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# **DEADHORSE AIRPORT IMPROVEMENTS**

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**FINDING OF NO SIGNIFICANT IMPACT**

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**AUGUST 2023**

## FINDING OF NO SIGNIFICANT IMPACT

The National Environmental Policy Act of 1969 (NEPA) (42 United States Code §4321 et seq.) requires federal agencies to consider the potential environmental impacts prior to undertaking a course of action. Within the Federal Aviation Administration (FAA), NEPA is implemented through regulations promulgated by the Council on Environmental Quality (CEQ; 40 Code of Federal Regulations (CFR) §§1500–1508) with supplemental requirements provided under FAA Order 1050.1F and FAA Order 5050.4, with additional guidance for environmental impact analysis provided in Order 1050.1F Version 2 Desk Reference.

In addition to FAA Order 1050.1F, other NEPA-implementing policies and procedures may be applicable to a proposed action, including FAA Order 5050.4B, NEPA Implementing Instructions for Airport Actions (FAA 2006). Other major federal and state statutes, EOs and regulatory measures applying to the proposed action include:

- Alaska Statutes Title 16. Fish and Game
- Alaska Historic Preservation Act. (AHPA) AS 41.35
- Alaska Administrative Code 11 AAC 93.035
- Alaska Administrative Code 11 AAC 93.220
- Alaska Administrative Code 18 AAC 62.020
- Alaska Administrative Code 18 AAC 62.500 – 62.511
- Alaska Administrative Code 18 AAC 75.300
- Alaska Department of Environmental Conservation, 4 April 2019, Technical Memorandum – Establishing Arctic Zone Cleanup Levels
- Archaeological Resources Protection Act of 1979 (16 U.S.C. §§ 470aa–470mm)
- Bald and Golden Eagle Protection Act (16 U.S.C. §§ 668–668c)
- CEQ (Council on Environmental Quality) National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change. 88 FR 1196. Interim Guidance. January 2023.
- Clean Air Act (CAA) (42 U.S.C. §§ 7401–7671q); 40 CFR parts 85, 86, and 600 for surface vehicles; and 40 CFR part 80 regarding the Alternative Low-Sulfur Diesel Fuel Transition Program for Alaska
- Clean Water Act (CWA) 33 U.S.C. §§ 1251-1387 and implementing regulations in 33 CFR parts 320-332 and 40 CFR parts 230-233
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 as amended by the Superfund Amendments Re-authorization Act of 1986 and the Community Environmental Response Facilitation Act of 1992 42 U.S.C. §§ 9601-9675 · Emergency Planning and Community Right to Know Act 42 U.S.C. §§ 11001-11050
- Endangered Species Act (16 U.S.C. §§ 1531–1544)
- EO 11514 as amended by EO 11991. Protection and Enhancement of Environmental Quality
- EO 11593. Protection and Enhancement of the Cultural Environment
- EO 11988. Floodplain Protection

- EO 11990. Protection of Wetlands
- EO 12088. Federal Compliance with Pollution Control Standards
- EO 12580. Superfund Implementation as amended by EO 13016, as further amended by EO 13308; 52 FR 2923; 61 FR 45871; 68 FR 37691
- EO 12898. Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- EO 13045. Protection of Children from Environmental Health Risks and Safety Risks
- EO 13112. Invasive Species
- EO 13175. Consultation and Coordination with Indian Tribal Governments
- EO 13514. Federal Leadership in Environmental Energy and Economic Performance
- EO 13653. Preparing the United States for the Impacts of Climate Change
- EO 13693. Planning for Federal Sustainability 80 FR 15869
- EO 13751. Safeguarding the Nation from the Impacts of Invasive Species
- EO 13834. Efficient Federal Operations
- EO 13990. Protecting Public Health and the Environment and Restoring Science to Tackle the Climate
- EO 14008. Tackling the Climate Crisis
- EO 14096. Revitalizing our Nation’s Commitment to Environmental Justice for All
- Fish and Wildlife Coordination Act 16 U.S.C. § 661-667d
- Hazardous Materials Transportation Act 49 U.S.C. §§ 5101-5128
- Marine Mammal Protection Act of 1972, 16 U.S.C. Ch. 31 §§ 1361–1362, 1371-1389, 1401- 1407, 1411-1418, 1421-1421h, 1423-1423h
- Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712)
- National Flood Insurance Act 42 U.S.C. § 4001 et seq.
- National Historic Preservation Act of 1966 (54 U.S.C. § 300101)
- North Slope Borough Municipal Code. Titles 12 and 19
- Pollution Prevention Act of 1990 (42 U.S.C. §§ 13101–13109)
- Resource Conservation and Recovery Act 42 U.S.C. §§ 6901-6992k
- Toxic Substances Control Act (TSCA; 15 U.S.C. §§ 2601–2697)
- U.S. Department of Transportation Act – Section 4(f) 49 U.S.C. § 303
- Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA– LU) – Section 6009 49 U.S.C. § 303

