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ALASKA STATE LEGISLATURE

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Sponsor Statement SB 202

“An Act relating to the liability of a Native corporation for the release or threatened release of hazardous substances present on certain lands.”

Through the Alaska Native Claims Settlement Act (ANSCA) the federal government conveyed land to Alaska Native Corporations. During the 1990s concerns were raised that contaminated land was conveyed during this process. In 1998 a Department of Interior (DOI) report to Congress on Hazardous Substance Contamination of ANSCA Lands confirmed the concerns and identified more than 650 contaminated sites requiring remediation. These sites were contaminated under ownership and/or responsibility of the federal government and then transferred to Native ownership.

A 2016 Bureau of Land Management update to the DOI report to Congress acknowledged that the agency had not acted on much of its 1998 report recommendations. The update identified the Department of Defense as the single largest pre-transfer owner of contaminated sites still requiring cleanup. The Alaska Native Village Corporation Association testified on the problem as recently as last summer before a congressional committee, pushing for the federal government to deal with the problem sites. The Alaska Native Village Corporation Association's federal legislative priority list includes protecting Alaska Native corporations from liability claims over land that was contaminated before it was transferred to a Native corporation.

SB 202 amends Alaska state statute so that an Alaska Native corporation is not liable for containment, removal or remediation actions if the contamination occurred on the land before it was transferred under the Alaska Native Claims Settlement Act. Though this change in state law would not solve the federal issues of this problem, it is an important step toward protecting Alaska Native corporations from liability for actions by prior owners of the land.

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Sectional Analysis SB 202

“An Act relating to the liability of a Native corporation for the release or threatened release of hazardous substances present on certain lands.”

Section 1

Amends AS 46.03.822(a) to add subsection (n) which relieves Native corporations from liability if the Native corporation can prove the hazardous materials were already present on the land before the land was transferred to the Native corporation under the Alaska Native Claims Settlement Act (43 U.S.C 1601 et seq.)

Section 2

Amends AS 46.03.822(m) to add a new paragraph that defines Native Corporation to have the same meaning as in federal law under U.S.C 1602(m)

Section 3

Amends AS 46.03.822 to add a new subsection (n) that relieves Native corporations from liability if the Native corporation can prove the hazardous materials were already present on the land before the land was transferred to the Native corporation under the Alaska Native Claims Settlement Act (43 U.S.C 1601 et seq.)

Section 4

Repeals AS 46.03.822 (c)(3) which is a narrower exemption for Native corporations currently in statute and replaces it with the exemption in AS 46.06.822

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REPORT TO CONGRESS

**HAZARDOUS SUBSTANCE
CONTAMINATION OF
ALASKA NATIVE CLAIMS SETTLEMENT ACT
LANDS IN ALASKA**

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U.S. DEPARTMENT OF THE INTERIOR

DECEMBER, 1998



Report to Congress

**Hazardous Substance Contamination of
Alaska Native Claims Settlement Act
Lands In Alaska**

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Glossary of Acronyms and Abbreviations

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
AFN	Alaska Federation of Natives
ANA	Administration for Native Americans
ANCSA	Alaska Native Claims Settlement Act
AS	Alaska Statute
ATSDR	Agency for Toxic Substances and Disease Registry
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CFR	Code of Federal Regulations
CIRI	Cook Inlet Region, Incorporated
COE	Corps of Engineers
DERA	Defense Environmental Restoration Account
DERP	Defense Environmental Restoration Program
DEW	Distant early warning
DOD	Department of Defense
DOI	Department of the Interior
EPA	Environmental Protection Agency
FAA	Federal Aviation Administration
FTE	Full time equivalent
FWS	Fish and Wildlife Service
FUDS	Formerly Used Defense Site(s)
GIS	Geographic Information System(s)
IHS	Indian Health Service
JRETC	Joint Regional Environmental Training Center
LD	Lands Decisions
NPL	National Priorities List(s)
NOAA	National Oceanic and Atmospheric Administration
PCB	Polychlorinated biphenyl
PLO	Public Land Order
POL	Petroleum, oil, lubricants
PRP	Potentially responsible party
RCRA	Resource Conservation and Recovery Act
SARA	Superfund Amendments and Reauthorization Act
U.S.C.	United States Code

EXECUTIVE SUMMARY

Contamination of ANCSA Lands

Section 103 of Public Law 104-42, dated November 2, 1995, directed the Secretary of the Interior to prepare this report on the extent of hazardous substance contamination on lands in Alaska transferred to Alaska Native corporations under the Alaska Native Claims Settlement Act of 1971, (Public Law 92-203, 85 Stat. 688) as amended.

ANCSA was enacted in 1971 to provide a fair and just settlement of aboriginal land claims in Alaska. ANCSA directed the conveyance of 44 million acres of land and payment of \$962.5 million to Alaska Natives as compensation for the extinguishment of claimed aboriginal title. As of September 30, 1998, all of the funds and approximately 37.3 million acres of land had been conveyed to ANCSA Native Corporations. (Approximately 6.7 million acres remained to be conveyed.) Over the last several years, the Native community has expressed concerns over health, safety, and economic issues relating to the presence of hazardous materials or other forms of contamination and hazards such as abandoned buildings, bunker structures, abandoned equipment and so forth, on lands conveyed to them under ANCSA. There is no accurate means of knowing precisely the extent of environmental contamination that existed on public lands at the time of conveyance from the United States. The law did not require DOI to conduct physical inspections of Federal lands or property before transferring them to Native corporations; the lands to be conveyed were vast (the equivalent of nearly half the State of California); and the concepts of what constitutes contamination have evolved with the passage of various environmental laws since ANCSA was passed.

Data collected during this and an earlier study indicate that there are at least 383 sites in existing Federal cleanup programs on ANCSA lands (see table, p.18). This represents most known sites. While we believe most hazardous sites have been identified and placed on Federal cleanup program lists, it is difficult to determine the exact number of sites because there is no comprehensive inventory, agencies have not all focused equally as yet on inventory of such sites, and the several existing inventories of Federal and State agencies are incomplete and in incompatible formats, resulting in inaccuracies and duplication. It is also not known how many of these sites existed prior to conveyance. Another problem complicating site identification is the concern of landowners for potential legal liability attached to contamination on their land to which they may not have contributed. Thus, ANCSA landowners¹ are understandably reluctant to report potential sites. We believe that these concerns can be alleviated by a better understanding of EPA's policies concerning transferees of federal property, described further in section 5 and Appendix K.

¹ For purposes of this report, Native or ANCSA landowner refers to the current owner of land originally transferred to an Alaska Native corporation pursuant to the Alaska Native Claims Settlement Act.

This report recommends an approach to fully identify contaminated sites and cleanup needs on ANCSA lands. With respect to lands yet to be conveyed, we will take all practicable steps to avert the future conveyance of contaminated land. With active involvement by Native, State of Alaska, Federal, and other stakeholders, an accurate inventory will be developed identifying as yet unknown and currently known, but possibly unreported, sites that are not covered by an existing program. This will enable the Department to report back to Congress regarding additional action that may be required for sites that are not covered in current cleanup programs. The report recommends in Section 7.0 that six steps be taken.

- 1. Establish a forum of ANCSA landowners and Federal, State, local and Tribal agencies for exchanging information, discussing issues, and setting priorities;**
- 2. Compile a coordinated, comprehensive inventory of contaminated sites with input from all parties;**
- 3. Apply EPA policies to ANCSA landowners, not to impose landowner liability to federal transferees for contamination existing at the time of conveyance, where the landowner has not contributed to the contamination;**
- 4. Analyze the data collected and report to Congress on sites not covered in existing programs and recommend whether further Federal programs or actions are needed;**
- 5. Modify policies, where needed, to address contaminants and structures that may affect public health and safety on ANCSA lands; and**
- 6. Continue to develop, under the leadership of the EPA and any other relevant agencies, a process to train and enable local residents to better participate in cleanup efforts.**

The Department of the Interior will coordinate implementation of these recommendations, although other agencies such as EPA and the Corps of Engineers may take the lead in certain aspects of the recommendations. See section 7 for further details.

1.0 PURPOSE OF THE REPORT

In November, 1995, Congress passed Section 103 of Public Law 104-42 amending ANCSA.² This amendment resulted, in part, from concerns put forward by Alaska Native corporations about the presence of hazardous wastes on lands transferred from Federal ownership to the Native corporations pursuant to ANCSA. In this amendment to ANCSA, Congress directed the Secretary of the Interior, who is responsible for the transfer of ANCSA lands, to examine and report back to Congress on this issue. We regret that for a variety of reasons, including the complexity of the subject matter, the need to search and organize a large amount of information from many scattered sources, the number of agencies involved, and the difficulty of resolving policy considerations and possible cost impacts of the report, the report has taken longer than the established time. Section 103 defined the issues to be addressed in this report.

