Environmental Assessment

for the

Expansion of Aircraft Parking Ramps E-7 and E-8

Eielson Air Force Base, Alaska

354th Fighter Wing December 2003

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FINDING OF NO SIGNIFICANT IMPACT (FONSI) and FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA) for the EXPANSION OF THE E-7 AND E-8 PARKING RAMPS

Introduction

Eielson Air Force Base (Eielson) is proposing to expand parking and refueling facilities in the Loop taxiway area. This expansion of parking facilities is critically needed due to the increased traffic of Air Force wide-bodied aircraft that utilize Eielson runway facilities. Taxiing and refueling of aircraft in the Loop area is severely restricted by limited parking ramp space and can result in congestion that interferes with mission operations.

Description of the Proposed Action

The proposed action would result in the expansion of paved areas in association with the E-7 and E-8 parking ramps. The existing ramps and taxiway L paved areas would be increased from 1,820,013 square feet to 3,118,805 square feet. This would also increase the number of parking spaces for C-17 sized aircraft from six to sixteen. This action would result in the filling of 6.5 acres of black spruce scrub/shrub wetlands.

Alternatives to the Proposed Action

One alternative to the proposed action was identified. This alternative would result in the expansion of the E-7 and E-8 parking ramps on the northeast side of the existing ramps. The expansion would be of similar size, but would be configured differently. Expansion in this direction would only allow parking spaces for 10 aircraft. Two existing pump houses would have to be relocated. This alternative would result in no loss of wetlands.

No Action Alternative

This alternative would result in no expansion of aircraft parking facilities in the E-7 and E-8 ramp areas. Existing shortages of parking and fueling locations would remain, and congestion associated with aircraft movement would continue.

Environmental Impacts of the Proposed Action

Wetlands and Floodplains

The proposed project would result in impacts to 6.5 acres of black spruce and willow/alder wetlands. The wetlands are of relatively low-value and are isolated from adjacent similar habitat. Any wildlife that uses the wetlands would likely be displaced to adjacent wetlands similar to those that currently exist near the site.

The project does not lie within the 100-year floodplain.

Cultural Resources

No cultural resources have been identified in the project area. However, should any be uncovered, all construction would cease until an archeologist evaluates the resource.

Biological Resources

Impacts to biological resources from the Proposed Project would be minimal. Habitat impacted is a type that commonly occurs in large tracts near the project. It is likely that the few wildlife species that currently use the area would be displaced to this nearby habitat. Some small mammals such as squirrels and voles would be displaced. In addition, some passerine bird use of the larger wetland tract would likely be eliminated.

Threatened or Endangered Species

There are no threatened or endangered species in the project area. The project area is not suitable habitat for any of the threatened or endangered species occurring in the Alaskan interior.

Historical or Cultural Resources

Most archeological sites on Eielson lands have been identified and mapped. The Proposed Project is not associated with any known sites. In the event that historic or cultural sites are discovered during project construction, activities will be halted and a professional archeologist will evaluate the find.

Air Quality

The proposed actions will have minor air quality impacts during construction due to fugitive dust and machinery exhaust. Such impacts will be highly localized and temporary in nature.

Mitigation

No special conditions (mitigation) other than standard best management practices that are already incorporated into the project design are required by any federal or state agency for impacts that may result from this project.

Public Comment

No public comment was received from the public noticing of the EA/FONSI/FONPA or the Corps of Engineers Permit for this project.

Findings

Pursuant to the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) implementing regulations for NEPA (40 CFR Part 1500-1508), and Air Force Instruction (AFI) 32-7061, *Environmental Impact Analysis Process* (32 CFR Part 989), the Air Force has conducted an EA for the expansion of the E-7 and E-8 parking ramps. This FONSI/FONPA has been developed pursuant to information provided in the accompanying EA.

Finding of No Practicable Alternative: Eiclson is an Air Force facility that operates, maintains, and trains combat forces in close air support of military operations worldwide. Eiclson must have efficiently operated aircraft parking and refueling facilities to meet its strategic mission. Taking all the environmental, economic, and other pertinent factors into account, pursuant to Executive Order 11990, the authority delegated by SAFO 780-1, and taking into consideration the submitted information, I find that there is no practicable alternative to this action and the proposed action includes all practical measures to minimize harm to the environment.

Finding of No Significant Impact: Based on this environmental assessment, which was conducted in accordance with the requirements of NEPA, CEQ, and Air Force Instructions, I conclude expansion of the E-7 and E-8 aircraft parking ramps will not result in significant impacts to the environment. I also find that the preparation of an environmental impact statement is not warranted.

VICTOR E. RENUART, JR. Lieutenant General Vice Commander, Pacific Air Forces

FEB 0 4 2004

Date

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1.0 Purpose and Need for the Action

Section 1.0 provides a description of the purpose and need for the proposed action and its alternatives.

1.1 Background and Objectives for the Proposed Action and Alternatives

1.1.1 The host unit at Eielson Air Force Base (Eielson), the 354th Fighter Wing, operates F-16 Fighting Falcon aircraft and OA-10 Thunderbolts. The 168th Air Refueling Wing (Air National Guard) is also based at Eielson and currently flies KC-135 aircraft. In addition, since Alaska ranges are the closest US-controlled tactical flying training areas available to Pacific Air Command Air Forces (PACAF) and US allies in the Pacific, large numbers of aircraft are frequently deployed to Eielson to participate in joint/combined training and Major Flying Exercises (MFE). Assigned aircraft, along with the transient aircraft that utilize the base airfield, account for more than 13,000 sorties (take-offs and landings) during an average year.

1.1.2 The large number of assigned and transient aircraft that utilize Eielson aircraft facilities requires extensive runway, taxiway, parking and refueling areas. Due to Eielson's use by the Air Mobility Command aircraft, particularly the wide-bodied C-5s and C-17s, there is a need for more parking and apron space than is currently available. The area in most critical need for parking expansion is the southern portion of the taxiway loop, specifically areas E-7 and E-8. At the present time, these ramp areas provide only 6 refueling outlets.

1.1.3 Loop parking areas E-7 and E-8 are currently separated by taxiway L. At the present time, due to limited parking space, aircraft traffic patterns do not allow movement of aircraft into and out of the refueling areas while other aircraft are parked on the ramp for refueling. This creates backups and delays for aircraft, especially during peak traffic periods.