In adherence with the NEPA, 40 CFR §§1500–1508, and the applicable FAA orders and guidance, the Alaska Department of Transportation and Public Facilities (DOT&PF) prepared an environmental assessment (EA) on behalf of the FAA to assess the potential environmental impacts from the Deadhorse Airport Improvement Project at Deadhorse Airport (SCC), Deadhorse, Alaska. The proposed action and its environmental impact analysis were developed in compliance with these environmental requirements, including interagency and intergovernmental coordination and consultation, public involvement, and documentation requirements. The proposed action is consistent with community planning as it supports the safe operation of the airport.

## ***Description of Proposed Action***

The proposed action purpose is to correct Deadhorse Airport deficiencies, address safety concerns, improve drainage, and help bring the airport into compliance with FAA design standards (Part 139 Safety Enhancement) and criteria identified in the Alaska Statewide Transportation Plan (ASTP) and Alaska Aviation System Plan (AASP). Most of the Deadhorse Airport southern airside perimeter lacks fencing. Part 139 inspections have identified that a full perimeter fence is needed to manage wildlife hazards at the airport. A lack of a perimeter fence also does not satisfy the FAA Order 7050.1B (FAA 2021) initiative to reduce unauthorized access to the air operations area or meet Transportation Safety Administration (TSA) security standards. TSA requires airport operator compliance with the TSA Airport Security Program to provide for safety and security of persons and property on aircraft operating in air transportation or intrastate air transportation against an act of criminal violence, aircraft piracy, and the introduction of an unauthorized weapon, explosive, or incendiary onto an aircraft (49 CFR 1542).

The proposed action would construct a full perimeter fence with gates at various locations, and a single, all-season, fence maintenance access road around the Deadhorse Airport perimeter. Infield ponds and areas between the runway and parallel taxiway, and between the taxiway and ramp area, would be filled and graded. Failing drainage culverts would be replaced, new culverts would be placed as necessary, and existing drainage ditches would be rehabilitated on airport property at infield locations and along Deadhorse Way. Pavement or surfacing would be replaced, and utilities would be moved as necessary for culvert and drainage work. A new material source access road would be constructed from a southern extent of the new airport perimeter fence embankment to the Dalton Highway at approximately milepost (MP) 411.5.

## ***Alternatives Considered***

### **Alternative 1**

Alternative 1 (the Preferred Alternative) meets the purpose and need of the proposed action by correcting Part 139 safety issues by constructing a wildlife fence to prevent caribou and other mammal incursions into airport operational surfaces; decreasing risk of bird strikes by grading and filling infield areas to eliminate waterfowl nesting habitats; and resolving drainage deficiencies by implementing drainage improvement work at infield locations and along Deadhorse Way. The Preferred Alternative action would include work to:

1. Replace and/or install new culverts on airport property at infield locations and along Deadhorse Way, replace existing airport and highway pavements and taxiway lighting as necessary for completing drainage improvements, rehabilitate select existing drainage ditches along Deadhorse Way embankments, relocate known utilities affected by completion of drainage improvements, and regrade and/or place fill in select infield locations to aid in drainage and wildlife hazard control.
2. Construct an approximately 20,000-foot-long airport perimeter wildlife fence and associated gates for access control, an associated fence maintenance service road, and

fence security features to exclude large mammals from accessing operational surfaces. The proposed road and fence routing would exclude the existing Very High Frequency Omnidirectional Radio Range (VOR) building east of the runway.

3. Construct a permanent material source access road between the southern portion of the new fence maintenance service road and a point on the Dalton Highway near the southeastern extent of airport property.

## **Alternative 2**

Alternative 2 also meets the purpose and need of the proposed action by correcting Part 139 safety issues by constructing a wildlife fence to prevent caribou and other mammal incursions into airport operational surfaces; decreasing risk of bird strikes by grading and filling infield areas to eliminate waterfowl nesting habitats; and resolving drainage deficiencies by implementing drainage improvement work at infield locations and along Deadhorse Way. Alternative 2 action would include work to:

1. Replace and/or install new culverts on airport property at infield locations and along Deadhorse Way, replace existing airport and highway pavements and taxiway lighting as necessary for completing drainage improvements, rehabilitate select existing drainage ditches along Deadhorse Way embankments; relocate known utilities affected by completion of drainage improvements; regrade and/or place fill in select infield locations to aid in drainage and wildlife hazard control.
2. Construct an approximately 23,500-foot-long airport perimeter wildlife fence and associated gates for access control, an associated fence maintenance service road, and fence security features to exclude large mammals from accessing operational surfaces. To minimize construction on unstable soils, avoid potential operations to airport navigational aids, and reduce the amount of required new fence embankment construction, the proposed road and fence routing would include the existing VOR building east of the runway within its perimeter and incorporate portions of both the existing VOR/Runway access road embankment and existing Dalton Highway embankment for fence construction. This routing would additionally provide for another means of access to the Dalton Highway nearby the VOR.
3. Construct a permanent material source access road between the southern portion of the new fence maintenance service road and a point on the Dalton Highway near the southeastern extent of the airport property.

