

# WRITTEN RE-EVALUATION

## Nunam Iqua Airport (SXP) Improvements

State Project Number #NFAPT00368/Z625970000

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## ACRONYMS AND ABBREVIATIONS

EA	Environmental Assessment
EFH	essential fish habitat
EIS	Environmental Impact Statement
FAA	Federal Aviation Administration
ft	feet
FONSI	Finding of No Significant Impact
GHG	greenhouse gas
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
SHPO	State Historic Preservation Officer
SREB	snow removal equipment building
USFWS	US Fish and Wildlife Service
WR	written re-evaluation

# 1 INTRODUCTION AND BACKGROUND

## 1.1 Introduction

This written re-evaluation (WR) evaluates whether supplemental environmental analysis is needed to support the Federal Aviation Administration (FAA) Alaskan Region Airports Division National Environmental Policy Act (NEPA) decision related to the proposed project. The affected environment and environmental impacts of Nunam Iqua Airport Improvements at Nunam Iqua (City of Sheldon Point), Alaska were analyzed in the **2010 Environmental Assessment (EA) Nunam Iqua Airport Runway Extension**. The FAA's Findings of No Significant Impact (FONSI) was issued for this action on September 2, 2010 (Appendix A). This WR provides the determination of whether the contents, analyses, and conditions of approval in the **Nunam Iqua Airport Runway Extension Environmental Assessment and Finding of No Significant Impact (FONSI)** remain current and substantially valid.

An the proposed Runway Extension project is a major Federal action subject to the requirements of the NEPA. As such, the FAA must assess the potential environmental impacts of the proposed activities (changes to the project since the 2010 EA/FONSI include activities or tasks removed from the project represented as ~~striketrough~~ and changes or additions from the project description in the 2010 EA/FONSI are represented as **red text**):

### Airport Improvements

- Widen **the runway to 75 feet (ft)** and ~~lengthen the runway to 100 feet (ft)~~ by 4,000 ft
- Widen and lengthen the runway safety area to ~~150 ft by 4,600 ft~~ **150 ft by 3,616 ft (300 ft beyond each runway end)**
- **Replace or** lengthen the culvert under the runway to meet the new runway ~~and~~ safety area width
- Lengthen the taxiway to ~~363 ft~~ **220 ft to connect new apron to runway** (existing width of 50 ft will remain the same)
- Widen existing Taxiway Safety Area to ~~118~~ **79** ft
- Construct a ~~250 ft by 400 ft~~ **275 ft by 200 ft** aircraft parking apron **and additional aviation support areas away from the runway** and ~~offset additional aviation support areas so that~~ Part 77 surfaces are not penetrated (**approximately 250 ft by 200 ft**)
- Re-use existing apron material and rehabilitate existing apron footprint
- Resurface the existing operational surfaces and apply a dust palliative to the runway **and taxiway**
- Construct a new 20 ft by **750 ft** ~~980 ft~~ airport access road (with culverts) and remove/reconstruct portions of the existing boardwalks

- ~~Relocate~~ **Replace** the segmented circle and construct new pads and access roads for the Precision Approach Path Indicator, ~~Automated Weather Observation System (AWOS)~~, segmented circle, and wind cone
- Replace Medium Intensity Runway Lights system
- ~~Acquire approximately 41.5 acres of adjacent property from Swan Lake Native Corporation and two Native allotments in order to accommodate the larger runway safety area and expanded airport boundary~~
- Remove existing snow removal equipment building (SREB) and construct a new ~~40 ft by 50 ft~~ **approximately 42 ft by 55 ft (2,310 square foot)** SREB in a new location ~~that does not create turbulence~~. Extend ~~utilities~~ overhead electric lines to new SREB

The FAA's environmental policies and procedures for implementing NEPA (FAA Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures* and DOT Order 5610.1D, *DOT's Procedures for Considering Environmental Impacts*) provide that the FAA may prepare a WR to determine whether the contents of the previously prepared environmental document and any underlying assumptions remain valid, including when considering new analysis of resources not considered in the 2010 EA/FONSI.

## 1.2 Background

The 2010 EA/FONSI evaluated upgrading the Nunam Iqua Airport from FAA A-I standards to B-II standards. The background of the EA is contained in FAA's administrative record and archives. This WR addresses results from minor changes to the Proposed Action by evaluating upgrading from FAA A-I standards to A-II standards.