Public Law 104-42, Section 103 Settlement of Claims Arising from Hazardous Substance Contamination of Transferred Lands

The Alaska Native Claims Settlement Act (43 U.S.C. 1601 et seq) is amended by adding at the end the following:

Claims Arising From Contamination of Transferred Lands

Sec. 40. (a) As used in this section the term "contaminant" means hazardous substance harmful to public health or the environment, including friable asbestos.

(b) Within 18 months of enactment of this section, and after consultation with the Secretary of Agriculture, State of Alaska, and appropriate Alaska Native corporations and organizations, the Secretary shall submit to the Committee on Resources of the House of Representatives and the Committee on Energy and Natural Resources of the Senate, a report addressing issues presented by the presence of contaminants on lands conveyed or prioritized for conveyance to such corporations pursuant to this Act. Such report shall consist of:

- (1) existing information concerning the nature and types of contaminants present on such lands prior to conveyance to Alaska Native corporations;
- (2) existing information identifying to the extent practicable the existence and availability of potentially responsible parties for the removal and remediation of the effects of such contaminants;
- (3) identification of existing remedies;
- (4) recommendations for any additional legislation that the Secretary concludes is necessary to remedy the problem on the lands; and
- (5) in addition to the identification of contaminants, identification of structures known to have asbestos present and recommendations to inform Native landowners on the containment of asbestos.

² 43 U.S.C. 1601

2.0 PERSPECTIVE ON ALASKA NATIVE LANDS

When the Alaska Statehood Act was enacted in July, 1958, approximately 99 percent of the land in Alaska was Federally owned.

ANCSA was enacted in 1971 to provide a fair and just settlement of aboriginal land claims in Alaska. ANCSA directed the conveyance of 44 million acres of land and payment of \$962.5 million to Alaska Natives as compensation for the extinguishment of claimed aboriginal title. Native corporations formed under ANCSA had to select the lands to which they would obtain title from lands withdrawn from the public domain by the Secretary of the Interior. The majority of the lands received under ANCSA were traditionally used and occupied by the respective Native villages. The land transfer process is administered by the Bureau of Land Management (BLM).

Under ANCSA, the Native village corporations are entitled to receive surface rights to approximately 22 million acres of land. Individual village corporations are entitled to receive between 69,120 to 161,230 acres, depending on the Native population of the village in 1970. The Native regional corporations, generally speaking, hold subsurface rights to the lands selected by the village corporations. Those regional corporations that had small enrolled populations, but covered large land areas, were entitled to select, under a complex "land lost" formula, an additional 16 million acres to which they hold surface and subsurface rights.

Another 4 million acres was conveyed to Village Corporations occupying former reservations. Any village corporation which elected to receive its former reservation did not receive any money or other benefits under ANCSA. Native village corporations were given a three-year period to make their selections and Native regional corporations were given an overlapping four-year period to select their lands. Originally there were 213 village corporations. Because of mergers, there are now 173 village corporations and 13 regional corporations.³

A report entitled *Alaska Natives and the Land*, a study mandated by Congress to assess the current status of Alaska Natives, states that in 1966 about 70 percent of Alaska's 53,000 Native people lived in 178 predominantly Native communities. The communities were small, the median size was 155 people. They were remote, with fewer than a dozen on the State's limited road network, and only 23 had telephone service linking them to other places. The people relied on hunting, fishing, trapping, and other food-gathering activities for their livelihood.

The legislative history of ANCSA indicates that it was intended to compensate Alaska Natives for the extinguishment of title to lands they claimed. At the same time, Congress intended to address the social, cultural, and economic history of the Native people. The majority of Native

³ The thirteenth Native regional corporation is a landless corporation.

communities are remote and the people continue to depend on the lands for their sustenance and cultural traditions.

ANCSA required Native village corporations to select all available public lands within the core townships surrounding their villages. Section 3(e) of ANCSA defines the term public lands as "all Federal lands and interests therein located in Alaska except: 1) the smallest practicable tract, as determined by the Secretary of the Interior, enclosing land actually used in connection with the administration of any Federal installation ..." "Public lands," as defined by Section 3(e), were available for selection by Native corporations, except where such lands were reserved for military or park purposes. To implement Section 3(e), each Federal agency in Alaska with any landholdings was requested by BLM in 1972 to determine which, if any, lands could be relinquished without adversely affecting their programs or goals. In response, the FAA, military departments, and other Federal agencies made some of their holdings available for Native selection. In some instances, Federal improvements were conveyed to Native corporations. Also, some Federal improvements, including former military sites, were conveyed to CIRI, pursuant to a property pool agreement, so that CIRI's land entitlement could be fulfilled (Subsection 12(b)(6) of the Act of January 2, 1976).

Once a Native village corporation receives its land conveyances it is obligated to reconvey up to 1,280 acres of land, unless mutually agreed otherwise by the parties, for present or future municipalities for use as community developments or for future community expansion. In addition, the village must reconvey to individual residents for primary place of residence, business, headquarter sites, reindeer husbandry and subsistence campsites; to nonprofit corporations for hospitals, churches, etc.; and to the State of Alaska for existing airports and air navigation facilities.

ANCSA fashioned a complex settlement for a complex situation. The claims resolution ANCSA formulated was unprecedented in spirit, in scope, and in substance. Nevertheless, few realized at the time of passage how long and difficult the implementation of ANCSA would be. This has necessitated various amendments to ANCSA.

The first ANCSA conveyance occurred in March, 1974. As of September 30, 1998, approximately 37.3 million acres of land had been conveyed to ANCSA Native Corporations. Approximately 6.7 million acres remained to be conveyed.

Over the last several years, the Native community has expressed concerns over health, safety, and economic issues relating to the presence of hazardous materials or other forms of contamination and hazards such as abandoned buildings, bunker structures, abandoned equipment and so forth, on lands conveyed to them under ANCSA. It is hoped that this report will lead to understanding the scope of the problem and its resolution. It is important that local concerns and life-styles be considered in the identification and remediation of contaminated sites, because of the closeness of the Native people to the land in both proximity and ideology. With respect to lands yet to be conveyed, we will take all practicable steps to avert the future conveyance of contaminated land.

Cash and budgets are critical issues. Most communities faced with several important competing priorities and limited resources are not likely to identify contamination issues to be the most critical need requiring attention. For instance, it is estimated by the Indian Health Service that needed water and wastewater projects alone will cost approximately \$880 million to complete.

The maps in Appendix B show the extent of ANCSA transferred lands in Alaska. Since priorities for selection may vary by Native corporations over time, it is not feasible to identify lands "prioritized for conveyance."