1.1.4 To address these facility deficiencies, Eielson is proposing a major expansion of parking ramps E-7 and E-8. This ramp expansion project will not only increase the number of aircraft parking spaces, but it will also increase the number of hydrant refueling outlets available.

1.2 Location of the Proposed Action

1.2.1 Eielson is located in the Tanana River Valley on a low, relatively flat, floodplain terrace that is approximately 2 miles north of the active river channel. Other communities near Eielson include Moose Creek to the north and Salcha to the south.

1.2.2 Base lands include 19,790 contiguous acres bounded on the west by the Richardson Highway and on the north and east by Army lands (Yukon Training Area).



REGIONAL AND BASE LOCATION MAPS

Figure 1-1 Base Location Map

To the south, the community of Salcha borders Eielson. The developed portion of Eielson is primarily an area filled by gravel to elevate potential building sites above the 100-year floodplain of nearby watersheds. In addition, more than 90 percent of the lands that constitute Eielson were at one time wetlands. Of the remaining undeveloped portions of the base, 70 percent are wetlands. As a consequence, land planning and utilization of Eielson lands becomes very difficult if one is to entirely avoid siting facilities in wetlands and floodplains.

1.2.3 The proposed project to expand the Loop's E-7 and E-8 parking ramp areas would be sited in the southeast portion of the base and would impact approximately 6.5 acres of black spruce wetlands. An attempt was made to try and site this project so that it would avoid wetlands, but due to the limited uplands available in the area, avoiding wetlands constructing the proposed project was virtually impossible.

1.3 Proposed Action

The proposed action would result in the expansion of paved areas in association with the E-7 and E-8 parking ramps. The existing ramps and taxiway L paved areas would be increased from 1,820,013 square feet to 3,118,805 square feet. This would also increase the number of parking spaces for C-17 sized aircraft from six to sixteen.

1.4 Alternative to the Proposed Action

Alternative 1 – Expand Ramps E-7 and E-8 to the Northeast instead of the Southwest

This alternative would result in the expansion of the E-7 and E-8 parking ramps on the northeast side of the existing ramps. The expansion would be of similar size, but would be configured differently. Expansion in this direction would only allow parking for 10 aircraft. Two existing pump houses would have to be relocated. This alternative would result in no loss of wetlands.

1.5 No Action Alternative

This alternative would result in no expansion of aircraft parking facilities in the E-7 and E-8 ramp areas. Existing shortages of parking and fueling locations would remain, and congestion associated with aircraft movement would continue.



Figure 1-2 – Project Area

1.6 Environmental Documentation that Influences the Scope of this **Environmental Assessment**

1.6.1 Environmental Assessment of the Proposed Conversion to F-16C/D Squadron, Eielson AFB, AK, 1991. In 1991 this EA was written to assess the impacts of converting A-10 aircraft, then currently assigned to Eielson, to F-16 C/D aircraft. Issues associated with this conversion were addressed including airspace, socio-economic impacts. aircraft noise, and military manning.

1.6.2 Alaska Military Operations Areas-Environmental Impact Statement (EIS) 11th Air Force, 1995. This EIS was prepared in 1995 to address the environmental impacts of restructuring the Air Force Special Use Airspace in Alaska. This document assesses several issues pertinent to the operation of Eielson, including airspace management, biological resources, land use, air quality, and noise as they relate to operation of military aircraft on and near Eielson.

1.7 Decision to be Made

1.7.1 As required by 32 CFR Part 989, the Environmental Impact Analysis Process will be used to determine what are the environmental consequences of the proposed construction of expanding E-7 and E-8 parking ramps. This EA is intended to satisfy these requirements. The proposed action and all alternatives listed in Sections 1.3 will be addressed in detail in Chapter 2.0 of this document. A description of the resources associated with the areas affected by all alternatives will be provided in Chapter 3.0 and the impacts that could result from each one are discussed in Chapter 4.0.

1.7.2 Based on the evaluation of impacts in the EA, a Finding Of No Significant Impact (FONSI) will be published if there is a finding of no significant environmental impacts for the proposed action. If it is determined that the proposed action will have significant environmental impacts, other alternatives will be considered for which impacts may not reach the threshold of significance.

1.7.3 The EA, a draft FONSI (if applicable), and all other appropriate planning documents will be provided to the Pacific Air Forces (PACAF) Vice Commander, the decision maker, for review and consideration. If, based on a review by the decision maker of all pertinent information, a FONSI is proposed, a notice of intent (NOI) will be published in accordance with 40 CFR 1506.6. All interested parties will have 30 days to comment on the decision to the Air Force. If, at the end of the 30-day public comment period, no substantive comments are received, the decision maker will sign the FONSI.

1.7.4 An Executive Order (EO), 11988, requires the heads of federal agencies to find that there is no practicable alternative before the agency takes certain actions impacting wetlands. The proposed action would impact wetland resources. To address this requirement, the Secretary of the Air Force's designated agent, HQ PACAF/CV will sign a document that addresses the issues of wetlands that may be associated with actions

the Air Force proposes to take. This document, known as a FONPA, will state which alternative, the proposed action, alternative 1, or the no action alternative, will be selected as the appropriate course of action. The FONPA will be combined with the FONSI into one document. It will contain documentation that there are no practicable measures to minimize harm to wetlands, and that all appropriate mitigation will be incorporated into the project design or otherwise authorized.

1.8 Project Scoping/Significant Issues

This section provides a summary of major issues raised during the scoping process that were considered significant enough to be addressed in the EA. The scoping process typically involves a meeting of potentially interested parties. These may include state and federal regulatory agencies that have oversight authority, as well as base groups that have involvement in the management of Eielson aircraft. For this project scoping process all potentially interested parties were contacted. However, no parties other than Eielson groups chose to participate beyond providing comments to the Army Corps of Engineers on the 404 wetlands permit. The following issues were identified during the scoping process:

Extremely limited options for ramp expansion were identified. Several constraints associated with expanding the ramp in the proposed area were identified, severely limiting options. The two main constraints are physical constraints (i.e. wetlands, position of other facilities) and safety concerns (explosive ordnance clearances). A non-wetland alternative is included for analysis in the EA, but if implemented, it would result in a reduced project (12 parking spaces instead of 16 parking spaces) and also require that two existing fuel pump houses be relocated.

Wetland resources will be impacted. When siting facilities, project planners try to avoid impacting wetlands. This, however, can be very difficult due to the preponderance of wetlands on Eielson lands (70 per cent of the base's undeveloped lands are designated wetlands). The type of wetland that will be impacted, black spruce scrub/shrub, is a relatively low value wetland type.