## 2 PROPOSED ACTION

The FAA Proposed Action is to approve/deny the ADOT&PF's proposal to remedy deficiencies and upgrade the Nunam Iqua Airport to meet current FAA A-II design standards and enhance operational capabilities of the airport. The project will upgrade the Runway Safety Area which will enhance safety and operation capabilities of the airport. The proposed project at Nunam Iqua Airport would include (Appendix B, Figures 1 [Project Location and Vicinity] and 2 [Environmental – APE, Sheet 2]):

- Widen the runway to 75 ft
- Widen and lengthen the runway safety area to 150 ft by 3,616 ft (300 ft beyond each runway end)
- Replace or lengthen the culvert under the runway to meet the new runway safety area width
- Lengthen the taxiway to 220 ft to connect new apron to runway (existing width of 50 ft will remain the same)

- Widen existing Taxiway Safety Area to 79 ft
- Construct a 275 ft by 200 ft aircraft parking apron and additional aviation support areas away from the runway so that Part 77 surfaces are not penetrated (approximately 250 ft by 200 ft)
- Re-use existing apron material and rehabilitate existing apron
- Resurface the existing operational surfaces and apply a dust palliative to the runway and taxiway
- Construct a new 20 ft by 750 ft airport access road (with culverts) and remove/reconstruct portions of the existing boardwalks
- Replace the segmented circle and construct new pads and access roads for the Precision Approach Path Indicator, segmented circle, and wind cone
- Replace Medium Intensity Runway Lights system
- Remove existing SREB and construct a new approximately 42 ft by 55 ft (2,310 square foot) SREB in a new location. Extend utilities to new SREB

In accordance with FAA Order 1050.1G and DOT Order 5610.1D, the FAA has determined a WR is needed to determine whether the previously prepared 2010 EA/FONSI decision remains valid, and the Proposed Action does not require the preparation of a supplemental or new EA or an EIS. This determination focuses on the current affected environment and the potential impacts of the Proposed Action on resource categories. Thus, this WR determines if the analysis of the affected environment and environmental impacts in the 2010 EA/FONSI remain an applicable, accurate, and substantially valid means of reflecting the potential environmental impacts of the Proposed Action, even when considering any new and substantial information or circumstances. If the FAA determines through this WR that the updated analysis supports the finding in the 2010 EA/FONSI that the Project Action would not have significant adverse impacts on any impact category or significantly affect the quality of the human environment; then the FAA may continue to rely on the 2010 EA/FONSI.

### **3      AFFECTED ENVIRONMENT**

Located in the Yukon-Kuskokwim coastal lowland in the delta of the Yukon and Kuskokwim drainages, Nunam Iqua is on a piece of land that juts out from the southwest into Kwemeluk Pass. The area is characterized by relatively flat, poorly drained terrain with numerous lakes, marshes, and streams. Nunam Iqua (previously Sheldon Point) is approximately 500 miles northwest of Anchorage, 9 miles south of Alakanuk, and 18 miles southwest of Emmonak. It lies at 62.533610 North Latitude and -164.841110 West Longitude in Sections 10 and 15, Township 28 North, Range 84 West, Seward Meridian; US Geological Survey Kwiguk C-6 SW Quadrangle (US Geologic Survey 2020).

The town of Nunam Iqua is a Yup'ik Eskimo village. Commercial fishing is the primary economic driver, and subsistence hunting, fishing, and trapping help support the village. The 2020 population is estimated at 217 persons. The village corporate boundary encompasses 13.2 square miles of land and 5.3 square miles of water (Department of Commerce, Community, and Economic Development Story Map 2025). Nunam Iqua has easy access by boat and barge. It has a state-owned and operated gravel airstrip. Floatplanes can land at Kwemeluk Pass.

There have been changes to the regulatory environment requiring analysis since the 2010 EA/FONSI. These changes include:

- Regulatory changes since the 2010 EA/FONSI
  - **Council on Environmental Quality (CEQ) Final Rule**—took affect January 7, 2026, removing CEQ regulations implementing NEPA
  - **DOT Order 5610.1D**—updated July 1, 2025, updating DOT’s procedures and practices for implementing NEPA following the Interim Final Rule by CEQ rescinding its regulations implementing NEPA.
    - For a previously prepared EA, additional analysis may be required to support a conclusion that there are no new significant impacts and the prior environmental document remains valid for the requested action or next phase of the project
    - Reevaluation of a previously prepared EA shall occur if more than five (5) years have passed since the date the environmental document was issued and the Proposed Action has not yet begun
    - When a reevaluation indicates supplemental review is warranted due to significant, or potentially significant, new impacts, a supplemental EA or EIS will be prepared
  - **FAA Order 1050.1G** - Updated June 30, 2025, updating guidance on FAA’s requirements for implementing NEPA following the Interim Final Rule by CEQ rescinding its regulations implementing NEPA.
    - After five years FAA reevaluates the analysis in the programmatic environmental document and any underlying assumption to ensure reliance on the analysis remains valid and briefly documents its reevaluation and explains why the analysis remains valid considering any new and substantial information or circumstances. FAA may continue to rely on the document.
    - Resources not previously included in threshold summary include:
      - Surface waters
      - Groundwater

- **National Coastal Management Program under the Coastal Zone Management Act -** Alaska has withdrawn from the National Coastal Management Program as of July 1, 2011. The Coastal Zone Management Act consistency provisions no longer apply to Alaska
- **Section 7 Endangered Species Act -** Threatened species and critical habitat added since the 2010 EA/FONSI:
  - Polar Bear (critical habitat established 2011)
  - Bearded seals (listed as threatened 2013, critical habitat designated 2022)
  - Arctic ringed seals (listed as threatened 2013, critical habitat designated 2022)
  - Wood bison (establishment of a nonessential experimental population in 2014)
  - Humpback whale (not evaluated in 2010)

Otherwise, the affected environment under the Proposed Action remains largely the same as discussed in the 2010 EA/FONSI. Summary of the changes to resource impacts are presented in Table 1.