FIGURE 1

Native Corp. Boundaries

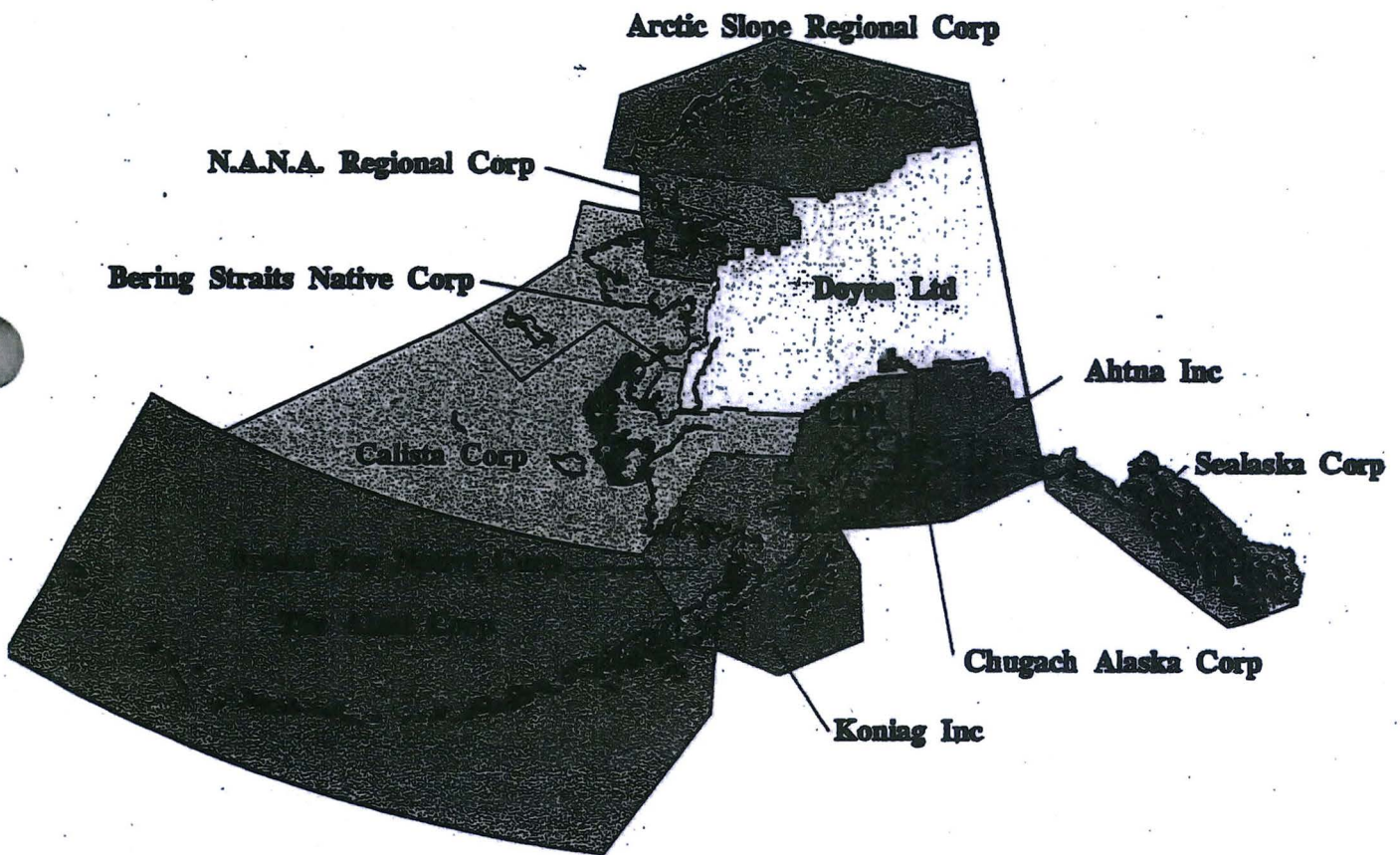


Table 1.

Native Population by ANCSA Region

Source: 1990 Census Data

<u>CORPORATION</u>	<u>NATIVE POPULATION</u>	<u>TOTAL POPULATION</u> (INCLUDING NON-NATIVE)
AHTNA, INC.	592	3,089
ALEUT CORP.	2,118	11,942
ARCTIC SLOPE	4,336	5,979
BERING STRAITS	6,418	8,288
BRISTOL BAY	4,639	7,028
CALISTA CORP.	16,775	19,447
CHUGACH ALASKA	1,550	11,450
COOK INLET REGION	18,581	302,473
DOYON, LTD.	10,793	91,936
KONIAG, INC.	2,126	13,309
NANA	5,209	6,113
SEALASKA CORP.	<u>11,622</u>	<u>67,520</u>
TOTAL	84,489	548,574

Total Native Population is 84,489 or 15.4% of the total State population as of the 1990 Census.

3.0 NATURE AND TYPES OF CONTAMINANTS PRESENT AT THE TIME OF CONVEYANCE

There is no accurate means of knowing precisely the extent of environmental contamination that existed on the public lands at the time of conveyance from the United States to ANCSA Native corporations. Many sites were known. However, the law did not require DOI to conduct physical inspections of Federal lands or property before transferring them to Native corporations; the lands to be conveyed were vast (the equivalent of nearly half the State of California); and the concepts of contamination have evolved with the passage of various environmental laws since ANCSA was passed.

The nature and types of contamination that may exist on ANCSA conveyed lands varies depending on the type of site and previous history of use. It is possible some sites that are now posing contamination issues were not contaminated at the time of conveyance. This could be true in cases involving: storage tanks that may be leaking now but were not at the time of conveyance; buildings containing asbestos that may be friable now but was not friable or damaged at the time of conveyance; or open dump sites that have been established after conveyance.

In many cases, the signs of contamination are obvious; in other cases, it is much less obvious. The detection and measurement of contamination at a site takes place in many steps over a period of time. Determining the nature and size of the problem is the first step toward solving it; however, determining the full cost of environmental cleanup is time consuming and involves an assessment of potential problems at each site.

Contamination of lands is often the result of uses to which the land was put. Section 3.2 discusses military land uses in Alaska, and Section 3.3 discusses civilian uses. The land uses discussed in these sections have the potential for leaving contaminated sites on ANCSA transferred lands. Except for the formerly used defense sites program, many Federal agencies have focused their efforts on inventorying lands they currently manage. Many are just beginning to assess contamination issues on formerly owned or used facilities. Uncertainty remains as to what contaminants lie on the millions of acres of lands conveyed to Native corporations. The possible examinations can be quite difficult and costly, given the great distances, remoteness, and difficult conditions in many cases in Alaska. Deployment alone, even for assessments, can be very costly.

3.1 Potential Types of Contamination

Types of hazardous wastes which may be found on ANCSA conveyed lands include: solvents, mining waste chemicals, PCBs, spilled fuels, explosives (including ordnance), antifreeze, batteries, oil and gas exploration wastes, pesticides, friable asbestos, mercury, arsenic, benzene, lead and leaded paint, dioxin, and POL.

Buildings containing friable asbestos, leaded paint, or other hazardous materials are another source of potential contamination. Some of these buildings are still in use today, and where they have been properly maintained, they do not pose an immediate hazard. If buildings containing asbestos were not maintained after ownership transfer, they may pose a hazard. (Where facilities have been transferred in good condition and have been allowed to deteriorate by the transferee, the Department would maintain that the responsibility for any resulting hazard should rest with the transferee.) In most cases, lands containing improvements or other facilities were conveyed at the request of the respective Native corporation. These types of sites include formerly used defense sites, FAA sites, and former BIA school sites.

Also, naturally occurring mineralized areas in some regions of the State have the potential to form acid and metal-rich waters that can carry high concentrations of toxic metals such as lead, zinc, and cadmium. Mercury-rich mineral deposits are another type of deposit scattered over a wide region in southwestern Alaska. The primary sources of mercury are naturally occurring mineral deposits (cinnabar), rocks, soils, and volcanic eruptions. We do not believe there is liability attached to naturally occurring minerals.⁴ See Appendix G.

Causes of contamination can include: above and underground fuel storage tanks, landfills and open dump sites, storage areas (fuels, chemicals, barrels, batteries, and so on), disposal pits (oil and gas exploration and development), surface impoundments and sewage lagoons, improvements with asbestos and/or leaded paint, pipelines, mine sites, formerly used defense sites, and airports.

The extent of contamination is generally of concern in five media, which could impact human health and the environment: ground water, soils, surface water, sediments, and air.

Generally, to begin to investigate a site one must determine the location and boundaries of the site, how the property has been used in the past, the type of hazardous substances that may have been released, and whether there is an obvious or known release that occurred which warrants immediate action. If immediate action is necessary, a removal action should be done according to applicable statute. If a removal action is not needed, a site investigation may need to be done to determine the extent of impacts from any releases. Depending on the magnitude of the potential problems at a site, it may be appropriate to start cleanup actions concurrently with the site investigation work. In more complex cases, a remedial investigation and baseline risk assessment may be needed. Remedial investigations are done to define the extent of contamination. Risk assessments include: 1) an exposure assessment; 2) a toxicity assessment; and 3) risk

⁴ CERCLA §104(a)(3) Limitations on Response

“The President shall not provide for a removal or remedial action under this section in response to a release or threat of release—”

“(A) of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.”

characterization. The risk assessment results are used to make risk management decisions on whether a cleanup is necessary and to help establish cleanup levels. Assessments should analyze potential risks through the subsistence consumption of fish, wildlife, or plants.

Field investigations are necessary to characterize the nature and extent of contamination and to determine if contamination occurred prior to, or after, conveyance to an ANCSA Native corporation. Federal facilities were usually authorized by land withdrawals via PLOs or by Federal appropriations under the principles of 44 LD 513. If a PLO was issued, case file records are available that may provide some information on the Federal agency's use. Past aerial photography may also be helpful to determine contamination at the time of conveyance. However, precisely identifying the sources of particular contaminants can be very difficult in some cases; for instance, in cases of landfill sites in continuous use before and after transfer.

3.2 Military Land Uses

World War II, the Japanese invasion of the Aleutians, and the Cold War had profound influence on military activities in Alaska. The military in Alaska played a significant role in the development of the territory and State. In many areas, military improvements concurrently supported civilian economic development. This was especially true in the areas of highway construction, port construction, airfield/airport expansion, and communications.

The Federal government spent over \$1.25 billion in Alaska between 1941 and 1945 in military activities and the construction of installations and facilities for the defense of the nation and in support of offensive operations. The military buildup in Alaska grew rapidly during this time. In addition, the Navy's construction battalions constructed facilities for submarines, aircraft and surface vessels in southeastern Alaska and out along the Aleutian chain. Meanwhile, numerous defense installations in central and southeastern Alaska had been completed and manned with infantry, coast artillery, and supporting branches. Before World War II had ended over 300,000 soldiers had seen duty in Alaska.

Soon after the Alaska National Guard was established in 1949, National Guard Armories were constructed in 48 remote villages, often of surplus World War II Quonset huts.