There is an acute shortage of parking and refueling facilities on Eielson. The current number and configuration of parking and refueling facilities at Eielson creates significant delays in handling of aircraft during peak traffic times, especially during exercises and when Air Mobility Command's wide-bodied aircraft are utilizing Eielson's facilities. This project is intended to alleviate this problem.

1.9 Federal, State, and Local Permits Needed for Project Implementation. Actions identified in this EA would require that certain permits be obtained. The Proposed Action would require an Army Corps of Engineers 404 wetlands permit.

2.0 Description of the Proposed Action and Alternatives

Chapter 2.0 provides a description of alternatives considered for the purpose and need described in Chapter 1.0. The proposed action, one action alternative, and a no action alternative are addressed.

2.1 Proposed Action

Expand E-7 and E-8 Parking Ramps to the Southwest to Accommodate 16 Parking and Refueling Spaces

2.1.1 The proposed action would result in a major expansion of existing ramp parking space in the Loop Taxiway area. There are currently six hydrant refueling outlets in the southern portion or the Loop Taxiway (areas E-7 and E-8, separated by Taxiway L). To expand the available parking/refueling space available, the ramp will be expanded to accommodate a total of sixteen C-17 aircraft parked concurrently. Pavement will also be expanded to provide clearances that will allow C-5 aircraft to taxi while C-5s are parked on the ramp. Aircraft traffic patterns will allow movement of aircraft into and out of the refueling area while other aircraft are parked on the ramp for refueling.

2.1.2 The expansion of the ramp pavement at E-7 and E-8 would result in the following pavement quantity changes:

	·	-	C .	Existing Pavement	New Pavement
Concrete				128,026 sq. ft.	560,000 sq. ft.
Asphalt			1	I,820,013 sq. ft.	2,558,805 sq. ft.



Figure 2-1 – Proposed Project

2.1.3 The proposed project would result in the filling of 6.5 acres of black spruce scrub/shrub wetlands as depicted in **Figure 2-1**.

Notes:

- 1. 6,453 acres of 100-year floodplains
- 2. 9,435 acres of vegetated wetlands
- 3. 792 acres of lakes, ponds and streams



2.2 Alternative to the Proposed Project

Alternative 1 – Expand E-7 and E-8 Parking Ramps to the Northeast of the Existing Ramps

2.2.1 The process of developing alternatives for the purpose and need stated in Chapter 1 was made difficult by the lack of feasible options that could be considered. There are several reasons for this, but foremost is the extremely limited open land available for use to expand the flight line. **Figure 2-2** shows the base wide distribution of wetlands. As is readily seen, any expansion of existing base facilities would likely require filling of wetlands. This is especially true at the south end of the base in the vicinity of the Loop Taxiway.

2.2.1 This alternative would utilize limited space to the northeast of the existing ramp to expand parking and refueling areas from 6 spaces to 10 spaces. This alternative would not result in as much expansion of runway parking area, thus still leaving Eielson aircraft operations short of the required parking space to efficiently handle aircraft. Expansion of the pavement would be done to the maximum extent allowable within the constraints created by adjacent facilities and explosive ordinance safety criteria.

2.2.2 To accommodate the expansion of the ramps, two existing pump house facilities would have to be relocated. Relocation would entail removal and reconstruction nearby. Relocation of existing fuel lines would also be required. No wetlands would be impacted by this alternative.



Figure 2-3 – Alternative 1

2.3 No Action Alternative

This alternative would result in no ramp construction being undertaken and no additional re-fueling outlets being provided.

3.0 Affected Environment

This section describes relevant resource components of the existing environment that might be impacted by the proposed project and its alternatives. Only environmental components relevant to the issues and objectives of this EA are described.

3.1 Physical Environment

Eielson encompasses approximately 19,790 acres and is isolated from major urban areas. The portion of Eielson that contains the project areas associated with the Proposed Action and Alternative 1 lies on the abandoned floodplain of the Tanana River, with elevations ranging from 525 to 550 feet above Mean Sea Level (MSL). The surface of the floodplain is relatively smooth and slopes gently downward to the northwest at a gradient of about 6 feet per mile

3.1.1 Geology

The area in the vicinity of Eielson was not glaciated during the last ice age. The majority of the subsurface geologic formations of the central plateau of Alaska are primarily from the Permian and Devonian periods of the Paleozoic era. The hills to the northeast of the base are composed of Precambrian and Paleozoic-age schists, micaceous quartzites, and subordinate phyllite and marble. These formations have been locally intruded by a series of Cretaceous lower tertiary intrusions.

3.1.2 Soils

Soils in the Tanana River Valley consist of unconsolidated silty sands and gravels, organic and sandy silts, and clays. Floodplain soils nearest the active channels are sandy with a thin silt loam layer on the surface. On higher terraces, the soils become predominately silt from the Salchaket series. Along older river terraces, silt loam soils, which contain significant organic components, often dominate. These soils tend to be cold and wet and are generally underlain by permafrost. Approximately two-thirds of Eielson is covered with soils containing discontinuous permafrost. This preponderance of permafrost soils contributes to the large percentage of vegetated wetlands occurring on undeveloped base lands.

3.1.3 Groundwater

Eielson is located over a shallow unconfined aquifer. The aquifer is approximately 250 feet thick, extends to bedrock, and has a regional gradient of about 5 feet per mile flowing to the north-northwest. The water table varies from the surface in adjacent wetlands to 10 feet below ground level in developed areas. The base uses the local aquifer for its drinking water and monitors groundwater quality in a number of locations as part of its Installation Restoration Program. Localized contamination of the aquifer has been identified in the industrial area of the base, but the overall quality of groundwater at Eielson is good.

3.1.4 Surface Water

3.1.4.1 Aquatic bodies on Eielson include streams, wetlands, and lakes. There are approximately 28 miles of streams; 10,133 acres of wetlands; 12 lakes (Lilly Lake is natural and the remaining 11 are man-made); 80 ponds (10 naturally-occurring and 70 man-made) totaling 560 acres; and 6,770 acres of floodplains on the main base. The man-made lakes and ponds were created during the excavation of gravel deposits for use as fill material for construction projects on base. Surface drainage on Eielson is generally in a north-northwest direction and parallel to the Tanana River. Five streams flow through the base and discharge into the Tanana River via Piledriver Slough.