**Table 1: Summary of Resource Impact Changes to Resources Evaluated in 2010 EA/FONSI**

Resource Category	2010 EA/FONSI	Current Proposed Action	Change of Impact
Aviation Emissions and Air Quality	No long-term air impacts are anticipated. Possible short-term temporary localized air degradation during construction	No long-term air impacts are anticipated. Possible short-term temporary localized air degradation during construction	Substantially the same with a decrease in construction activity as components have been removed from the proposed action (i.e., runway lengthen and widening, excavating 223,000 less cubic yards of material)
Biological Resources (including Fish, Wildlife, and Plants)	Disturb 26 acres terrestrial areas around the airport, 74 acres of gravel/sand bar in Kwemeluk Pass to extract 295,000 cubic yards of material for the project.	Disturb 11 acres terrestrial areas around the airport, up to 35 acres of gravel/sandbar in Kwemeluk Pass to extract 72,000 cubic yards of material for the project.	Decrease of 15 acres (57.6 percent less) and 223,000 fewer cubic yards (76 percent less) of material extracted from Kwemeluk Pass
Endangered and Threatened Species	Section 7 consultation with the US Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) concurred no threatened and endangered species would be affected	Additional species listed as threatened or endangered since 2010 include: polar bear, wood bison, bearded seal, Arctic ringed seal, and critical habitat has been designated for bearded seals and Arctic ringed seals.	Consultation with USFWS and NMFS regarding new protected species within proposed action area. Similar finding of “not likely to adversely

	(Steller sea lion only species referenced at time of consultation)	Section 7 consultation with USFWS (June 23, 2025) and NMFS (April 16, 2025)	affect” any listed species or critical habitat area
Construction Impacts	Temporary minor impacts, anticipated to last three to six months	Temporary minor impacts, anticipated to last two construction seasons	Substantially the same impact with a decrease in construction activity as components have been removed from the proposed action
Department of Transportation Act, Section 4(f), and Land and Water Conservation Fund (referred to as “Section 6(f)”) )	No identified Section 4(f) or Section 6(f) resources near the project area	No identified Section 4(f) or Section 6(f) resources near the project area	No change to impacts
Coastal Zone	Coastal Project Questionnaire completed in compliance with consistency review under Alaska Coastal Zone Management Program.	Alaska no longer participates in Coastal Zone Management Program	Coastal consistency review no longer applies
Farmlands	None located in the project area	None located in the project area	No change in impacts
Floodplains	Minor long-term impacts to the overall flood-storage capacity area of Kwemeluk Pass	Minor long-term impacts to the overall flood-storage capacity area of Kwemeluk Pass	Decrease of fill in floodplain and decrease in excavated area in Kwemeluk Pass
Hazardous Materials, Solid Waste, and Pollution Prevention	Increase in short-term probability of encountering petroleum contaminated soils during construction. Short-term increase in solid waste generation during construction	Increase in short-term probability of encountering petroleum contaminated soils during construction. Short-term increase in solid waste generation during construction	No change in impacts
Historical, Architectural, Archeological, and Cultural Resources	Disturb 26 acres. Consultation with State Historic Preservation Office (SHPO) concurred “No Historic Properties Affected”	Disturb 11 acres. Consultation with SHPO, concurrence “No Historic Properties Adversely Affected”	No change to impacts
Land Use/Compatible Land Use	Acquire 41.5 acres of land. Consistent with community planning efforts	No land Acquisition. Consistent with community planning efforts	Decrease of land acquisition by 41.5 acres
Natural Resources and Energy Supply	Due to the heavy sediment loads of Kwemeluk Pass, gravel/sand removed will be replaced in a relatively short period of time and would not affect Nunam Iqua’s supply of material for future use	Due to the heavy sediment loads of Kwemeluk Pass, with less gravel/sand removed the time to replace gravel is anticipated to be less	Anticipate shorter time period for natural process to replace gravel/sand in Kwemeluk Pass