The end of the Cold War and the accompanying military drawdown has resulted in an increase in the number of closed and abandoned Alaskan military facilities. Even before the collapse of the Berlin Wall and Communism in 1989, there were about 150 closed and abandoned Cold War facilities in Alaska. A report by the General Accounting Office prepared in September, 1980, estimated that about \$110 million worth of military improvements were reported as no longer being needed.

According to the EPA, an approximate survey of what was abandoned by the military included over 6,100 Quonset and Pacific huts, 2,100 wood frame buildings, tens of thousands of POL

barrels, and countless bits and pieces of military debris. This debris includes the remains of troop quarters, mess halls, gymnasiums, warehouses, power plants with engines and generators, ammunition magazines and bomb dumps, fuel depots, garages, and workshops, runways, gun emplacements, bunkers, and miscellaneous material including live and detonated ordnance, vehicles and heavy machinery, pierced steel airstrip matting, barbed wire, communications and utility poles, cable, and pipelines. In many cases, it was cheaper to junk surplus material where it was than to remove it.

The numbers given here are statewide totals and do not represent the totals on ANCSA-conveyed lands. The following are examples of the types of facilities and the extent they were constructed throughout the State.

White Alice sites. The White Alice tropospheric communications system was "state of the art" when introduced in 1955 but became obsolete with the introduction of satellite communications in the 1970s. White Alice communications sites were used from 1955 through 1979. There were 23 sites of varying designs. The White Alice stations were deactivated and abandoned.

Alaska Communication System sites. The Alaska Communications System was built by the Army in the early 1900s to provide communications to the military and civilian communities of Alaska. It was transferred to the Air Force in 1962 and sold to RCA Alascom in 1971, pursuant to special legislation. The 24 sites included station buildings (wood frame, concrete, or prefabricated metal), radio towers, and homes for operators.

Aircraft Control and Warning Intelligence Radar sites. The Aircraft Control and Warning Intelligence Radar was used from 1949 through 1984. The design of the 18 sites consisted of a complex of 10 to 15 wood frame buildings. The central features were the radomes and operations building; however a complete complex also included: an administration building, quarters and dormitories, recreation buildings, enclosed walkways, power plant and water systems, garages, shops, warehouses and storage, an airstrip, a weather building, and a tramway. These complexes were too large and inefficient to remain in service, and the U.S. Air Force buried a number of them *in situ*.

DEW Line stations. DEW Line stations were used from 1953 through 1985. There were 19 sites of three types of DEW line stations (Main, Auxiliary, and Intermediate). The features of a main station were: a radome, four module trains of prefabricated plywood panels (for operations and living), a steel power generation building, steel hangars, a steel air terminal, a steel recreation building, a radio building, and storage warehouses and maintenance shops.

Aleutian DEW Line and White Alice Sites. Consisted of: concrete composite buildings, four billboard antennas, a steel garage, two ammunition bunkers, airstrip, a weather/terminal building, and a water pumphouse. There were 8 sites.

Testing and Monitoring Sites. There were several sites used for monitoring and material development, including three nuclear sites and four seismic sites. Nuclear activities in Alaska included nuclear tests, nuclear experiments, and seismic stations to monitor Soviet nuclear explosions.

Airbases, Ports, Loran Stations, and Garrisons. A number of airfields, navy bases, army forts, and related defense sites have been abandoned throughout the State. These sites are potential ANCSA land selections.

The process used to close some former Federal facilities has reduced opportunities for reuse or has driven up environmental restoration costs. For example, when some sites were closed and abandoned, equipment and supplies were sometimes left behind. Among the supplies were containers of hazardous substances such as brake fluid, fuel drums containing petroleum products, antifreeze, and even containers of 100 per cent PCBs. Above and underground fuel tanks containing fuel were sometimes abandoned in place. Left on site were transformers which have since been shot-up or broken open to remove copper from inside, letting cooling oils containing PCBs spill onto the ground. Vandalism, the severe Alaskan climate, and a lack of proper maintenance combined to reduce the value and opportunity for reuse of some sites.

3.3 Civilian Land Uses

Personal and community uses. ANCSA village residents have been living on and using the lands in the vicinity of their village for many years before title transferred to the respective Native corporations. Very few land use permits were ever granted to rural villages for common uses such as dump sites, fuel storage areas, power plants, and so on. In some cases, these uses by individuals, nonprofit organizations, and local governments qualified them to receive title to the land from the respective ANCSA corporation.

Approximately 140 BIA schools were formerly operated in various communities in Alaska. Upon statehood in 1959, the BIA began a process of transferring these sites to the State of Alaska. School sites were also transferred to local governments and school districts, and approximately 13 to Native corporations. These buildings typically contained asbestos and leaded paint, but were in good condition at the time of transfer. They may also have had power plants and fuel storage facilities associated with them. Appendix C provides information on the history of DOI schools in Alaska.

Airports and airstrips. Extensive development began in 1940 throughout Alaska for World War II, including the establishment of landing areas and airstrips under the coordinated effort of the War Department and numerous other federal agencies. The result was a network of airfields and runways. While some later became useful as civilian and military aviation grew, others were transferred to other ownership and use.

Storage tanks. Leaking storage tanks, both above and underground, and related pipelines, can cause ground water contamination. Leaking tanks must be removed. The procedures and technology for removing them are proven. Many small businesses and regulators perform this task on a routine basis. In some cases, even tanks that are not leaking should be removed within a reasonable period of time because of degradation over the years. Underground storage tanks are regulated under RCRA⁵ and by ADEC, which also regulates above-ground tanks at bulk fuel storage facilities with a non-crude oil storage capacity of 420,000 or more gallons, or a crude oil storage capacity of 210,000 or more gallons.

Active and Abandoned Mines. The 1872 Mining Law encouraged the exploration and production of minerals from the public lands by providing for minimal governmental involvement. As a result, miners have drilled, blasted, or excavated many areas of public domain without the activity or location being recorded or subject to any permit requirements by the United States. If the mines did not produce any valuable minerals or after production ceased, the miners often left the site with open adits (entrances), pits, tailings, and spoil piles. As the adits and piles are exposed to rain and snow the materials may break down and leach into the surrounding environment. Resulting drainage from these areas may contain heavy metals, sulfur compounds and chemicals, such as mercury and arsenic, used in the mining process. Liquid mercury has been used for the extraction of gold (amalgamation) for many years in placer operations because the gold is fine grained. While gold amalgamation is rarely used today, some liquid mercury may remain in streams near old placer operations because it was sometimes spilled, lost, or discarded.

In Alaska, the mining of gold and other valuable mineral deposits has been a major industry since the early 1900s. Many mine sites have not been located since they did not have to be recorded with the Federal government until October of 1976, at the earliest. Also, because of the vast size of the State, the time and expense of conducting field surveys are prohibitive. The map in Appendix B shows the locations of some known sites with potential mercury. Generally, mine sites are identified when a problem arises, such as pollution of a water course, which causes State or Federal regulatory agencies to investigate an active pollution source. The issue of identification and cleanup of abandoned mine sites is a statewide problem for all lands. See Appendix G for more information about environmental issues related to mineral deposits.

Dumps and solid waste disposal sites. These sites consist of general purpose landfills, as well as sludge ponds, dry wells and hazardous waste disposal areas. Some dump sites contain everything from household wastes, to batteries, pesticides, and industrial chemicals. Some landfills also include building and other debris. Site characterization, waste removal, containment, or on-site treatment are largely technical and financial issues. Typically, landfills are capped with low permeability covers, surface water diversion and leachate collection and treatment may be necessary; and in some cases, removal may be viable. Appropriate institutional controls should be established for inactive disposal sites to minimize future exposure and risks to human health.

⁵ 42 U.S.C. 6901-6992k

The Indian Health Service has identified, in a report to Congress pursuant to the Open Dumps on Indian Lands Act of 1994 (Public Law 103-399), 153 sites that appear to be on ANCSA conveyed lands. Not all of these sites are necessarily contaminated, and, it should be noted, communities will continue to need landfills.

Oil and Gas Exploration. Abandoned oil and gas wells and survey sites are located in various places throughout the State. The primary sources of contamination are the drilling mud and reserve pits, if any exist. Heavy metals, petroleum products, or solvents are the primary contaminants that may be found.

Contaminated Buildings. The primary source of contamination in buildings is leaded paint and asbestos, although some buildings may be found to have been contaminated by other hazardous materials.

3.4 Contaminated Site Inventories

Under Federal law, if anyone has knowledge of, or discovers a release of a hazardous substance as defined in CERCLA⁶ or RCRA, that information should be reported to the EPA. The EPA maintains an inventory of those sites. Under Alaska Statutes, hazardous releases are to be reported to ADEC, which also maintains a site inventory. It would be a useful management tool to have a database with mapping capabilities to record every known contaminated site in the State.