3.1.4.2 Approximately 51 percent, or 10,133 acres, of Eielson is classified as wetlands, with 9,391 acres being vegetated wetlands and the remainder being lakes, ponds, and streams. Wetlands and low gradient alluvial streams comprise most of the surface water resources on Eielson, with wetlands dominating the low-lying areas within and surrounding the installation. Most wetland areas were created as a result of surface waters becoming trapped in the thawed layer over the permanently frozen subsurface (permafrost). Flood periods tend to occur during spring snowmelt and during the middle to late summer, when heavy rains or warm air quickly brings glacier fed mountain streams to flood capacity. Several lakes and extensive wetlands surround the airfield in the cantonment area. Among these are Bear, Polaris, Moose, Hidden, Pike, Rainbow, Scout, Grayling, and Tar Kettle lakes. Creeks that can be found in the vicinity of the airfield include French and Moose creeks.

3.1.4.3 Piledriver and Garrison sloughs are the two largest streams in the vicinity of the airfield. Piledriver Slough, which discharges into the Tanana River, is located along the western edge of Eielson and approximately 4,000 feet west of the airfield and parallel to the runways. Approximately 12 miles of Piledriver Slough occurs on Eielson. The slough receives no runoff from the urban developed area of the base and has good water quality.

3.1.5 Noise

Aircraft generate by far the most noise on Eielson. Noise levels associated with aircraft during flying hours can exceed 80 decibels (dB) in the vicinity of the flight line; however, the decibel level drops off to a maximum of 70-dB in the closest residential area, Moose Creek, just north of the base. A 65-dB level is not recommended for housing areas by EPA standards (Noise Effects Handbook, US EPA, 1981). Construction noise is potentially another source of noise, but it is not considered to be a concern due to its temporary nature and relatively low dB level. **Figure 3-1** is a chart that provides a scale of noise levels associated with typical daily activities.

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Figure 3-1 - Noise Levels

3.1.6 Air Quality

Air quality is generally good at Eielson. Although portions of the North Star Borough, of which Eielson is also a part, are in non-attainment for carbon monoxide (Fairbanks and North Pole), Eielson is far enough south to not be included or affected. The Clean Air Act designates areas as *attainment, non-attainment, maintenance,* or *unclassified* with respect to their compliance with National Ambient Air Quality Standards (NAAQS). Non-attainment and maintenance areas are locales that have recently violated one or more of the NAAQS and must satisfy the requirements of State or Federal Implementation Plans (SIPs or FIPs) to bring them back into conformity with the applicable air quality standards. Eielson is located in an *unclassified* area, and therefore activities that generate emissions do not need to satisfy the requirements of the State or *Federal Implementation Plans*.

3.1.7 Cultural Resources

In 1994, Eielson contracted for the preparation of a predictive model for the discovery of prehistoric cultural resources on base lands. The predictive model was then used to conduct an evaluation of cultural resources on Eielson as required by Section 110 of the National Historic Preservation Act. The areas associated with the proposed action and Alternative 1 have been determined to not contain cultural or archeological resources. In the event that during project excavation/construction any cultural resources were encountered, activities would cease until the resources were evaluated.





3.2 Biological Resources

3.2.1 Vegetation

3.2.1.1 The vegetation of the Tanana River Valley in the vicinity of Eielson is typical of boreal forest or taiga habitats. The boreal forests of Eielson are predominantly evergreen forests dominated by black spruce and white spruce (*Picea glauca*), but also include extensive stands of deciduous forests containing paper birch (*Betula papyrifera*), quaking aspen (*Populus tremuloides*), and balsam poplar (*P. balsamifera*). Extensive areas of shrub and herbaceous vegetation are found in wetlands, lowland areas, and the active floodplain, and are dominated by willows and other shrubs,

sedges, and grasses. Bog areas are dominated by black spruce stands intermixed with peat moss (*Sphagnum* spp.) and cottongrass (*Eriophorum vaginatum*).

3.2.1.2 Vegetation in the project area has already been impacted by previous development and use. Most of the project area is a combination of asphalt and concrete. Other portions of it are grassed areas that are mowed on a regular basis during the growing season. Intact wetland vegetation still exists in the areas indicated on **Figure 2-1**. These areas exhibit vegetation similar to that shown in **Figure 3-2**.

3.2.2 Aquatic/Fishery Resources

3.2.2.1 Lakes and streams on Eielson contain both native fish and fish stocked by the Alaska Department of Fish and Game. Native fish found in the Tanana River drainage include chinook salmon (*Oncorhynchus tshawytscha*), chum salmon (*O. keta*), silver salmon (*Oncorynchus kisutch*), burbot (*Lota lota*), arctic grayling (*Thymallus arcticus*), northern pike (*Esox lucius*), chub (*Semotilus* spp.), several species of whitefish (*Coregonus* spp.), sheefish (*Stenodus leucichthys nelma*), rainbow trout (*Oncorhynchus mykiss*), and arctic char (*Salvelinus alpinus*).

3.2.2.2 The Alaska Department of Fish and Game stocks five lakes and one stream on Eielson: Grayling Lake, Hidden Lake, Polaris Lake, 28 Mile Pit, Moose Lake, and Piledriver Slough. Fish stocked by the Alaska Department of Fish and Game includes rainbow trout, arctic grayling, arctic char, silver salmon, chinook salmon, chum salmon, and northern pike. There are no known federally listed threatened or endangered fish species, fish species proposed for listing, or critical fish habitats on Eielson.

3.2.3 Wildlife Resources

3.2.3.1 The surrounding Tanana Valley provides breeding habitat for a wide variety of migratory bird species. Bird species found on Eielson include spruce grouse *(Dendragapus canadensis)*, ruffed grouse *(Bonasa umbellus)*, northern goshawk *(Accipiter gentilis)*, sharp-shinned hawk *(A. striatus)*, great horned owl *(Bubo virginianus)*, red-tailed hawk *(Buteo jamaicensis)*, and American kestrel *(Falco sparverius)*. During winter, willow ptarmigan *(Lagopus lagopus)* and rock ptarmigan *(L. mutus)* are common on Eielson. Over 20 species of waterfowl, including geese, ducks, loons, grebes, and scoters use aquatic habitats on the installation.