## **No Action Alternative**

NEPA requires agencies to consider a “No Action Alternative” in their NEPA analyses and compare the effects of the No Action Alternative with the effects of the proposed action. The No Action Alternative would construct no improvements at Deadhorse Airport. The airport would neither be compliant with current FAA design standards (AC 150-5300-13B) and criteria identified in the ASTP and AASP, FAA Order 7050.1B; nor would it meet TSA security

standards per 49 CFR 1542. Existing drainage and wildlife hazard deficiencies would remain present at the airport as this alternative would not construct perimeter fencing or a fence service access road; would not improve drainage by replacing/installing culverts and replacing airport pavements or lighting, or relocating utilities as necessary for drainage improvements; would not grade or fill infield areas to improve infield drainage; and would not construct a permanent material site access road between a fence service access road and the Dalton Highway. Safety and efficiency of airport operations and security, wildlife control, airport drainage, and access to a potential material site would not be improved. The potential risks of wildlife access, and caribou and other mammal incursions onto operational surfaces, insufficient airport drainage causing damage to the airfield and Deadhorse Way embankments, aircraft damage from striking animals, and people being injured from accidents would not be reduced.

### ***Preferred Alternative***

Alternative 1 was chosen as the Preferred Alternative based on the following:

- a) The proposed action purpose and need would be met by Action Alternative 1.
- b) While Alternative 2 would require less placement of fill in wetlands resulting in fewer wetland acre impacts and loss, during the scoping period, DOT&PF Dalton Highway maintenance staff indicated that incorporating airport perimeter fencing into the existing Dalton Highway embankment would cause substantial snow drifting across that section of the highway, and result in recurring, hazardous road conditions for the public and requiring more frequent and costly highway maintenance operations.
- c) Action Alternative 2 would require approximately 15 percent more fencing material, and funding to construct, service and maintain, in the long term, than Alternative 1.

For the reasons detailed above, action Alternative 2 is not a reasonably practicable alternative that meets the proposed action purpose and need as safely and efficiently as Alternative 1. Consequently, Alternative 2 was dismissed from further consideration.

### ***Discussion of Anticipated Environmental Impacts***

The proposed action, Alternative 1, would affect no significant adverse impacts to any resource category. A summary of environmental effects relevant to the proposed action and No Action Alternatives are outlined in Table FNSI-1. Non-issue resource categories considered are summarized in Table FNSI-2.

**Table FNSI-1. Summary of Environmental and Human Resource impact Categories and Potential Impacts Identified for Further Analysis**

Environmental & Human Resource Impact Category	Proposed Action	No Action
<b>Environmental Impacts<sup>[1]</sup></b>		
Biological resources	<ul style="list-style-type: none"> <li>• Potential taking of federally listed terrestrial or marine Threatened or Endangered wildlife, fish or plant species or their critical habitats.</li> <li>• Adverse impacts to migratory birds and habitats as regulated by the Migratory Bird Treaty Act (MBTA).</li> <li>• Adverse impacts to Essential Fish Habitat (EFH).</li> <li>• Adverse impacts to state-regulated wildlife, fish, and plant species.</li> <li>• Importation or spread of invasive exotic species to project area.</li> </ul>	Wildlife (mammals & birds) would continue to access and/or be provided with potential suitable habitat on Deadhorse Airport operational surfaces. These species would remain a strike threat to aircraft and require ongoing hazing/removal by airport maintenance personnel. In addition to federally listed polar bears, various species of federally regulated migratory birds and other state-regulated species used for subsistence by regional Alaska Native and other user groups would remain adversely affected.
Hazardous materials, solid waste, and pollution prevention	<ul style="list-style-type: none"> <li>• Generation of hazardous materials</li> <li>• Generation of solid wastes</li> <li>• Liberation or release of existing hazardous material at project site.</li> <li>• Off-site migration of hazardous materials.</li> </ul>	Existing hazardous materials and substances which would be potentially excavated, removed from the project site, and transported to appropriate remedial or disposal sites would remain intact at Deadhorse Airport.
Historical, architectural, archaeological, and cultural resources	<ul style="list-style-type: none"> <li>• Potential adverse impacts to identified historical, architectural, archaeological, or cultural resources.</li> <li>• Inadvertent discovery of undocumented historical, architectural, archaeological, or cultural resources.</li> </ul>	None
US Department of Transportation Section 4(f) Resources	<ul style="list-style-type: none"> <li>• Potential use of or adverse impacts to Section 4(f) resources for transportation purposes.</li> </ul>	None