The inventories and databases identified below were used, along with the survey of Native corporations, to compile information about the nature and extent of potential contamination on lands transferred to Native corporations pursuant to ANCSA. The tables in Appendix A and maps in Appendix B are based on known information. The information depicted in the maps was acquired from various inventories. Data have not been reviewed for accuracy or field-proofed. These graphics are intended for illustrative purposes only, and do not indicate that there exists contamination at any location depicted.

Developing this information was complicated by the fact there is not a single database in the State that contains a comprehensive inventory of contaminated sites in Alaska. Often, current landowners are not identified and there is duplication between agency listings resulting from overlapping jurisdictions and varying site names.

U. S. Army Corps of Engineers (COE), Formerly Used Defense Sites (FUDS). The COE maintains a database of FUDS on all lands in Alaska, including those on Native corporation lands. The inventory for Alaska currently lists 545 sites and identifies the project name, location (by community), site number, landowner, list of contaminants, and cleanup schedule. There are approximately 112 identified FUDS on lands conveyed to ANCSA corporations. This

⁶ 42 U.S.C. 9601-9675

represents 19 percent of the statewide FUDS total. In addition, there are approximately 77 identified FUDS on ANCSA selected lands. The COE has inspected almost all eligible FUDS and has determined that no further action is required relative to hazardous materials cleanup on 80 percent of the total sites, and investigation or cleanup is in progress on most of the remaining sites. Either the COE or the EPA plans to revisit a number of these sites to verify no further action is required. The Environmental Justice Program of the EPA prepared a report in July, 1996, titled *The Alaska Military Sites Project*, (see Appendix F), which used the FUDS database and identified past and present military sites in Alaska. A number of former military sites were sought by and granted to Alaskan Native corporations.

IHS Facility Data System. This system was established by the Office of Environmental Health and Engineering to help identify health service workloads, and it identifies solid waste disposal sites. There are currently 153 open dump sites identified for purposes of compliance with the Indian Lands Open Dump Cleanup Act of 1994 (Public Law 103-399). The system includes facilities or sites where solid waste is disposed of: a sanitary landfill, open dump, and modified landfill that is not a facility for the disposal of hazardous waste. All sites are one-half acre or larger in size. Not all of these pose hazardous material issues or risks. The IHS data provides an inventory and overview of open dump sites on Native lands and does not reflect a comprehensive analysis of each site.

State of Alaska Department of Environmental Conservation—Contaminated Sites Database. Approximately 2,200 open sites are listed in this database. The majority of sites in this database involve petroleum releases, most of which were reported after the lands were conveyed to ANCSA Native corporations. At many sites where historic releases have occurred, it is nearly impossible to accurately determine when the actual release(s) occurred. This database identifies site locations by longitude and latitude coordinates for a community or known geographic area, and does not identify the current landowner. Approximately 317 sites appear to affect ANCSA-conveyed lands. This information includes sites listed in other inventories.

State of Alaska Department of Natural Resources. This list identifies of 586 petroleum exploration/production wells, water wells, injection wells, and gas wells plugged and abandoned that are onshore and not on State land that have been reported or discovered in Alaska over the years. This report lists the operator, well name, legal description, lease number, status, date completed, and other information. It is difficult to know which of these sites are located on ANCSA conveyed lands. It appears the majority are on Federal or State lands.

Environmental Protection Agency Lists. CERCLIS is a database used by EPA to list sites which have the potential for releasing hazardous substances into the environment. EPA learns of these sites through notification by the owner, citizen complaints, State and local government identification, and other EPA programs. Of the 1,676 sites listed in Region 10 EPA, 80 sites are in Alaska. A preliminary review of this list indicates there are not any sites that have been transferred to Native corporations.

EPA maintains the Federal Facilities Hazardous Waste Compliance Docket, which lists Federal facilities that require assessment to determine if they pose a threat to public health or the environment. The Docket, which lists the official name and location of all known contaminated Federal facilities, was created by Section 120(c) of CERCLA and is updated approximately twice each year. All Docket updates are published in the *Federal Register* and only deal with Federal lands, including those that may be selected for transfer to Native corporations.

1991 ANCSA Contaminated Lands Inventory. An earlier survey on this issue resulted in a report to Congress on April 15, 1991. In 1991, Section 326 of Public Law 101-512, The Interior Appropriations Bill, required the Secretary of the Interior to report to Congress information concerning lands and properties which: 1) at the time of transfer were represented or disclosed by the Federal government as being free from contaminants and subsequent to transfer, were discovered to be contaminated; or, 2) were knowingly transferred to Alaska Native corporations with contaminants. The BLM received 22 responses out of more than 200 mail-out inquiries to Native landowners and other interested parties (see Appendix A).

1996 ANCSA Contaminated Lands Inventory. As a result of over 236 mail-out inquiries sent to Native landowners and organizations as part of this project, 98 potentially contaminated sites were generally identified by 14 Native entities. Sixty-seven of these sites were found to actually be located on Native conveyed or selected lands. The reported sites involve a small number of acres situated in close proximity to some villages. Many of these sites have been identified by the COE, EPA, ADEC, other Federal or State agencies (see Appendix A).

Table 2.

Summary of Potentially Contaminated ANCSA Lands¹

Source: see Appendices A, B, and C

<u>Site Type/Inventory</u>	<u>Estimated Number of Sites on Conveyed Lands</u>
Alaska Department of Environmental Conservation Database	317 ²
Formerly Used Defense Sites (U.S. Army Corps of Engineers)	112 ³ 77 (selected lands)
Indian Health Service Open Dump Sites Inventory	153 ⁴
Mining Sites with Mercury	30 ⁵
Federal Aviation Administration Database	25 ⁶
U.S. Air Force Inventory	13 ⁷
U.S. Coast Guard Inventory	3 ⁸

¹ Estimates of known and potential sites are based on an analysis of the inventory databases discussed herein. Duplicate sites may exist. Site investigation may be required to determine whether contamination exists and if it was present at the time of conveyance.

² Includes duplicates of other sites, e.g., FUDS.

³ Included in an active program.

⁴ Included in an active program.

⁵ Includes naturally occurring instances.

⁶ Funding requested for 13 sites in FY 1999.

⁷ Included in an active program.

⁸ Included in an active program.



Figure 2.
FUDS Project Before Cleanup of 35,000 Drums
at Prince of Wales



Figure 3.
FUDS Project After Cleanup of Drums
at Prince of Wales



Figure 4.
Former FAA Site
at Middleton Island



Figure 5.
Tank Farm/Power Generation Building
at Middleton Island



Figure 6.
DEW Line Site at Port Heiden
(ANCSA selected, not conveyed)