3.2.3.2 There are 32 species of mammals found on Eielson. Common species include moose (*Alces alces*), black bear (*Ursus americanus*), grizzly bear (*U. arctos*), snowshoe hare (*Lepus americanus*), marten (*Martes americana*), red squirrel (*Tamiasciurus hudsonicus*), beaver (*Castor canadensis*), muskrat (*Ondatra zibethicus*), mink (*Mustela vison*), meadow vole (*Microtus pennsylvanicus*), red-back vole (*Clethrionomys rutilus*), and meadow jumping mice (*Zapus hudsonius*).

3.2.4 Habitat Value

This section provides a summary of the existing habitat quality and function for the areas associated with the proposed project and alternative 1.

3.2.4.1 Proposed Project

The proposed project area exhibits a wide range of habitat values. The areas that have been covered by asphalt and concrete provide no habitat function for wildlife. The grassy areas adjacent to the pavement provide some feeding and resting habitat for birds and possibly some denning habitat for voles and shrews. The wetland areas that are adjacent to E-7 and E-8 ramps are partially intact and exhibit much the same vegetation that is found in nearby black spruce scrub/shrub habitats. The only difference is that they are in small, discontinuous pockets (see **Figure 2-1**). This significantly reduces its functional value, as most species need larger areas of intact habitat to satisfy their range requirements. In addition, the disturbance factor associated with activities such as aircraft engine noise is quite high in the area.

3.2.4.2 Alternative 1

The habitat value of lands associated with alternative 1 is very low. Most of the area impacted exists as concrete and asphalt. The remaining areas are grassed and are maintained by frequent mowing during the growing season.

3.2.5 Threatened and Endangered Species

No threatened or endangered species, as designated by the US Fish and Wildlife Service, typically occur in any of the project areas included in the two action alternatives. This was the conclusion of an Eielson contract study entitled *Biological Survey, Final Report 1994*, that addressed the potential for the presence of endangered species on base lands. Recent observations continue to support this likelihood.

4.0 Environmental Consequences

This section discusses the probable impacts for each alternative described in Section 2.0. This section is organized according to resources and a discussion of each alternative action is provided relative to resources identified as relevant in Section 3.

4.1 Physical Environment

4.1.1 Geology and Soils

4.1.1.1 *Proposed Action*: The proposed action would require that an additional 30 acres of concrete and asphalt be constructed in areas where there is presently none. This would require the excavation of soils to a depth of 2 to 4 feet and backfilling with gravel base course brought in from Mullins Pit. This would alter, to some extent, the natural soil profiles in the area. Some of the soils have already been disturbed and do not exhibit profiles like those in adjacent undisturbed areas. Some areas, particularly wetlands, would have their soil profiles greatly altered as all frost susceptible soil types will be removed and replaced with alluvial gravels.

4.1.1.2 *Alternative 1:* Soils in the vicinity of alternative 1 have already been disturbed as a result of previous construction activities and do not exhibit characteristics of unaltered or natural soil profiles. Additional construction would result in impacts similar to those that have already occurred in the area from previous construction.

2.1.1.3 No Action Alternative: No impacts to soils would result from this alternative.

4.1.2 Groundwater

It is unlikely that impacts to groundwater would result from either the proposed action or alternative 1. The only remote possibility would be as a result of fuel spills by construction equipment during the construction phase. All contractors are required to have spill response capability on-site at all times during construction. In the event that a contractor was unable to adequately respond to a spill, an Eielson spill response team would be on call.

4.1.3 Surface Water

4.1.3.1 *Proposed Action:* The closest surface water is Garrison Slough, which is within 300 feet of the project area. Garrison Slough is a small stream whose headwaters originate in nearby wetlands. The slough runs through the industrial portion of the base and in some portions has been channelized, but in general exhibits good water quality. Although the stream would be in relatively close proximity to construction that would occur with the proposed action, all measures would be taken to prevent any impacts to the stream. These would include minimum setbacks for all activities by construction equipment and the placement of silt fences to assure that no siltation from surface runoff would occur.

4.1.3.2 *Alternative 1 and the No Action Alternative:* No impacts to surface waters would occur from these alternatives.

4.1.4 Noise

4.1.4.1 *Proposed Action*: Noise impacts associated with implementation of this action would be short-term and relatively low decibel compared to ambient noise levels that routinely occur with flight line aircraft operations. Noise would be associated with operation of construction machinery and would last only for the duration of the construction of the ramp.

4.1.4.2 *Alternative 1:* Noise related impacts from this alternative would be similar to those described for the proposed action.

4.1.4.3 No Action Alternative: No impacts from noise would result from this alternative.

4.1.5 Air Quality

4.1.5.1 *Proposed Action:* Some minor, short-term impacts from emissions associated with the operation of construction machinery would result from the proposed action.

4.1.5.2 *Alternative 1:* Impacts to air quality could result from the operation of construction machinery with this alternative.

4.1.5.3 *No Action Alternative*: No impacts to air quality would result from this alternative.

4.1.6 Cultural Resources

No impacts to cultural resources would result from any identified alternatives.

4.2 Biological Resources

4.2.1 Vegetation

4.2.1.1 *Proposed Action:* Impacts to vegetation would occur as a result of construction of the proposed action. Wetland vegetation would be removed by a hydro-axe and filled with gravel during project construction.

4.2.1.2 Alternative 1: Little if any vegetation would be impacted by this alternative.

4.2.1.3 *No Action Alternative:* No impacts to vegetation would result from this alternative.

4.2.2 Aquatic/Fishery Resources

4.2.2.1 *Proposed Action*: Since there are no surface water resources in the project area, no direct impacts to aquatic or fishery resources would occur from project related activities. There is a remote chance that indirect impacts to Garrison Slough could occur in the event silt from the project site would be flushed by surface runoff into the stream. Since the distance from the project to Garrison Slough is approximately 300 feet or more, this is unlikely. In addition, silt fences will be constructed to prevent this from occurring.

4.2.2.2 *Alternative 1:* No impacts to aquatic/fishery resources would occur from this alternative.

4.2.2.3 *No Action Alternative:* No impacts to aquatic/fishery resources would occur from this alternative.

4.2.3 Wildlife Resources

4.2.3.1 *Proposed Action*: Minor impacts to small mammals and birds could occur from the filling of 6.5 acres of black spruce wetlands. Most wildlife would likely be displaced to adjoining habitat, particularly to the south where large areas of intact wetlands are in close proximity to the proposed project area.