Noise and Noise-Compatible Land Use	Possible temporary short-term noise increases during construction	Possible temporary short-term noise increases during construction	Substantially the same impact, with longer duration anticipated for construction
Socioeconomics	Short-term temporary economic benefits due to construction activities (three to six months of construction). Long-term benefit to airport operations and safety	Short-term temporary economic benefits due to construction activities (three plus seasons). Long-term benefit to airport operations and safety	Duration of construction would exceed six months and has potential to provide additional economic support to the community
Children's Environmental Health and Safety Risks	Would not substantially change airport operations from its current uses; resulting in no change to the environmental health and safety of children is anticipated	Would not substantially change airport operations from its current uses; resulting in no change to the environmental health and safety of children is anticipated	No change to impacts
Light Emissions	None	None	No change to impacts
Visual Resources / Visual Character	Not evaluated in 2010 EA/FONSI	Threshold not established. Changes to the visual character would have minor changes as the airport RSA and apron would increase	Substantially the same impact but with decrease in visual impact due to runway not changing and decrease in apron square footage by 147,600 and would have less impact on the visual character of the area
Surface Waters	Culvert under runway would be extended and maintain drainage patterns. Airport access road and apron expansion places fill within ponds	Culvert under runway to be replaced and extended to maintain drainage patterns. Airport access road and apron expansion places fill within ponds	Substantially the same impact, but would improve water quality and fish habitat through replacing failing culvert under runway
Groundwater	Public water supply comes from Kwemeluk Pass and not from groundwater. Proposed action would not substantially affect the quality or quantity of water available to the community	Public water supply comes from Kwemeluk Pass and not from groundwater. Proposed action would not substantially affect the quality or quantity of water available to the community	No change to impacts
Water Quality	Short-term temporary impacts due to construction activities (excavating 295,000 cubic yards gravel/sand from Kwemeluk Pass). Long-term	Short-term temporary impacts due to construction activities (72,000 cubic yards gravel/sand from Kwemeluk Pass). Similar improvements	223,000 less cubic yards of material extracted in Kwemeluk Pass, and anticipated less duration of turbidity associated

	improvements due to erosion control		with construction activities
Wetlands	Fill 26 acres of wetlands	Fill 11 acres of wetlands	Decrease of fill in wetlands by 15 acres (57.6 percent less)
Wild and Scenic Rivers	None in the project area	None in the project area	No change to impacts
Required Permits, Approvals, and Consultations	Section 404 Permit, Alaska Coastal Management Program Coastal Consistency Review, Section 401 Water Quality Certification, Section 402 Alaska Pollutant Discharge Elimination System Construction General Permit, Section 106 Consultation, Title 16 Fish Habitat Permit, Temporary Water Use Permit (by contractor)	Section 404 Permit, Section 401 Water Quality Certification, Section 402 Alaska Pollutant Discharge Elimination System Construction General Permit, Section 106 Consultation, Title 16 Fish Habitat Permit, Temporary Water Use Permit (by contractor)	Alaska Coastal Management Program Coastal Consistency Review no longer required

## 4 RE-EVALUATION OF ENVIRONMENTAL CONSEQUENCES

The following resources were not identified within the 2010 EA/FONSI Proposed Action’s affected area and are still not present within the Proposed Action Area:

- Department of Transportation Act, Section 4(f) and Land and Water Conservation Fund (Section 6(f))
- Farmland
- Wild and Scenic Rivers

The following resource impacts were evaluated in this WR to disclose the change in impacts from the 2010 EA/FONSI (**bold** resources include updated regulations or new consultation):

- Aviation Emissions and Air Quality
- Biological Resources (Fish, Wildlife, and Plants)
  - **Endangered species**
- Construction Impacts
- **Coastal Zone**
- Floodplains
- Hazardous Materials, Solid Waste, and Pollution Prevention

- **Historical, Architectural, Archaeological, and Cultural Resources**
- Land Use/Compatible Land Use
- Natural Resources and Energy Supply
- Noise and Noise-Compatible Land Use
- Socioeconomics
- Children’s Environmental Health and Safety Risks
- Light emissions
- **Visual resources/visual character**
- **Surface Water**
- **Groundwater**
- Water Quality
- Wetlands

## **4.1 Aviation Emissions and Air Quality**

Airport capacity would not increase and the aviation emissions and air quality under the Proposed Action would be substantially the same as described in the 2010 EA/FONSI. No long-term air impacts are anticipated and possible short-term temporary localized air degradation during construction.

## **4.2 Biological Resources (including Fish, Wildlife, Vegetation, and Endangered Species)**

Biological resource impacts under the Proposed Action would be less than those impacts described in the 2010 EA/FONSI. The Proposed Action would permanently disturb approximately 11 acres of wildlife habitat, an approximate decrease in habitat disturbed by 15 acres A (decrease of 57.6 percent) from the 2010 EA/FONSI. Consultation was reinitiated with USFWS and NMFS regarding currently listed threatened and endangered species and their critical habitat.

### **4.2.1 Fish**

Impacts on essential fish habitat under the Proposed Action would be less than those impacts described in the 2010 EA/FONSI. The Proposed Action would excavate approximately 223,000 cubic yards less (approximately 76 percent less) material from Kwemeluk Pass and is anticipated to temporarily increase suspended sediment. Due to the potential presence of anadromous fish within the vicinity of the Proposed Action, consultation under the Magnuson-Stevens Conservation and Management Act was completed between FAA and NMFS.