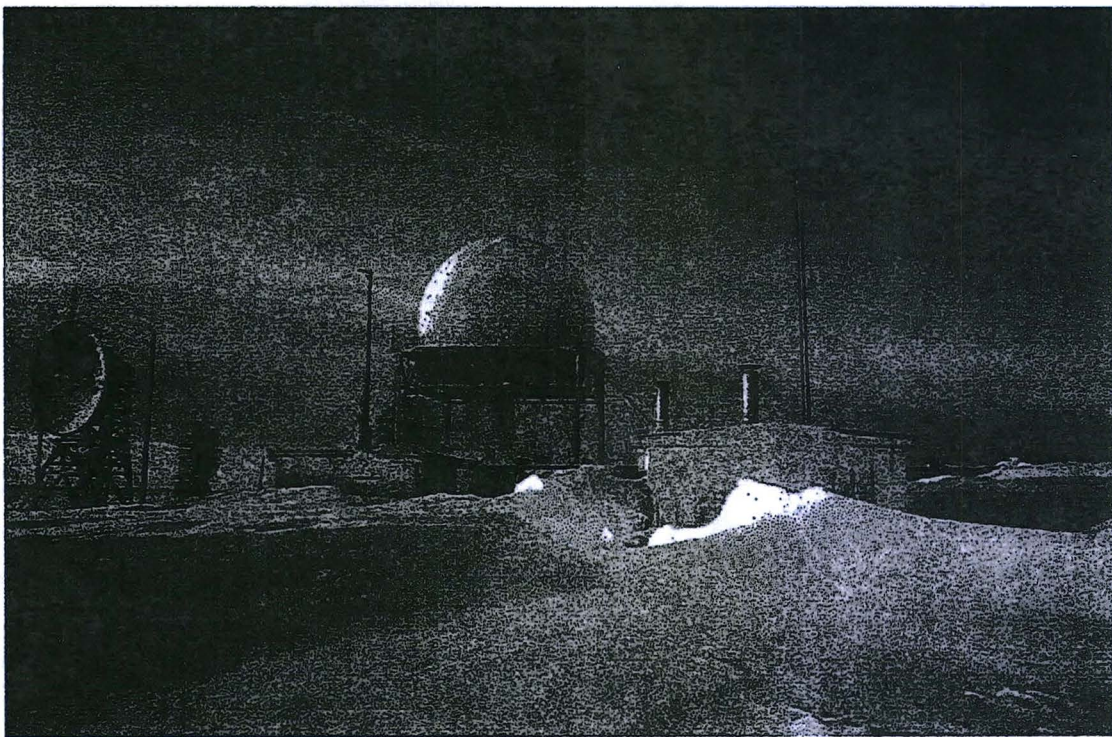


Figure 7.
Typical Radome at a
DEW Line Site in Winter

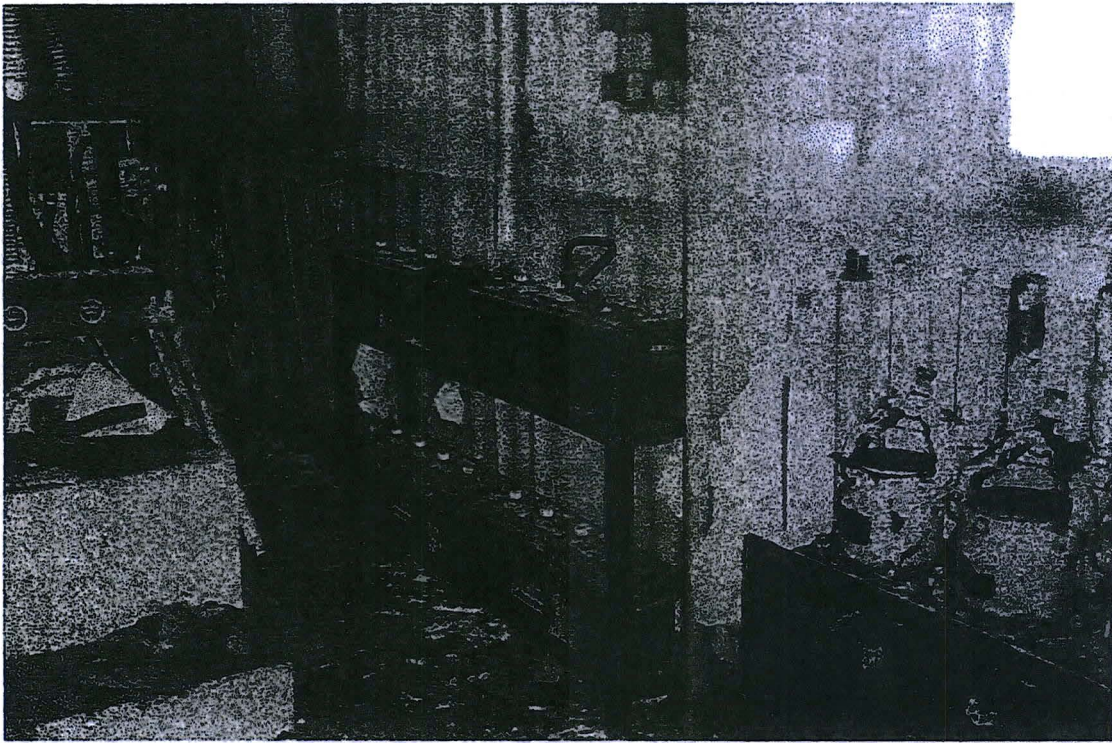


Figure 8.
Batteries inside Building (since removed)
at Middleton Island



Figure 9.
Transformers Containing PCB's at Driftwood Bay
(ANCSA selected, not conveyed)

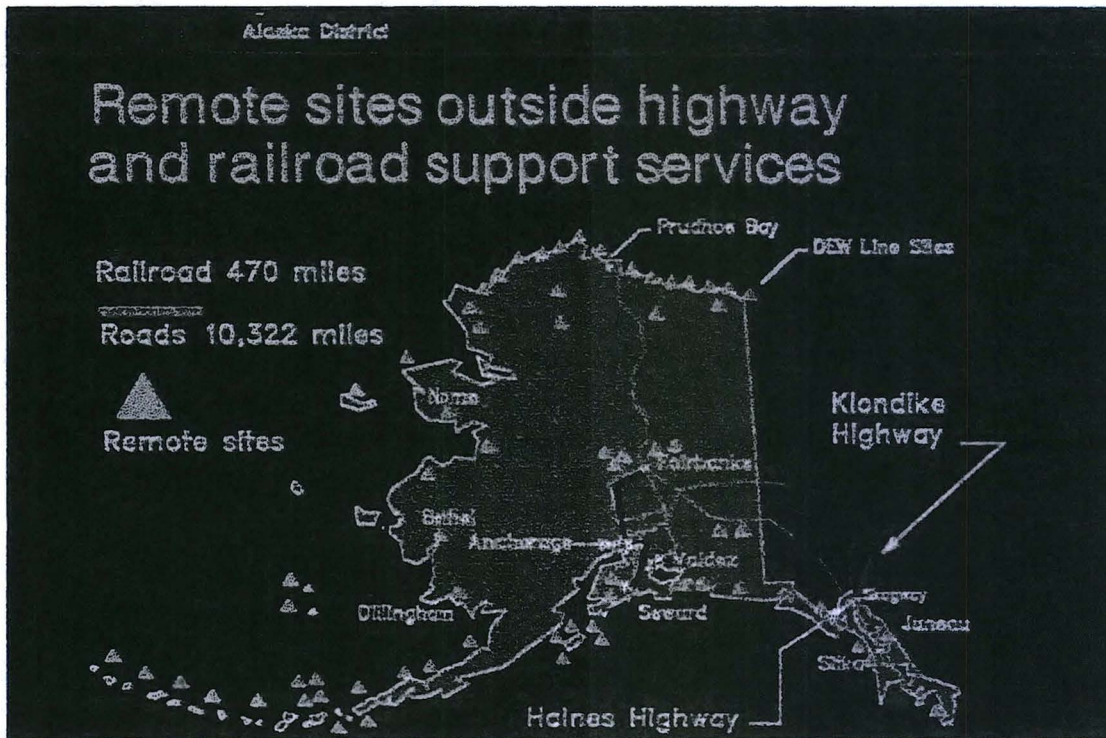


Figure 10.
Remote FUDS in Alaska



Figure 11.
**Former FAA Site at Middleton Island
Known to Contain Asbestos**

4.0 STRUCTURES KNOWN TO HAVE ASBESTOS

Asbestos is the name for a group of naturally occurring minerals that separate into strong, very fine fibers. Because asbestos is heat resistant and extremely durable, it was commonly used in pipe insulation, wallboards, and floor and ceiling tiles.

The regulations of the EPA and the Occupational Safety and Health Administration regard asbestos that is free in the air as a hazard, but generally do not consider properly used asbestos products to be a hazard. There is generally no remedial responsibility for asbestos that is properly contained or maintained and we believe that generally there should be no Federal responsibility where asbestos was properly contained upon transfer. Responsibility is more likely in the case of a release or potential release to the environment of friable asbestos.

Structures Known to Have Asbestos Present. Most of the buildings in Alaska constructed between the 1940s and the 1970s contain asbestos. Some are still in regular use without violating any law or regulation. It is difficult to give a precise total, but it would be the exception for a building constructed in Alaska between the 1940s and 1970s not to contain some asbestos.

Conveyed to ANCSA corporations, there are at least 13 former BIA school sites, 47 buildings from former FAA sites, and 30 buildings from former defense sites. The 1996 ANCSA contaminated lands survey reported an estimated 45 buildings suspected to contain asbestos.

Recommendations to Inform Native Landowners on the Containment of Asbestos. Native landowners and Corporations were provided general information about asbestos through the mail-out package sent out in April of 1996 (see Appendix I). This mailout contained information prepared by EPA about the nature of asbestos and when it becomes hazardous. Also included was a list of possible products that could be sources of asbestos, and a list of State and Federal agencies that have knowledge of asbestos problems and how to solve them.

Additional information about BIA schools is provided in Appendix C. Most of these school sites have been conveyed to the State of Alaska. Some were also conveyed to municipal corporations and ANCSA Native corporations. The Federal records do not indicate that hazardous materials and contaminants were present on the sites at the time of conveyance. However, asbestos was present in the building materials of the schools, since many of the sites were constructed when asbestos was not known to be hazardous and was commonly used and may now be friable if not properly maintained.

The EPA and other agencies or contractors regularly provide workshops on asbestos management, safety, and abatement. More information about asbestos is available from the EPA Region 10 Asbestos Division.

It is recommended that the EPA consider an agreement with the U.S. Army's Joint Regional Environmental Training Center⁷ in Anchorage, Alaska, to make its training programs available to employees or representatives from ANCSA Native corporations and Tribes. Training could be provided on environmental issues, policies, regulations, and practices involving asbestos monitoring, abatement, management, inspection, and assessment.

⁷ This training center was established in June of 1994 as a consortium of fourteen Federal, State, and local agencies to train their respective personnel on environmental and hazardous materials matters. The JRETC became operational the fall of 1997. It provides resident and nonresident environmental training in a state-of-the-art multi-media environmental training facility with fully trained and certified faculty members.