4.2.3.2 *Alternative 1:* There would be little, if any, impacts to wildlife as the result of alternative 1.

4.2.3.3 No Action Alternative: No impacts to wildlife would result from this alternative.

4.2.4 Threatened and Endangered Species

There are no threatened or endangered species on Eielson lands and no impacts to these species would result from any of the alternatives considered in this EA.

4.3 Cumulative Impacts

The National Environmental Policy Act (NEPA) process requires that the issue of cumulative impacts be addressed in an environmental assessment.

4.3.1 The Council on Environmental Quality (CEQ) has stated in their NEPA regulations (1508.7) that: "Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to past, present, and reasonably foreseeable future actions..." and "...can result from individually minor, but collectively significant actions taking place over a period of time." Eielson has, over the years, been very cognizant of the issue of cumulative impacts to wetlands. This is due to the fact that the base was, to a large extent, built by filling wetlands, and that expansion of Eielson facilities beyond the original footprint of the base often requires the

use of additional wetlands. Of the 19,789 acres that constitute Eielson lands, 51 percent are designated wetlands. Of the remaining undeveloped base lands, more than 70 percent are designated wetlands.

4.3.2 To address the potential for cumulative impacts to wetlands, Eielson has developed an active program of wetland habitat creation and enhancement. Classification of Eielson wetlands according to type and quality (as defined in Cowardin, et al, US Fish and Wildlife Service, 1979) has indicated that 93 percent of Eielson wetlands are of low quality. Most of these wetlands are classified as black spruce or willow/alder, scrub/shrub wetlands and constitute large, homogenous blocks of land that provide minimal wetland values to wildlife. When Eielson develops a gravel source by excavating alluvial gravel deposits, it is often in these black spruce wetlands. As part of the extraction process, wetlands of higher value are created (lake habitat with shallow littoral zones and emergent vegetation) from lower value black spruce and uplands. The type and quality of wetlands are particularly valuable for feeding, nesting, and brood-rearing by waterfowl, the bird species potentially most affected by the proposed project. The wetland creation/enhancement program on Eielson has been going on for several years and has the full and enthusiastic support of local, state, and federal resource agencies. In addition, resource agencies have viewed this voluntary wetlands enhancement program as more than adequate to compensate for losses that occur as part of Eielson construction projects.

4.3.3 The currently proposed project would result in the loss of 6.5 acres of black spruce scrub/shrub wetlands. These wetlands are located in close proximity to existing facilities that, due to the nature of associated routine aircraft activity, have reduced somewhat the value of the wetlands. In addition, roads fragment the wetlands, which further reduces their functional value. Last of all, there are large tracts of similar habitat to the south of the project area to which most wildlife currently using the project area would likely be displaced. Taking into account all of this factors it is not likely that the proposed project would result in significant cumulative impacts to resources on Eielson.

4.4 Unavoidable Adverse Impacts

4.4.1 Proposed Action: The Proposed Action would result in the permanent loss of 6.5 acres of low value black spruce and willow/alder scrub/shrub wetlands.

4.4.2 Alternative 1: This alternative would not result in any unavoidable adverse impacts.

4.4.3 No Action Alternative: This alternative would not result in any unavoidable adverse impacts.

4.5 Relationship of Short-Term Uses and Long-Term Productivity

The Proposed Action would result in some minor long-term losses. The loss of 6.5 acres of wetlands would be permanent, and the productivity, although quite minimal,

would be lost for the foreseeable future. The short-term uses would be the expansion of the E-7 and E-8 parking ramps.

4.6 Irreversible and Irretrievable Commitments of Resources

The Proposed Action is the only action considered in this EA that would result in additional irreversible and irretrievable commitments of resources. The resources lost would include 6.5 acres of black spruce and willow/alder wetlands.

4.7 Environmental Justice

4.7.1 President Clinton issued Executive Order (EO) 12898, *Environmental Justice in Minority Populations and Low-Income Populations*, on February 11, 1994. Objectives of the EO, as it pertains to the NEPA process, requires federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and lowincome populations. To accomplish these requirements the Air Force must conduct an environmental justice analysis of all potential impacts that may result from the proposed actions.

4.7.2 The environmental justice analysis must first identify all adverse impacts associated with the project. The next phase is to delineate the potential area of impact for the resources affected. If, within this area of impact, population demographics are such that a disproportionate effect on minority or low-income populations may occur, it should be so identified. These impacts should be documented and mitigation should be developed that can be implemented by the Air Force.

4.7.3 The site for the proposed action is in the industrial portion of the base and does not exhibit any particular demographics. This project would have equally beneficial effects on a full cross-section of the demographics of Eielson's base population. Based on the environmental impacts identified in this EA and on a corresponding environmental justice analysis, it is felt that no disproportionate impact to minority or low-income populations would occur from implementation of this project.

4.8 Mitigation

No mitigation is proposed or required as a result of federal and state permits obtained for this project.

5.0 List of Persons and Agencies Consulted

Mr. Brent Koenen, USAF, 354 CES/CEVN, Eielson AFB, AK, ph: 377-5182.

Ms. Sheila Newman, US Army Corps of Engineers, Regulatory Functions Branch, Fairbanks, AK, ph: 474-2166.

Mr. Jeff Putnam, USAF, 354 CES/CECC, Eielson AFB, AK, ph: 377-1162.

Mr. Larry Bright, US Fish and Wildlife Service, Fairbanks, AK, ph: 456-0322.

6.0 Glossary

Alluvial - Sediment deposited by flowing water.

<u>Carbon Monoxide</u> - A colorless, odorless gas resulting from the incomplete oxidation of carbon; found, for example, in automobile exhaust or mining operations; poisonous to animals.

<u>Cantonment</u> - The main operational area of a military base.

Culvert - A drain crossing under a road or an embankment.

Environmental Impact Analysis Process (EIAP) - is a set of guidelines (Air Force Instruction 32-7061) that the Air Force uses to comply with the NEPA process.

Decibel - A unit of measurement for describing sound intensity.

<u>Executive Order 11990</u> - Mandate to federal agencies to follow the NEPA process to ensure the protection of wetlands.

<u>Habitat</u> - The area or environment in which an organism or ecological community normally occurs.

<u>Hydro-axed</u> - A large axing machine driven by hydraulics that cuts down and mulches shrubs and trees.

Installation Restoration Program (IRP) - An Air Force program mandated to identify, investigate, and clean up contamination associated with past Air Force activities.