<b>Environmental &amp; Human Resource Impact Category</b>	<b>Proposed Action</b>	<b>No Action</b>
Water Resources (partial) Wetlands Floodplains	<ul style="list-style-type: none"> <li>• Construction of the proposed action would result in a loss of 78.6 acres of wetlands, waters of the U.S.; and their associated wildlife habitat values.</li> <li>• Project impacts to area surface water quality.</li> <li>• Project encroachment of the Sagavanirktok River floodplain could potentially cause increased flooding of area transportation and/or Prudhoe Bay oilfield support infrastructure as well as alter existing wildlife habitat suites.</li> </ul>	<ul style="list-style-type: none"> <li>• Existing drainage deficiencies at Deadhorse Airport would continue to affect hydrologic connectivity between wetlands within the airport and along Deadhorse Way to off-site receiving waters, affecting wetland hydrologic function and values.</li> <li>• Potential concentration of on-airport soil and water contaminants to exceedances of regulatory thresholds in airport wetlands within areas of failed drainage.</li> </ul>
Climate	<ul style="list-style-type: none"> <li>• Potential construction and operational Green House Gas (GHG) emissions modeled as potentially contributing to global climate change.</li> </ul>	Occasional extended air and ground operations of arriving and departing aircraft when potential strike hazard animals are present on operational surfaces would add result in additional fuel burn and resulting increase emission of GHG.

Note: 1. Only includes resource categories with potential adverse impacts and does not include non-applicable/non-Issue environmental impact categories



**Table FNSI-2. Non-Issue Resource Categories Considered**

<b>Environmental &amp; Human Resource Impact Categories</b>	<b>Evaluation</b>
Air Quality	<ul style="list-style-type: none"> <li>• The Alaska Department of Environmental Conservation (ADEC) Air Non-Point Mobile Source website (ADEC 2022a) indicated the proposed action is not in an air quality maintenance or non-attainment area for National Ambient Air Quality Standards.</li> <li>• No air quality analysis is needed because forecasted operations are less than 1.3 million passengers and less than 180,000 operations annually (FAA 2015a).</li> <li>• There are no ADEC-reported PM2.5 or PM10 (i.e., particulate matter 2.5 or 10 microns, respectively) data or concerns with suspended particulate matter at Deadhorse.</li> <li>• Temporary impacts from construction are described in Section 4.7.</li> </ul>
Coastal Resources	<ul style="list-style-type: none"> <li>• A Coastal Zone Management Plan for the North Slope Borough was adopted in 1988 as part of the State of Alaska and National Coastal Management programs under the Coastal Zone Management Act (North Slope Borough 2019). The Alaska Coastal Management Program expired on July 1, 2011, and is no longer regulatory (Alaska Statute 44.66.030). However, NSB provisions in the Alaska Coastal Management Program are retained in North Slope Borough Municipal Code (NSBMC). To comply with NSBMC, the proposed action would require approval and permitting under code Titles 12 and 19. Given the scope and location of the proposed action, effects to coastal resources would be insignificant.</li> </ul>
Farmlands	<ul style="list-style-type: none"> <li>• There are no prime or unique farmlands in or near the Deadhorse Airport as defined by the Farmland Protection Policy Act of 1981.</li> </ul>
Land and Water Conservation Fund Section 6(f) Lands	<ul style="list-style-type: none"> <li>• No Section 6(f) Land and Water Conservation Fund lands lie within or proximate to Deadhorse Airport and consequently no impacts to Section 6(f) resources.</li> </ul>