5.0 INFORMATION ABOUT POTENTIALLY RESPONSIBLE PARTIES

It is clear from the examination of past civilian and military land uses on ANCSA transferred or selected lands that both government agencies and private parties may have responsibility for cleanup of contaminated sites on ANCSA land.

One problem this study identified is the fact that ANCSA Native corporations were given this land by the United States under ANCSA as an equitable settlement based on historic interests and use, and now, under certain circumstances, ANCSA Native corporations believe they may be responsible as landowners under Federal and State environmental laws for the cleanup of contamination that was present on the lands at the time of conveyance.

However, on June 13, 1997, EPA distributed the "Policy Towards Landowners and Transferees of Federal Facilities." (Copy attached as Appendix K) The policy addresses EPA's intent to exercise their enforcement discretion and not to initiate enforcement actions against landowners and transferees for contamination existing as of the date of the conveyance of the property. The policy provides that where a person or entity acquires property from the United States that is subject to the covenants provided by section 120(h)(3) or (4) of CERCLA, EPA will not take enforcement action against a person or entity, or its transferees or successors to require the performance of response action or payment of response costs incurred to respond to contamination existing as of the date that person or entity acquires the property from the United States. EPA is also aware that even preliminary assessment and evaluation can be burdensome and expensive to a landowner, and will not seek to impose these costs against ANCSA landowners relative to contamination or potential contamination that was on their property at the time of conveyance. (However, EPA may take a CERCLA enforcement action against landowners and transferees who cause, contribute to, or exacerbate the release or threat of release of any hazardous substance, through act or omission, and EPA may seek information and access from any person pursuant to CERCLA.)

Many land transfers under ANCSA were finalized before CERCLA was enacted and the statutory covenants were required. However, EPA applies this policy to transferees and successors that acquired property from the United States in this type of situation in which the property transferred before CERCLA was enacted.⁸

⁸ Other EPA policies concerning enforcement discretion may apply to ANCSA-specific transferred lands and landowners, such as "Final Policy Toward Owners of Property Containing Contaminated Aquifers," (May 24, 1995); "Interim Policy on CERCLA Settlements Involving Municipalities and Municipal Wastes," (December 6, 1989); "Policy for Municipal and Municipal Solid Waste CERCLA Settlement at NPL Co-Disposal Sites," (February 5, 1998); or "Policy Towards Owners of Residential Property at Superfund Sites," (July 3, 1991).

Generally, under section 107(a) of CERCLA, the following four classes of parties may be held liable for response costs or natural resource damages without regard to fault:

- 1) The current owner and/or operator of the facility;
- 2) Past owner(s) or operator(s) of the facility at the time of hazardous substance disposal, or release;
- 3) Any person who arranged for disposal, treatment or transport of hazardous substances (commonly known as "generators"); and
- 4) Any person who accepted hazardous substances for transportation to the facility selected by that person.

The potentially responsible party (PRP) search process includes gathering information on the past history and uses of the site with a focus on those activities that may have used or disposed of hazardous substances. Previous owners and/or operators are identified and, if they are extant and can be located, they may be sent a request for information pursuant to CERCLA section 104(e). Federal, State, and local land records and archives will also be examined. If former employees of the facility can be identified, they may be interviewed. All of this information is compiled into a chronological history of the site.

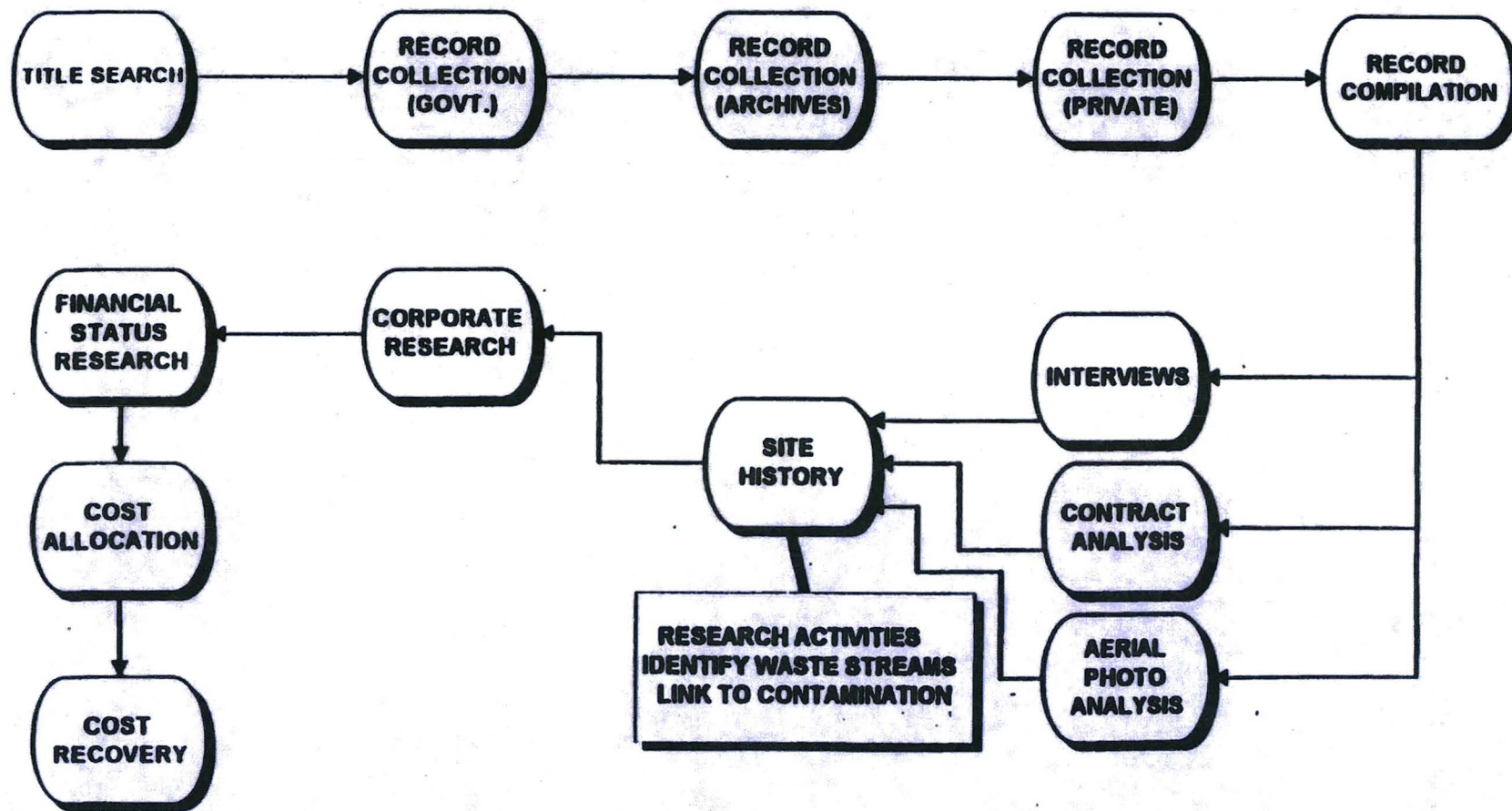
In order to perform a thorough evaluation of responsibility, every party associated with the property should, if possible, be identified and the activities of each party at the site should be determined. These activities can then be evaluated for generation of waste streams that may have resulted in the release or potential release of hazardous substances to the environment. The legal relationship of each party to the site should also be characterized so that legal responsibility can be assigned appropriately.

When contaminated sites are identified, often the party responsible for the contamination is either unknown or economically unviable. The Federal government may not be a PRP for cleanup, for instance, where it had no authority to prevent or deny permission to conduct a polluting activity by another party, such as mining activity under the Mining Law of 1872.

Appendix D includes tables identifying currently available sources of information about PRPs from local and State governments, Federal government agencies, the military, archives and libraries, recording offices, universities, museums and historical societies, and private businesses and organizations.

FIGURE 12

PRP SEARCH ELEMENTS



Source: *Potentially Responsible Party Searches* (February 1995) Techlaw Inc. Prepared for Department of the Interior, Office of Environmental Policy and Compliance.

6.0 EXISTING REMEDIES

The following are the remedies provided by Congress for dealing with hazardous substances cleanup.

CERCLA. In 1980, Congress passed CERCLA to address the cleanup of sites contaminated with hazardous substances. CERCLA has two key components. The first is a program for cleanup of hazardous waste sites. Secondly, CERCLA has a comprehensive liability scheme that enables the government or a private party to recover money spent on the cleanup, or in the case of the government, order cleanup, of a site. CERCLA established a trust fund to allow the government to conduct cleanups of hazardous substance sites. CERCLA was later amended by the SARA of 1986.