<u>Mean Sea Level (MSL)</u> - The average surface level for all stages of the tide over a 19year period, usually determined from hourly height readings from a fixed reference point.

National Environmental Policy Act (NEPA) - Legislation enacted in 1969 mandating that all federal agencies assess the environmental impacts of actions which may have an impact on man's environment.

<u>National Historic Preservation Act</u> - Federal mandate that requires the preservation of prehistoric and historic sites.

<u>Non-Attainment Area</u> - An area exceeding National Ambient Air Quality Standards for one or more criteria pollutants.

Permafrost - Permanently frozen subsoil occurring in perennially frigid areas.

<u>Riparian</u> - Living or located on a riverbank or a natural course of water.

SAFO 780-1 - Secretary of the Air Force Order and reference number.

<u>Seasonally Persistent</u> - Persistence is based on historical records and field evidence that indicates an area is seasonally inundated with water during non-frozen (spring/summer) portions of the year.

<u>Turbidity</u> - Cloudy or hazy appearance in a naturally clear liquid caused by a suspension of colloidal liquid droplets or fine solids.

<u>Understory</u> - A foliage layer occurring beneath and shaded by the main canopy of a forest.

<u>Upland</u> - An area of land of higher elevation, often used as the opposite of a wetland.

<u>Wetlands</u> - Those 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.

<u>404 Wetland</u> - Wetland areas that have been determined "waters of the United States" and thus subject to Section 404 wetland permitting guidelines administered by the Army Corps of Engineers and the Environmental Protection Agency.

<u>Wetland Functional Value</u> - A methodology that identifies the type, quantity, and quality of an ecosystem, and uses or potential uses of wetlands in the vicinity of a proposed project.

<u>100-Year Floodplain</u> - Based on historical evidence, there is a high probability that the area within the 100-year floodplain will be flooded once every 100 years.

7.0 Project Wetlands Permit



DEPARTMENT OF THE ARMY U.S. ARMY ENGINEER DISTRICT, ALASKA 3437 AIRPORT WAY SUITE 206 WASHINGTON PLAZA FAIRBANKS, ALASKA 99709-4777

December 4, 2003

Regulatory Branch North Section 4-2003-1246

Lt. Col. Alan J. Wieder 2310 Central Avenue, Suite 100 Eielson AFB, Alaska 99702

Dear Lt. Col. Wieder

· Enclosed is the signed Department of the Army permit, file number 4-2003-1246, authorizing the placement of fill material into approximately 6.5 acres of wetlands to expand the taxiway and parking apron on Eielson Air Force Base, Alaska. Also enclosed is a Notice of Authorization which should be posted in a prominent location near the authorized work.

If changes in the plans or location of the work are necessary for any reason, plans should be submitted to this office promptly. Federal law requires approval before construction is begun; if the changes are unobjectionable, approval will be issued without delay.

Nothing in this letter shall be construed as excusing you from compliance with other Federal, State, or local statutes, ordinances, or regulations which may affect the proposed work.

Please take a moment to complete and return the enclosed questionnaire. Our interest is to see how we can continue to improve our service to you, our customer, and how best to achieve these improvements. Upon your request, you may also provide additional comments by telephone or a meeting. We appreciate your efforts and interest in evaluating the regulatory program.

Please contact me at (907) 474-2166, or by mail at the address above, ATTN: CEPOA-CO-R-N, if you have questions. For additional information about our Regulatory Program, visit our web site at www.poa.usace.army.mil/reg.

Singerely, M. Newman tory Project Manager

Enclosures

DEPARTMENT OF THE ARMY PERMIT

Permittee United States Air Force, Eielson Air Force Base

Permit No. 4-2003-1246, Garrison Slough 8

Issuing Office U.S. Army Engineer District, Alaska

NOTE: The term "you" and its derivatives, as used in this permit, means the permittee or any future transferee. The term "this office" refers to the appropriate district or division office of the Corps of Engineers having jurisdiction over the permitted activity or the appropriate official of that office acting under the authority of the commanding officer.

You are authorized to perform work in accordance with the terms and conditions specified below.

Project Description: Discharge approximately 46,474 cubic yards of gravel, 1208 cubic yards of asphalt; and 766 cubic yards of concrete into approximately 6.5 acres of wetlands to expand the taxiway and parking apron and replace frost susceptible soil with construction grade gravel to provide a stable base for asphalt and concrete application.

All work will be performed in accordance with the attached plan, sheets (1-4), dated August 5, 2003.

Project Localion: Section 24, Township 3 South, Range 3 East, Fairbanks Meridian, on Eielson Air Force Base, Alaska. N 64° 38 11, 147° 03 08.

Permit Conditions:

General Conditions:

1. The time limit for completing the work authorized ends on <u>November 30</u>, 2006. If you find that you need more time to complete the authorized activity, submit your request for a time extension to this office for consideration at least one month before the above date is reached.

2. You must maintain the activity authorized by this permit in conformance with the terms and conditions of this permit. You are not relieved of this requirement if you abandon the permitted activity, although you may make a good faith transfer to a third party in compliance with General Condition 4 below. Should you wish to cease to maintain the authorized activity or should you desire to abandon it without a good faith transfer, you must obtain a modification of this permit from this office, which may require restoration of the area.

3. If you discover any previously unknown historic or archeological remains while accomplishing the activity authorized by this permit, you must immediately notify this office of what you have found. We will initiate the Federal and state coordination required to determine if the remains warrant a recovery effort or if the site is eligible for listing in the National Register of Historic Places.

ENG FORM 1721, Nov 86

EDITION OF SEP 82 IS OBSOLETE

(33 CFR 325 (Appendix A))

4. If you sell the property associated with this permit, you must obtain the signature of the new owner in the space provided and forward a copy of the permit to this office to validate the transfer of this authorization.

5. If a conditioned water quality certification has been issued for your project, you must comply with the conditions specified in the certification as special conditions to this permit. For your convenience, a copy of the certification is attached if it contains such conditions.

6. You must allow representatives from this office to inspect the authorized activity at any time deemed necessary to ensure that it is being or has been accomplished in accordance with the terms and conditions of your permit.

Special Conditions:

 All disturbed and fill areas shall be stabilized to prevent erosion. Increased water turbidity and accumulation of sediment in drainages, sloughs, and other wetlands shall be evidence of insufficient stabilization.
 No fill or construction materials shall be stockpiled on adjacent wetlands outside the project boundary.