Environmental & Human Resource Impact Categories	Evaluation
Land Use	<ul style="list-style-type: none"> <li>• The proposed action area is owned by the State of Alaska and that land has been designated for airport purposes.</li> <li>• For Deadhorse Airport, the proposed action is consistent with the DOT&amp;PF Deadhorse Airport Master Plan update, which provides in its Section 4.2.11, Airport Safety Fencing and Security Fencing, that “Critical portions of the airport are fenced, but the fence does not encircle the entire airport. Fencing causes snow drifting, which becomes a maintenance issue. The Transportation Safety Administration has requested additional fencing and gates; therefore, the existing fencing is not adequate.”</li> <li>• The proposed action is consistent with the 2019-2039 North Slope Borough Comprehensive Plan goals of providing essential public infrastructure and services and improving transportation between communities.</li> <li>• The proposed action is consistent with the Alaska Department of Natural Resources North Slope Area Plan Deadhorse Airport Unit management intent to manage Deadhorse Airport under an interagency agreement with DOT&amp;PF; to manage the Dalton Highway Corridor Unit as a utility and transportation corridor to facilitate transportation of oil and gas resources from the North Slope to facilities in other areas of the state; to support subsistence hunting, fishing and gathering, recreation, and sport hunting opportunities.</li> <li>• The Alaska Department of Natural Resources North Slope Area Plan Guideline C-5 of Plan Objective C notes avoiding potential relocation costs due to climate change induced sea-level rise and diminished winter sea ice, placement of infrastructure in coastal areas susceptible to sea-level rise should be minimized to the extent practicable. The proposed action does not conflict with Objective C.</li> <li>• No land use conflicts exist.</li> </ul>
Natural Resources and Energy Supply	<ul style="list-style-type: none"> <li>• The proposed action would not change energy requirements for Deadhorse.</li> <li>• Geotechnical materials are a natural resource required for construction. An adequate volume is commercially available from local material sites. The proposed action would not result in demand exceeding available supplies.</li> </ul>
Noise and Noise-Compatible Land Use	<ul style="list-style-type: none"> <li>• The proposed action is not expected to increased existing airport noise impacts.</li> <li>• Temporary impacts from construction are addressed in Section 4.7.</li> </ul>
Socioeconomic, Environmental Justice, and Children’s Environmental Health and Safety Risk	<ul style="list-style-type: none"> <li>• The proposed action would benefit local or regional socioeconomics, children’s health and safety, and environmental justice by improving airport operational safety and efficiency in a region with a high population of Alaska Native residents that routinely use the air passenger and freight services at Deadhorse Airport.</li> <li>• Government to government consultation was commenced by FAA, and the recognized Tribes of the proposed action area include the Native Village of Nuiqsut, Kaktovik Village, and the Inupiat Community of the Arctic Slope. To date, no responses have been received and the Government-to-Government consultation process has not concluded.</li> <li>• No changes or shifts in population movement or growth, public service demands, or business and economic activity are expected to result from the proposed action.</li> </ul>

<b>Environmental &amp; Human Resource Impact Categories</b>	<b>Evaluation</b>
Visual Effects (including light emissions)	<ul style="list-style-type: none"> <li>• The proposed action would not substantively change the existing visual character of the existing developed airport or measurably increase light emissions to the surrounding community.</li> <li>• In addition to existing airport infrastructure, existing visual and aesthetic resources of the proposed action area range from transportation and active oilfield industrial infrastructure to proximate compartments of undisturbed tundra interspersed with an interconnected grid of roadway embankments, communication lines and towers, navigation light and roadway light stanchions, various fences, and pipelines. Consequently, the proposed action would also not substantively alter the overall visual character of the local area.</li> </ul>
Water Resources (partial) Surface Waters Groundwaters Wild and Scenic Rivers	<ul style="list-style-type: none"> <li>• The Sagavanirktok River is located approximately 500 feet east of the nearest proposed action construction area, and approximately 500 feet east of Mine Site 3, which would source the fill material, at Dalton Highway MP 411-412.</li> <li>• Colleen Lake is located approximately 1,400 feet north of the proposed action area's northern extent at Deadhorse Way.</li> <li>• Numerous other smaller, unnamed lakes and ponds are located throughout airport property and the Dalton Highway MP 411-412 material site area.</li> <li>• Neither the Sagavanirktok River nor Colleen Lake are listed as impaired waterbodies on the ADEC 303(d) List of Impaired Waterbodies; and no known water quality impairments to other surface waters surrounding Deadhorse Airport.</li> <li>• The proposed action would not adversely affect the airport water supply and would not have long-term effects on water quality.</li> <li>• Water quality may be affected when wetlands cannot perform their ecological function. While the proposed action results in a loss of 78.6 acres of area wetlands, loss of this acreage in and directly adjacent to a primarily heavy industrial and transportation hub facility setting, and the regionally ubiquitous nature of undisturbed, similar wetland habitats, is anticipated to result in minimal effects to area water quality and aquatic wildlife habitats. Wetland impacts are discussed in Section 4.5.</li> <li>• No private drinking water wells are located within the proposed action limits. No sole source aquifers are located in Alaska.</li> <li>• A review of the ADEC Impaired Waters mapper indicated that no impaired water bodies are located in the proposed action area.</li> <li>• Construction impacts are identified in Section 4.7.</li> <li>• No designated state or federal Wild or Scenic rivers are near the proposed action.</li> </ul>

## ***Cumulative Impacts***

**Biological Resources:** The cumulative impacts of the proposed action and present, past, and/or reasonably foreseeable projects are not anticipated to have a significant impact to biological resources.

