keeping one of these docks for future access, but the other abandoned facilities should be demolished. Certain activities on State-owned tidelands may require authorization from the Alaska Department of Natural Resources (ADNR). Typically, ADNR has issued the Army Corps of Engineers (COE) a letter of non-objection with stipulations. The COE or Service should contact Mary Walter of the ADNR Southcentral Regional Office at 269-8568.

A sizeable amount of logged drilling core samples, taken for the underground nuclear testing program at Amchitka and possibly still the property of the USGS, remain stored at the damaged South Hangar. Deep cores (+500 feet) may have high scientific value in determining the geological history of this region. To assess accurately the salvage value of these cores and determine if they have historical and/or scientific value, the Service should contact Dr. John C. Eichelberger, Professor of Volcanology, Alaska Volcano Observatory, Geophysical Institute, Fairbanks (907-474-5530), and Mr. John Reeder, USGS Chief of Geologic Materials (907-696-0079).

The regulations in Appendix C do not provide information necessary to review the applicability of the categorical exclusion. To this end, please include the "Record of Categorical Exclusion" in the final FONSI.

Please note regarding Appendix D: Drinking water regulations apply to groundwater on Amchitka unless the Responsible Party adequately defends the criteria outlined in 18 AAC 75.350. State environmental regulations apply directly to the non-National Priority List site cleanup on Amchitka, not just "in parallel" with a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) framework.

The document adequately identifies fish and wildlife resources in the project area and identifies mitigating measures that, if followed, should avoid or minimize adverse impacts to these resources. The Alaska Department of Fish and Game will evaluate separate action plans the Department of Energy, the U.S. Army Corps of Engineers, and the Navy submits to determine if Fish Habitat Permits are needed for activities in or near fish-bearing waters.

Because we trust this project would have a positive environmental impact, the State does not believe an Environmental Impact Statement is necessary and supports the FONSI. Thank you again for this important review opportunity.

Sincerely,

Tom Atkinson  
Project Review Coordinator

cc: Patrick Galvin, Director, DGC, Juneau  
John Katz, Governor's Office, Washington, D.C.  
John Sisk, Governor's Office, Juneau  
Frank Rue, Commissioner, Department of Fish and Game, Juneau  
Pat Pourchot, Commissioner, Department of Natural Resources, Juneau  
Joseph Perkins, Commissioner, Department of Transportation, Juneau  
Wayne Crayton, COE, Anchorage  
Ken Rice, Planning Chief, USFWS, Anchorage