In response to FAA's April 3, 2025, Essential Fish Habitat (EFH) Assessment, on April 23, 2025, the NMFS concurred that the Proposed Action would have minimal adverse effects to EFH. The data and analyses contained in the 2010 EA/FONSI remain substantially valid, and the Proposed Action is not anticipated to have any long-term effects on fish populations.

#### 4.2.2 Wildlife

##### Avian Populations

Impacts on avian habitat under the Proposed Action would be 11 acres, approximately 57.6 percent less habitat impacts than described in the 2010 EA/FONSI. The data and analyses contained in the 2010 EA/FONSI remain substantially valid, and the Proposed Action is not anticipated to have any long-term effects on avian populations. Where potential nesting may occur, no mechanized vegetation clearing will take place within the USFWS-recommended bird nesting window of April 20 – August 10.

##### Mammal Populations

Impacts on avian and mammal habitats under the Proposed Action would be 11 acres, approximately 57.6 percent less habitat impacts than described in the 2010 EA/FONSI. The data and analyses contained in the 2010 EA/FONSI remain substantially valid, and the Proposed Action is anticipated to have minor impacts to mammal populations due to the vast amount of similar habitat that surrounds the Proposed Action.

#### 4.2.3 Vegetation

Impacts to vegetation communities under the Proposed Action would be 9.72 acres, approximately 62.6 percent less vegetated habitat impacts than described in the 2010 EA/FONSI. The data and analyses contained in the 2010 EA/FONSI remain substantially valid, and the Proposed Action is anticipated to be relatively minor, given the vast amount of similar habitat that surrounds the Proposed Action.

#### 4.2.4 Endangered Species

Federally listed species and their critical habitat analyzed in the 2010 EA/FONSI include Steller's Eider (*Polysticta stelleri*), Spectacled Eider (*Somateria fischeri*), and Steller sea lion (*Eumetopias jubatus*). These species do not have critical habitat in the area.

A number of species and critical habitat areas have been designated as Federally listed since the finalization of the 2010 EA/FONSI. Consultation with USFWS and NMFS was conducted to determine the potential effect by the Proposed Action, as detailed below.

##### USFWS Consultation Species

Mammal species or critical habitat areas established since the 2010 EA/FONSI which occur in the vicinity of the Proposed Action include: polar bear (*Ursus maritimus*) critical habitat was designated in 2011, a nonessential experimental wood bison (*Bison bison athabasca*) population was established in 2014.

Polar Bear may occasionally pass through the proposed project area, however, preferred Polar bear habitats, such as those used for denning, feeding, and resting are not present in the vicinity of the proposed project. Impacts to Polar bears as a result of the proposed construction is anticipated to be insignificant given the proposed development is located adjacent to existing development, Polar bear density in the action area is low, and encounters are anticipated to be infrequent.

Wood Bison is listed under Section 10(j) of the Endangered Species Act as a nonessential experimental population which allows reintroduction of a species to its former range. Wood Bison is listed under Section 10(j) and not Section 7 of the Endangered Species Act.

Federally listed endangered and threatened species and designated critical habitats under USFWS jurisdiction within the vicinity of the Proposed Action include Polar Bear, Wood Bison, Steller's eider, and spectacled eider. Due to the potential presence of listed species or critical habitat within the vicinity of the Proposed Action, consultation under section 7 of the Endangered Species Act was completed between FAA and USFWS (Appendix C).

In response to FAA's April 3, 2025, Section 7 consultation finding, on June 23, 2025, the USFWS concurred that the Proposed Action is not likely to adversely affect Steller's eiders, spectacled eiders, and polar bears.

#### NMFS Consultation Species

Marine mammals or critical habitat areas established since the 2010 EA/FONSI which occur in the vicinity of the Proposed Action include: bearded seals (*Erignathus barbatus*) were listed as Threatened in 2013 and critical habitat was designated in 2022, Arctic ringed seal (*Pusa hispida hispida*) were listed as Threatened in 2013 and critical habitat was designated in 2022, and Humpback Whale (*Megaptera novaeangliae*) critical habitat was designated in 2021 (proposed action area is not within the designated critical habitat).

Bearded seal critical habitat is crossed by proposed barging route between Nunam Iqua and Nome. Project specific barging vessels may overlap with open water habitat utilized by juvenile bearded seals during the spring, summer and fall. However, barging activities are not anticipated to take place prior to sea ice recession in the spring and so barging is not anticipated to impact sea ice habitat that makes up bearded seal critical habitat. The proposed project may affect, but is not likely to adversely affect, bearded seal or their critical habitat.

Arctic ringed seal critical habitat is crossed by proposed barging route between Nunam Iqua and Nome. Project specific barging vessels may overlap with open water habitat utilized by ringed seals during the spring, summer, and fall. However, barging activities are not anticipated to take place prior to sea ice recession in the spring and so barging is not anticipated to impact sea ice habitat that makes up Arctic ringed seal critical habitat. The proposed project may affect, but is not likely to adversely affect, Arctic ringed seal or their critical habitat.