**Hazardous Materials, Solid Waste, and Pollution Prevention:** Cumulative hazardous material or solid waste impacts of the proposed action and present, past, and/or reasonably foreseeable projects are not anticipated to be significant. Notably, no cumulative impacts of PFAS-contaminated material excavation or handling are anticipated, as materials determined to not contain levels of PFAS or petroleum constituents exceeding ADEC contamination limits would be reused as fill at their respective excavation sites, stockpiled for use in other areas containing equal to or greater than their levels of contamination or, if exceeding ADEC contamination limits, separated and stockpiled for removal to appropriate off-site disposal or remediation facilities. Combined effects of these proposed practices in conjunction with other past or potential future projects contributing to PFAS or other contamination would be to cumulatively reduce contaminant loading from the Deadhorse Airport through the proposed action.

**Historical, Architectural, Archaeological, and Cultural Resources:** The cumulative impacts of the proposed action and present, past, and/or reasonably foreseeable projects are not anticipated to have a significant impact on or adversely affect Section 106 historic, architectural, archaeological, or cultural resources.

**Department of Transportation Act Section 4(f) Resources:** The cumulative impacts of the proposed action and present, past, and/or reasonably foreseeable projects are not anticipated to have a significant impact to Section 4(f) resources.

**Water Resources:** Past actions completed at Deadhorse Airport have been developed in accordance with either the 2003 Memorandum of Agreement (MOA) concerning wetlands among FAA, U.S. Army Corps of Engineers (USACE), DOT&PF, U.S. Fish and Wildlife Service (USFWS), and the Alaska Department of Fish and Game (ADF&G) or the federal rule on Compensatory Mitigation for Losses of Aquatic Resources; Final Rule (33 CFR 325, 332) that would reduce, minimize, or compensate the extent of these impacts. Present and reasonably foreseeable actions impacting wetlands would follow the latter federal rule. The cumulative impacts of the proposed action and present, past, and/or reasonably foreseeable projects are not anticipated to have a significant impact to Section 404 wetland and WOUS resources.

**Floodplains:** The proposed action is not expected to cause a cumulatively significant floodplain encroachment or impacts in conjunction with other past, present, and foreseeable future activities in the Sagavanirktok River floodplain. The 2017 DOT&PF embankment improvements to the Dalton Highway have provided for additional flood protection of the Deadhorse Airport, and the proposed action would affect neither the condition nor the function of those improvements.

**Climate Impacts:** The proposed action would neither increase the current facility energy requirements for future airport operations nor change the nature of the aircraft fleet or operations

schedule for landings or takeoffs. Resultantly, there would be no net increase in GHG emissions due to future operations of the constructed proposed action. Additionally, there are no cumulative impacts of the proposed action and other present, past, and/or reasonably foreseeable projects anticipated. Consequently, the proposed action will generate no significant cumulative impacts on climate.

**Temporary Construction Impacts:** Proposed action alternative temporary construction impacts would not result in cumulative construction impact effects in conjunction with past, present, or future construction activities at Deadhorse Airport. No other AIP projects are scheduled or would be ongoing during construction of the proposed action alternative, and only a single project to install an antenna and support structure would likewise occur at one airport lease lot. Potential impacts from routine maintenance and operations work by airport personnel are anticipated to be only minor and temporary and would not result in cumulative impacts in association with the proposed action.

### ***Mitigation Measures & Environmental Commitments***

The need for Section 404 permit-related mitigation will be determined by USACE during the permitting process. Due to the ubiquitous, landscape-scale nature of wetlands within and around the proposed action location, and the fact that there are no wetland Mitigation Banks in the area nor in-lieu-fee programs available, DOT&PF is not proposing compensatory mitigation at the time of application. No further mitigation measures are identified herein that are a condition of project approval.

In the interest of avoiding and minimizing potential proposed action impacts, the following environmental commitments, listed by implementation scheduling (Pre-construction, In-construction, Post-construction), would be included as part of the proposed action:

#### **Pre-construction**

- DOT&PF contract documents for the proposed action will include stipulations that wildlife encountered by contractors will not be fed, hunted, chased, captured, or otherwise harassed by project contractors within the proposed action area. These stipulations would not restrict wildlife control actions conducted by authorized personnel on airport property.
- To avoid construction impacts to migratory birds, DOT&PF contract documents would not allow ground disturbing or fill activities to occur on original ground (OG) by contractors between June 1 and July 31 annually as recommended by USFWS.
- To avoid and minimize potential impacts to listed polar bears during construction activities, a USFWS recommended Polar Bear Interaction Plan will be implemented for all project field and construction personnel to follow in the unlikely event a polar bear is encountered during proposed action activities.
- The DOT&PF construction contract will contain the provision: “Should cultural or paleontological resources be discovered as a result of this activity, all work that could impact these resources will halt and the DOT&PF project engineer and the State Historic Preservation Officer (SHPO) will be notified immediately.” Work will not resume at

these sites until consultations under Section 106 and evaluation under National Register of Historic Places eligibility criteria (36 CFR 60.4) are conducted with FAA and SHPO.