3. Natural drainage patterns shall be maintained to the extent practicable by the installation of culverts in sufficient number and size under access roads to prevent ponding, diversion, or concentrated runoff that would result in adverse impacts to adjacent wetlands and other fish and wildlife habitats. 4. The milled asphalt shall not be placed in the wetlands at an elevation equal or below the top of the existing wetland elevation and if placed there shall be capped with an impervious layer.

5. Prior to fill placement, a silt fence or similar structure shall be installed on a line parallel to and within 5' of the proposed fill toe of slope within all wetland areas that contain standing water that is connected to any natural body of water or where the fill toe is within 25; of such a water body. This structure shall remain in place until the fill has been stabilized or contained in another manner. Silt fences will not have to be installed if the construction activity is occurring during the time that the water is in a frozen state.

6. Fill placed during winter construction within wetlands that during the summer contain surface water that is connected to natural bodies of water, must be stabilized or contained in the spring prior to breakup, to insure that silts are not carried from the fill to the natural bodies of water in the summer.

Special Information:

Any condition incorporated by reference into this permit by General Condition 5, remains a condition of this permit unless expressly modified or deleted, in writing, by the District Engineer or his authorized representative.

Further Information:

 Congressional Authorities: You have been authorized to undertake the activity described above pursuant to: Section 404 of the Clean Water Act (33 U.S.C. 1344).

2. Limits of this authorization.

a. This permit does not obviate the need to obtain other Federal, state, or local authorization required by law.

b. This permit does not grant any property rights or exclusive privileges.

c. This permit does not authorize any injury to the property or rights of others.

d. This permit does not authorize interference with any existing or proposed Federal project.

3. Limits of Federal Liability. In issuing this permit, the Federal Government does not assume any liability for the following:

a. Damages to the permitted project or uses thereof as a result of other permitted or unpermitted activities or from natural causes.
 b. Damages to the permitted project or uses thereof as a result of current or future activities undertaken by or on behalf of the United States in the public interest.

c. Damages to persons, property, or to other permitted or unpermitted activities or structures caused by the activity authorized by this permit.

d. Design or construction deficiencies associated with the permitted work.

(REVERSE OF ENG FORM 1721)

e. Damage claims associated with any future modification, suspension, or revocation of this permit.

Reliance on Applicant's Data: The determination of this office that issuance of this permit is not contrary to the public interest was
made in reliance on the information you provided.

5. Reevaluation of Permit Decision. This office may reevaluate its decision on this permit at any time the circumstances warrant. Circumstances that could require a revaluation include, but are not limited to, the following:

a. You fail to comply with the terms and conditions of this permit.

b: The information provided by you in support of your permit application proves to have been false, incomplete, or inaccurate (See 4 above).

c. Significant new information surfaces which this office did not consider in reaching the original public interest decision.

Such a reevaluation may result in a determination that it is appropriate to use the suspension, modification, and revocation procedures contained in 33 CFR 325.7 or enforcement procedures such as those contained in 33 CFR 326.4 and 326.5. The referenced enforcement procedures provide for the Issuance of an administrative order requiring you to comply with the terms and conditions of your permit and for the initiation of legal action where appropriate. You will be required to pay for any corrective measures ordered by this office, and if you fail to comply with such directive, this office may in certain situations (such as those specified in 33 CFR 209.170) accomplish the corrective measures by contract or otherwise and bill you for the cost.

6. Extensions. General condition 1 establishes a time limit for the completion of the activity authorized by this permit. Unless there are circumstances requiring either a prompt completion of the authorized activity or a reevaluation of the public interest decision, the Corps will normally give favorable consideration to a request for an extension of this time limit.

Your signature below, as permittee, indicates that you accept and agree to comply with the terms and conditions of this permit.

u lodel (PERMIT

25 NON 03

This permit becomes effective when the Federal/Official, designated to act for the Secretary of the Army, has signed below.

4 Dec 03 FOR (DISTRICT ENGINEER)

Colonel Timothy J. Gallagher Sheila Newman, Regulatory Project Manager North Section, Regulatory Branch

When the structures or work authorized by this permit are still in existence at the time the property is transferred, the terms and conditions of this permit will continue to be binding on the new owner(s) of the property. To validate the transfer of this permit and the associated liabilities associated with compliance with its terms and conditions, have the transferee sign and date below.

(TRANSFEREE)

(DATE)

3

8.0 Public Notice

USAF ANNOUNCES an ENVIRONMENTAL ASSESSMENT

In accordance with the National Environmental Policy Act (NEPA), and Air Force Regulations, Eielson Air Force Base has completed an environmental assessment (EA) and Finding of No Significant Impact (FONSI) to evaluate the consequences of the following stated proposed action:

Expand existing parking ramps E-7 and E-8 on the South Loop to increase the number of aircraft parking spaces from six to sixteen. Approximately 1,170,766 square feet of new pavement will be constructed. The proposed project would result in impacts to 6.5 acres of black spruce and scrub/shrub willow/alder wetlands.

PUBLIC COMMENT WELCOME

To review the draft EA and FONSI, copies are available at the Noel Wien Library in Fairbanks. The public is invited to review these documents and make comments during the 30-day comment period from now until January 10, 2004. To get a copy of the EA, to comment, or for more information contact Maj. Valerie Trefts, 354 FW/Public Affairs, at (907) 377-2116, 3112 Broadway Ave., Unit 15A, Eielson AFB, AK 99702-1830.

2



DEPARTMENT OF THE AIR FORCE PACIFIC AIR FORCES

22 Dec 03

MEMORANDUM FOR 354 FW/CV

FROM: 354 FW/JA

SUBJECT: Environmental Assessment, Expansion of Aircraft Parking Ramps E-7 and E-8

1. I have reviewed Environmental Assessment (EA), Finding of No Significant Impact and Finding of no Practical Alternative for the proposed expansion of aircraft parking ramps E-7 and E-8 at Eielson AFB, AK, to ensure compliance with 32 C.F.R. Part 989, as incorporated by reference in AFI 32-7061, *The Environmental Impact Analysis Process*. I find the assessment to be legally sufficient.

2. Should you have any questions, please feel free to contact me at 377-4114.

Mann C Barret

MELISSA L. BARSOTTI, Maj, USAF Deputy Staff Judge Advocate

I concur.

Hund my There

KENNETH M. THEURER, Lt Col, USAF Staff Judge Advocate