Other species consulted about in 2025, which weren't included in the 2010 consultation include: bowhead whale, North Pacific right whale, and fin whale. Bowhead whale does not have critical habitat designated. North Pacific right whale has critical habitat designated, but it does not occur in the Proposed Action area. Fin whale does not have critical habitat designated.

Federally listed endangered and threatened species and designated critical habitats under NMFS jurisdiction within the vicinity of the Proposed Action include Bearded seal, Arctic Ringed Seal, Steller Sea Lion, bowhead whale, North Pacific right whale, fin whale, and Humpback Whale. Due to the potential presence of listed species or critical habitat within the vicinity of the Proposed Action, consultation under section 7 of the Endangered Species Act was completed between FAA and National Oceanic and Atmospheric Administration (NOAA) – NMFS (Appendix C).

In response to FAA’s April 3, 2025, Section 7 consultation finding, on April 16, 2025, the NMFS concurred that the Proposed Action is not likely to adversely affect bowhead whale, bearded seal, Arctic ringed seal, Steller sea lion, North Pacific right whale, humpback whale, and fin whale.

The data and analyses contained in the 2010 EA/FONSI determined that the Proposed Action is not likely to adversely affect federally listed species. Consultation with USFWS and NMFS in 2025 concluded that the Proposed Action is not likely to adversely affect federally listed species. Therefore, the finding in the 2010 EA/FONSI remains valid.

### **4.3 Construction Impacts**

Potential impacts during construction are anticipated to be temporary and include the following:

- Localized air degradation from exhaust emissions and dust emissions from construction activities
- Fish, Wildlife, and Plants may be temporarily disturbed by the increased activity and noise but could easily avoid the area. Material extraction may create and/or alter as a result of the material extraction. Mitigation measures would minimize impacts on wildlife and fish
- Natural resources and energy supply anticipates the increase of diesel fuel consumption during construction
- Construction would minimally increase noise from heavy equipment
- Socioeconomics, and Children’s Health and Safety Risk; construction activities would stimulate the local economy through direct and indirect construction expenditures. A school is located within 600 feet of the airport. However, no impacts to school operations or environment are anticipated.
- Water quality may increase during construction through runoff over disturbed areas and from direct fill. BMPs and implementation of an erosion and sediment control plan and a stormwater pollution prevention plan would minimize impacts to water quality
- Wetlands adjacent to construction areas may be filled by sediment laden runoff over disturbed areas and from direct fill. BMPs and implementation of an erosion and sediment control plan and a stormwater pollution prevention plan would minimize impacts to wetlands

The 2010 EA/FONSI indicated construction work at the airport is expected to last from three to six months. 2025 construction is anticipated to last from summer of 2027 to fall of 2029. With the

decrease in project impacts and increase of construction duration the data and analyses contained in the 2010 EA/FONSI remain substantially valid for construction impacts.

#### **4.4 Coastal Zone**

The Nunam Iqua Airport lies within the coastal zone and the Ceñaliulriit Coastal Resource Service Area. The State of Alaska withdrew from the Coastal Management Program in 2011, and coastal consistency review is no longer required (NOAA 2011). The data and analyses in the 2010 EA/FONSI is no longer valid, as the coastal consistency review is no longer required.

#### **4.5 Floodplains**

Nunam Iqua does not participate in the National Flood Insurance Program. However, the area is a low-relief point on Kwemeluk Pass, approximately eight-miles from the Bering Sea. Kwemeluk Pass and the community of Nunam Iqua are considered to be within the 100-year floodplain (Federal Emergency Management Agency 2025). Due to the placement of fill, airport facilities are above the recommended flood elevation of eight ft mean sea level (Nunam Iqua 2008). A permit would not be required for building in the floodplain. Fill placement associated with the Proposed Action would result in approximately 17 acres less (approximately 60.6 percent less) land being elevated above the eight-foot elevation than that proposed in the 2010 EA/FONSI. The Proposed Action is anticipated to improve infrastructure flood resilience and is not anticipated to cause notable adverse impacts to natural and beneficial floodplain values. Therefore, the data and analyses contained in the 2010 EA/FONSI remain substantially valid, and the Proposed Action is anticipated to have a very minor impact on the floodplain.

#### **4.6 Hazardous Materials, Solid Waste, and Pollution Prevention**

Construction activities would increase the short-term probability or risk of a petroleum spill. Solid waste generation from construction activities would be separated into burnable and large and/or unburnable material. Burnable materials would be allowed to be disposed of in the community landfill. It is anticipated that approximately 1,000 cubic yards (SREB building) of large and/or unburnable material would be hauled off by the Contractor. BMPs and implementation of a stormwater pollution prevention plan would minimize pollution impacts to the environment. Therefore, the data and analyses contained in the 2010 EA/FONSI remain substantially valid and would not exceed the community landfill capacity.