- DOT&PF would include in construction contract language a standard stipulation that any project related damage or degradation to the NRHP-eligible Dalton Highway MP 398 to MP 415 Section 4(f) property would be the responsibility of the project contractor to repair to its conditions existing prior to commencement of project construction.
- The DOT&PF construction contract will include a provision that if contaminated soil or groundwater is suspected or encountered during construction activities, the construction contractor will contact the DOT&PF project engineer and stop the work so that DOT&PF can coordinate with Alaska Department of Environmental Conservation (ADEC) in accordance with 18 Alaska Administrative Code 75.300.
- A Hazardous Materials Response Plan and Spill Prevention, Control, and Countermeasures Plan would be developed and implemented by the construction contractor to identify appropriate storage, use, and disposal protocols for hazardous materials, including fuels and lubricants, present during construction and also outlining spill response protocols.
- Proposed action components would be sited to avoid wetland impacts by incorporating previously disturbed areas, existing placed fill embankments, and constructed infrastructure where practicable.
- Advance notice of construction and detours will be provided to airport users. Such notices will be published to inform users in advance to avoid or minimize potential conflicts.
- An aircraft traffic control plan and a construction safety and phasing plan will be developed and implemented during construction.
- Haul routes will be planned to avoid and minimize impacts to airport users.

### **In-construction**

- Contractors would abide by all operational and reporting stipulations in applicable required ADF&G and Alaska Department of Natural Resources (ADNR) permits regarding water withdrawal locations, timing, screening to prevent fish losses, and other activities that would potentially impact fish resources.
- Any unanticipated placement of fill and/or mechanized vegetation clearing on OG conducted between the dates of June 1 and July 31 will be completed only under a mitigative work plan approved by the USFWS under authority of the Migratory Bird Treaty Act (MBTA).
- Project equipment will be power washed/decontaminated of soils and plant materials prior to importation to the project area or demobilization to other areas to prevent the introduction to and/or increase of invasive plant materials in the proposed action site from other locations.
- Project geotechnical materials will be either of locally sourced clean fill or excavated fill reused in place (subject to applicable ADEC contamination criteria) to prevent the introduction of invasive exotic plant materials.

- Exposed mineral soils will be stabilized (geotextile, pavement, coarse gravel/rock) as soon as reasonably practicable to reduce the area of suitable ground available for uncontrolled invasive plant establishment.
- All seed or plant materials used for erosion or other stabilization and landscaping will be certified native and/or locally produced and as recommended for the region by ADNR publication “A Revegetation Manual for Alaska”.
- DOT&PF has developed and will implement a Contaminated Soils Management Plan (CSMP) to address identification, testing, handling, and disposal of potentially PFAS-contaminated material discovered or excavated during construction activities. The CSMP was reviewed and approved by ADEC. The construction contractor would implement the CSMP to avoid and minimize the release or spread of PFAS or other contamination.
- All contamination will be handled and disposed of in accordance with an ADEC-approved corrective action plan.
- All solid wastes generated during construction will be disposed of at a permitted landfill or alternatively as per the CSMP for PFAS- or petroleum contaminated materials.
- As a road accessible project location, the use of 15 parts per million sulfur standard ultra-low sulfur diesel fuel would be required for all diesel-powered highway/on-road vehicles (e.g., automobiles and trucks), non-road/off-road equipment (e.g., graders, bulldozers, backhoes), and locomotive and marine engines.
- Areas of proposed construction will be staked prior to ground disturbing activities and maintained for the duration of the construction to avoid inadvertent impacts to wetlands.
- Areas of proposed construction will maintain natural drainage patterns to the furthest extent practicable, including the installation of drainage features to allow equalization of surface water across linear project components that may affect ecological connectivity. The resolution of surface topography data collected at the site is not sufficient for identifying precise locations of needed drainage features, therefore locations will be determined on site.
- Materials will be stockpiled within the proposed action fill footprint or other permitted areas off-site (e.g., permitted commercial material sites) to avoid impacting additional ground.
- Measures to control fugitive dust such as pre-watering unpaved roads, applying a dust palliative, controlling construction traffic patterns and haul routes, and covering or otherwise stabilizing fill material stockpiles will be implemented during construction.
- One-hundred-foot setback buffers from surface waters, drainage ditches and isolated standing water will be maintained for equipment refueling and maintenance to avoid impacts from an accidental spill.
- The contractor will comply with an Alaska Pollutant Discharge Elimination System Construction General Permit and prepare and implement a Storm Water Pollution Prevention Plan (approved by DOT&PF and based on DOT&PF’s Erosion and Sediment Control Plan).
- Best Management Practices (BMPs) will be followed, including use clean or CSMP-approved fill for construction of project components, temporary use of silt fence while fill activities occur, and stabilization of disturbed areas.