#### **4.7 Historical, Architectural, Archeological, and Cultural Resources**

Historical, architectural, archeological, and cultural resource impacts under the Proposed Action would be similar to those impacts described in the 2010 EA/FONSI. In 2024, a field survey was conducted, and no archaeological or historic materials were identified. Early consultation with SHPO for geotechnical investigation to support design in 2024 for the Proposed Action was sent January 24, 2024, and concurrence of “No Historic Properties Affected” was received on February 28, 2024.

Project initiation letters were then sent to SHPO, and other relevant stakeholders, on February 18, 2025. A finding of “No Historic Properties Adversely Effected” was sent to SHPO, and other relevant stakeholders, on March 28, 2025. The State Historic Preservation Officer concurred on May 28, 2025 (Appendix D). Accordingly, the data and analyses contained in the 2010 EA/FONSI remain substantially valid, and the Proposed Action would not be expected to have a significant impact on historical, architectural, archeological, and cultural resources.

## **4.8 Government to Government Consultation**

Government to government consultation for the 2010 EA/FONSI was initiated with Calista Corporation, Native Village of Nunam Iqua, and Swan Lake Corporation on August 18, 2005.

Further government to government consultation occurred February 18, 2025 concerning additional Geotechnical investigation, along with the project’s current workplan.

The data and analyses contained in the 2010 EA/FONSI remain substantially valid, and the government to government consultation was completed in 2010.

## **4.9 Land Use/Compatible Land Use**

The community’s landfill and sewage lagoon are located within the FAA’s 5,000-foot separation criteria and are considered to be incompatible land use with airport operations. Both facilities are existing and considered non-conforming. The 2010 EA/FONSI proposed to acquire 41.5 acres of land adjacent to the airport to extend the runway and to relocate the apron. The Proposed Action no longer requires the acquisition of lands. The data and analyses contained in the 2010 EA/FONSI has been updated as the Proposed Action does not include acquisition of lands and is not anticipated to have an impact on compatible land uses near the airport.

## **4.10 Natural Resources and Energy Supply**

Impacts related to natural resources and energy supply under the Proposed Action are anticipated to be comparable to those impacts described in the 2010 EA/FONSI. Minor changes to the energy supply and availability of natural resources are anticipated. Kwemeluk Pass would be the material source for approximately 72,000 cubic yards of material (approximately 223,000 cubic yards less than proposed in the 2010 EA/FONSI). Due to the location of the material source and heavy sediment loads of the waterway it is anticipated that the extraction of material will not affect Nunam Iqua’s supply for material in the future. Accordingly, the data and analyses contained in the 2010 EA/FONSI remain substantially valid, and the Proposed Action would not be expected to have a significant impact related to natural resources and energy supply.

## **4.11 Noise and Noise-Compatible Land Use**

The nearest residence is approximately 0.23 miles from the end of the proposed runway in 2010, and the school is approximately 600 feet away. Both the school and the residence would be affected by some level of noise during construction of the Proposed Action. Noise associated with airport

operations is not anticipated to change. Therefore, the data and analysis contained in the 2010 EA/FONSI remain valid for noise impacts to the nearest residence and school.

#### **4.12 Socioeconomics**

The majority of the Proposed Action will have no effect on subsistence and commercial fishing because they do not involve any in-water work. Construction work is expected to last two seasons, during this time the local economy would be stimulated through direct and indirect expenditures.

The data and analysis contained in the 2010 EA/FONSI is valid as the local economy would be temporarily stimulated and increase the local economy during construction.

#### **4.13 Children's Environmental Health and Safety Risks**

The school is located approximately 600 feet from the airport. Airport operations would not substantially change from current use. As a result, no change in the environmental health and safety of children is anticipated. Therefore, the data and analysis contained in the 2010 EA/FONSI remain valid for children's environmental health and safety risks.

#### **4.14 Light Emissions**

The Proposed Action would replace the medium intensity runway lights system. Light emissions would not change substantively as the lights are designed to function as an 'on-demand' system. The lights are pilot-activated and are only lit when the runway is in use. The Proposed Action would not have substantive direct or indirect impacts from light emissions. Therefore, the data and analysis contained in the 2010 EA/FONSI remain valid for light emissions.

#### **4.15 Visual Resources/Visual Character**

The airport and community are located on a point of Kwemeluk Pass and is surrounded by wetlands and ponds. The Proposed Action would widen the RSA by 30 feet and lengthen each end of the runway by 300 feet. The SRB would be relocated closer to the community. However, the visual character of the airport would not be changed, and the new SRB location is not anticipated to block views of Kwemeluk Pass. The Proposed Action would result in negligible changes to the visual appearance of the airport. Therefore, the data and analysis contained in the 2010 EA/FONSI remain valid for visual resources/visual character.

#### **4.16 Surface Waters**

This resource was not discussed in the 2010 EA/FONSI. The existing facility is located on a point of Kwemeluk Pass and has a stream flowing through a culvert under the runway (approximately station 18+60). There are several ponds surrounding the runway, the nearest ponds were excavated as a borrow source. Approximately 1.29 acres of pond would be from widening the RSA on the west side of the runway, construction of the new airport access road, and construction of aircraft parking apron and additional aviation support areas. Culverts under the new access road would maintain hydrologic connectivity of the pond. The culvert under the runway will be replaced and be extended

outside the RSA and would impact approximately 120 linear feet of stream channel. BMPs and implementation of an erosion and sediment control plan and a stormwater pollution prevention plan would minimize impacts to surface waters.

The data and analysis contained in the 2010 EA/FONSI have been updated to include 1.29 acres filled surface waters and loss of 120 linear feet of stream channel. These impacts are anticipated to not change surface water elevations or flow patterns.

#### **4.17 Groundwater**

Groundwater was not evaluated in the 2010 EA/FONSI. The Proposed Action is located on a point of Kwemeluk Pass and surrounded by wetlands and ponds. Groundwater is shallow and may be encountered during excavation. A well was drilled in 1962 for the school. However, the community water source is Kwemeluk Pass. BMPs and implementation of an erosion and sediment control plan and a stormwater pollution prevention plan would minimize impacts to groundwater.

The data and analysis contained in the 2010 EA/FONSI have been updated to include an evaluation of groundwater. Implementation of BMPs would minimize pollution migration to groundwater. Therefore, impacts to groundwater are anticipated to be negligible.

#### **4.18 Water Quality**

Impacts on water quality under the Proposed Action would be less than impacts described in the 2010 EA/FONSI. The Proposed Action is anticipated to temporarily increase suspended solids in Kwemeluk Pass from excavating approximately 72,000 cubic yards of material from a gravel/sand bar. This temporary increase is associated with approximately 76 percent less material being extracted from Kwemeluk Pass as proposed in the 2010 EA/FONSI. While short term increases of suspended solids may result from construction activities, these increases are not anticipated to impact the community water source. Accordingly, the data and analyses contained in the 2010 EA/FONSI remain substantially valid, and the Proposed Action would not be expected to affect the quality or quantity of water available to the community.

#### **4.19 Wetlands**

Permanent impacts to wetlands under the Proposed Action would be less than impacts as described in the 2010 EA/FONSI. Permanent impacts to wetlands would consist of approximately 11 acres less (approximately 57.6 percent less than proposed in the 2010 EA/FONSI) and located mainly around the runway and to the northwest for construction of the new apron/aviation support areas. An individual Section 404 Permit has been applied for at the time of preparation of this document (Appendix E). Avoidance and minimization of wetland impacts are the only measures available to reduce total wetland impacts of the Proposed Action since wetlands compose all undeveloped land around Nunam Iqua. DOT&PF and FAA, through coordination with the US Army Corps of Engineers, will determine the need for mitigation through the Section 404 permitting process. Accordingly, the data and analyses contained in the 2010 EA/FONSI remain substantially valid, and the effect of the

Proposed Action is anticipated to be less than significant due to the lack of reasonable, practicable alternatives that meet the Proposed Action purpose and need.

## 4.20 Mitigation

There are no changes to mitigation previously agreed to, as DOT&PF and FAA through coordination with the US Army Corps of Engineers, will determine the need for mitigation through the Section 404 permitting process. Accordingly, the data and analyses contained in the 2010 EA/FONSI remain substantially valid.

# 5 CONCLUSION

The 2010 EA/FONSI examined the potential for significant environmental impacts and defined the regulatory setting for impacts associated with the modified Proposed Action as defined in Section 2.0. The resource categories evaluated (i.e. the potential issue versus non-issue categories) for environmental impacts are further analyzed and evaluated above as needed to define/disclose if any potentially significant impacts might occur from the proposed modifications to the original project description. This WR therefore determines if any potential impact(s) warrant the preparation of a Supplemental EA or an EIS.

Based on the above review and in conformity with FAA Order 1050.1G and DOT Order 5610.1D the FAA has concluded that prior environmental documentation would remain valid as the project footprint has been reduced, decreasing impacts to biological resources, floodplains, land use, water quality, and wetlands, and increasing the duration of construction prolonging effects to construction impacts, noise, and socioeconomics. Additional impact analysis has been included for endangered and threatened species, surface waters, and groundwater. Impacts are not likely to adversely affect these new resources. Therefore, the 2010 EA/FONSI finding the Proposed Action will not significantly affect the quality of the human environment or include any condition requiring consultation pursuant to Section 102(2)(c) of NEPA remains substantially valid, there are no significant environmental changes, and that all pertinent conditions and requirements of the prior approval have been met or will be met in the current Proposed Action. Therefore, the preparation of a supplemental or new environmental document is not necessary to support the FAA conclusion that the original EA's FONSI remains valid.

Responsible FAA Official:  
Laurie Suttmeier  
Airports Division, Alaskan Region  
Division Director

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Anchorage, Alaska

Date

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