- During culvert work adjacent to Taxiway A, aircraft and ground vehicles will be rerouted to maintain runway and apron access.
- The gravel apron and taxiway west of the Alaska Airlines terminal would be paved, marked, and lighted to maintain unimpeded operations for Alaska Airlines aircraft. The new pavement may remain to provide secondary Alaska Airlines terminal access during activities requiring rerouting of Alaska Airlines jet aircraft.
- The construction contractor will notify the DOT&PF project engineer of any activities that would change taxiway lighting, and this information can be broadcast to airport users.
- The project engineer will inform the DOT&PF airport manager who will coordinate and issue any required FAA Notice to Airmen (NOTAM).
- Construction activities will be staged to minimize delays to aircraft or passengers.
- During construction periods that do not require partial taxiway or apron closures, the construction contract will require the contractor to conform to FAA safety guidelines and avoid delays to aircraft or passengers.

#### **Post-construction**

- Disturbed ground will be planted with certified native seed mixtures or plants, or otherwise stabilized with geotextile, pavement, or coarse gravel/rock to prevent erosion.

#### ***Public/Agency Involvement***

The public, federal and state agencies, northern communities that rely on the Deadhorse Airport, and various local entities were consulted throughout project planning and design. Tables 9 and 10 of the Environmental Assessment summarize the tasks and activities undertaken to ensure involvement and coordination.

Scoping letters were sent on January 25, 2022 in order to solicit agency and public feedback. Comments were again solicited regarding the Draft EA starting on July 6, 2023 with comments being accepted through August 11, 2023. Records of correspondence, public scoping notice, DEA review copy transmittal notices, and DEA comments are included in Appendix J. Responses to comments received during review of the DEA can be found in Table FNSI-3.



**Table FNSI-3. Summary of DEA Comments and Responses**

<b>Commenter</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
OHA	DEA	No further comments anticipated.	No response required.
EPA	Water Resources	Recommend correcting language regarding reflecting USACE as permitting authority and determiner of mitigation requirements.	Wording has been changed in Section 4.5.1.2.3 per EPA's comment to reflect that mitigation requirements are determined by USACE.
EPA	Water Resources	Recommend description of regulatory criteria and processes utilized to screen potential alternatives.	Please see Section 2.2 for screening criteria used when evaluating viability of alternative designs. Per the EA document, DOT&PF has determined that there are no reasonably practicable alternatives that both meet the proposed action purpose and need and that would result in fewer impacts to wetlands without other adverse environmental or human impacts.
EPA	Water Resources	Recommend description of any mitigation provided to offset impacts.	Please see Section 4.5.1.2.3. Due to the ubiquitous, landscape-scale nature of wetlands within and around the proposed action location, and the fact that there are no wetland Mitigation Banks in the area nor in-lieu-fee programs available, DOT&PF is not proposing compensatory mitigation at the time of application.
EPA	Ecological Connectivity	Identify project impacts to ecological connectivity between sides of fence embankment.	An environmental commitment has been added to Section 4.5.1.2.2 in which areas of proposed construction will maintain natural drainage to the furthest extent practicable in order to maintain ecological connectivity. A paragraph analyzing potential impacts to wetland connectivity has also been added to Section 4.5.1.3.1.1.

Commenter	Topic	Summary	Response
EPA	Material Source Road	Clarify whether the existing access road would meet proposed project's needs for delivery of construction material.	Wording has been updated in Section 2.1.3 to clarify that: while the existing access road could feasibly support the projects' needs for delivery of construction material, the new haul route is proposed to minimize construction impacts on the Dalton Highway, reduce traffic on the Dalton Highway, and facilitate more efficient and less costly material hauling.
EPA	Environmental Justice	Include E.O. 14096 in Regulatory Framework section.	E.O. has been added to Regulatory Framework (Section 1.5). It is noted in Table 3 of the EA that no changes or shifts in the socioeconomic situation of the region will occur as a result of the proposed action.
EPA	Tribal Consultation	Incorporate feedback from Tribes when making decisions based on the project.	No comments were received during Government-to-Government consultation. See description of Tribal consultation in Section 4.3.3.1.1 or Table 10.

***Conclusion***

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal action for the Deadhorse Airport Improvements Project is consistent with existing national environmental policies and objectives as set forth in Section 101 of NEPA and other applicable environmental requirements, and will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(C) of NEPA.

***Point of Contact***

For further information, please direct requests to: Laura A. Sample, Environmental Protection Specialist. Federal Aviation Administration Airports Division. 222 W. 7th Avenue, MS #14 Anchorage, Alaska 99513 Telephone: (907) 271-5292

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**KRISTI WARDEN**  
**Director**  
**Aiports Division, FAA Alaska Region**

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**Date**