For More Information Contact: U.S. Environmental Protection Agency
Alaska Operations
(907) 271-5083 or Fax (907) 271-3424

RCRA. RCRA was adopted as an amendment to the Solid Waste Disposal Act of 1965. It was passed in order to establish a combined Federal and State regulatory program for hazardous waste sites. RCRA provides for citizen suits to abate some types of pollution.

For More Information Contact: U.S. Environmental Protection Agency
Alaska Operations
(907) 271-5083 or Fax (907) 271-3424

Alaska Department of Environmental Conservation
South Central Regional Office
(907) 269-7500 or Fax (907) 269-7649

DERP. In 1983, DERP⁹ was formally established by Congress. It provides centralized management for the cleanup of DOD hazardous waste sites. DERP also provides for limited activities to reduce the amount of hazardous waste generated and disposed and for building demolition and debris removal at FUDS. DERP is funded by five special accounts, DERA (Army, Navy, Air Force, and Defense) and the FUDS Account. This program covers cleanup of the following contaminants:

1. **Hazardous and Petroleum Waste.** This group covers identification, investigation, and cleanup of contamination at installations (including areas off the installation where

⁹ 10 U.S.C. 2701-2707 and 2810

contamination has migrated), and at FUDS. This program is focused on cleanup of contamination associated with past DOD activities to ensure that threats to public health and the environment are eliminated. The term "contaminant" is as defined in CERCLA, and also includes petroleum, oil and lubricants, and unique materials, such as biological/chemical warfare materials. This group also includes toxicological data collection.

2. **Ordnance and Explosive Waste.** This group covers identification, investigation, and removal of DOD owned and abandoned ordnance and explosives wastes that present an explosive hazard to human safety. This does not include targets and ordnance debris. This group is limited to FUDS unless specific approval is obtained. Remediation or cleaning of active ranges/disposal sites are another DOD component's responsibility.

3. **Building Demolition/Debris Removal.** This includes demolition and removal of unsafe buildings or structures at FUDS properties that were unsafe at the time of the transfer and that have not had beneficial use since transfer to State or local governments or Alaska Native corporations.

For More Information Contact:

U.S. Army Corps of Engineers
Alaska District
Formerly Used Defense Sites, Project Manager
(907) 753-5782 or Fax (907) 753-5626

Administration for Native Americans (ANA) and Department of Defense Environmental Mitigation Program. Congress recognized that DOD activities may have caused environmental problems for Indian Tribes and Alaska Native village governments and provided for the ANA to administer an Indian Lands Mitigation Program.

The program was started pursuant to the DOD Appropriations Act of November 11, 1993. This program continues under Public Law 103-335, dated September 30, 1994. Section 8094 of the Act states, "Of the funds appropriated to the DOD for Operations and Maintenance Defense-Wide, not less than \$8,000,000 shall be made available until expended to the Administration for Native Americans..."

ANA promotes the goal of social and economic self-sufficiency. ANA, through its policy and programs, supports self-determination and self-governance in accordance with the government-to-government relationship between the Federal government and the Tribes. The ANA administers several national programs and initiatives.

In 1994, Congress made \$8 million available through the ANA to provide financial assistance to Tribal entities and corporations for the express purpose of addressing site cleanup issues as a result of DOD activities. In 1995, funds were announced in the ANA's Program Announcement No. 93612-952, *Availability of Financial Assistance for the Mitigation of Environmental Impacts*

to Indian Lands due to Department of Defense Activities. Tribes were not expected to match the funding. The program was divided into four phases, covering research, planning, development, and implementation of an environmental mitigation strategy. The purpose of the announcement was to invite one to three-year proposals to undertake "any or all of the phases" of the program.

Of the 29 applications received under the first program announcement, 20 were funded. Seven grants were awarded to Native organizations in Alaska. They were as follows: Aleutian Pribilof Islands Association, Inc. (\$200,000 two year grant); Bethel Native Corporation (\$100,000 two year grant); Kuigpagmuit, Incorporated (\$100,000 one year grant); Louden Village Council (\$99,793 two year grant); Metlakatla Indian Community (\$299,020 one year grant); Uwalangin Tribe of Unalaska (\$34,945 one year grant); and Tanana Chiefs Conference, Incorporated (\$50,000 one year grant). In 1996, funds were announced in the ANA's Program Announcement No. 93612-972. Of the 25 applications received under the second program announcement, 12 were funded. These grants were awarded to Tribes in Alaska, as follows: Arctic Slope Native Association, Limited (\$170,000 two year grant), Hughes Village Council (\$50,000 one year grant), and Yakutat Tlingit Tribe (\$174,230 one year grant).

For More Information Contact: Administration for Native Americans
Department of Health and Human Services
(202) 690-7777 or Fax (202) 690-7441

The Indian Lands Open Dump Cleanup Act of 1994. Public Law 103-399, was enacted on October 22, 1994, to: 1) identify the location of open dumps on Indian and Alaska Native lands; 2) assess the relative health and environmental hazards posed by such dumps; and 3) provide financial and technical assistance to Indian Tribal governments and Alaska Native entities, either directly or by contract, to close such dumps in compliance with applicable Federal standards and regulations, or standards promulgated by an Indian Tribal government or Alaska Native entity, if such standards are more stringent than the Federal standards.

The Director of the Indian Health Service, in cooperation with the Administrator of the EPA, is to carry out the functions and purposes of this act. Among other things, the Act required a study and inventory to be completed within 12 months from enactment; annual updates to Congress concerning priorities, funding, and progress on addressing deficiencies; and a 10-year plan addressing Indian and Alaska Native solid waste deficiencies.

For More Information Contact: Alaska Area Native Health Service
Office of Environmental Health & Engineering
(907) 729-3500 or Fax (907) 271-4734

Department of Commerce—Pribilof Islands. Section 3(a) of Public Law 104-91, dated January 6, 1996, provides that the Secretary of Commerce shall, subject to the availability of appropriations, cleanup landfills, wastes, dumps, debris, storage tanks, property, hazardous or

unsafe conditions, and contaminants, including petroleum products and their derivatives left by the National Oceanic and Atmospheric Administration on the Pribilof Islands, Alaska.

For More Information Contact: National Oceanic and Atmospheric Administration
Facilities and Logistics Division
Western Administrative Service Center
(206) 526-6191

FAA—Environmental Remediation Program. In accordance with RCRA section 3016, the FAA Alaskan Region has established a continuing program to compile and submit to the EPA an inventory of current and formerly owned or operated FAA sites at which hazardous waste is stored, is treated or has been released. In accordance with CERCLA section 120, preliminary assessments have been and continue to be conducted at sites with suspected contamination. Additional investigations and removal actions are performed when required, within the risk parameters established by EPA and the State of Alaska. To date, the majority of work conducted by this program has been on currently owned or operated FAA sites, with adjacent former sites incorporated when applicable. Because of the nature of established reporting requirements, information gathered to date has not included a designation of whether sites addressed or considered were on ANCSA lands. The FAA Alaskan Region continues to proactively work with EPA, ADEC, and colocated Federal agencies to address all environmental requirements.

For More Information Contact: Federal Aviation Administration
Alaska Region Program Manager
Environment and Safety
(907) 271- 5373 or Fax (907) 271-4470

FY 1996 Defense Authorization Act. Congress directed the Department of Defense to provide for: "the mitigation of environmental impacts, including training and technical assistance to Tribes, related administrative support, the gathering of information, documenting environmental damage, developing a system for prioritization of mitigation on Indian land resulting from Department of Defense activities."

For More Information Contact: Office of Environmental Security
Conservation Team
(703) 604-0518/1747 or Fax (301) 607-3124

State of Alaska Mini-CERCLA Statute. This statute (AS 46.03.822) was amended in 1990 to address cleanup and damages resulting from the release of oil and other hazardous substances. Unlike CERCLA, Alaska's statute specifically includes liability for releases of oil and other petroleum products. AS 46.03.822 adopts CERCLA categories of parties liable for cleanup costs but also includes the owner of a hazardous substance at the time of release. AS 46.03.822 enables the State or a private party to recover money spent on the cleanup of a site. AS 46.03.822(c)(3) provides for a limited defense to liability for a Native corporation that acquired a contaminated

site under ANCSA, if the corporation begins operations to contain and cleanup the hazardous substance within a reasonable time of learning of the release.

For More Information Contact: Alaska Department of Environmental Conservation
Contaminated Sites Remediation Program
(907) 269-7664 or Fax (907) 269-7649

State of Alaska Oil and Hazardous Substance Release Prevention and Response Fund. The Alaska Legislature created this fund (AS 46.08) to provide, in part, for the cleanup of oil and hazardous substances at sites that pose an imminent and substantial threat to public health or welfare, or to the environment. ADEC can use these funds for cleanup actions, but is required to seek recovery of monies expended for site cleanup from those parties responsible under Federal or State law.

For More Information Contact: Alaska Department of Environmental Conservation
Contaminated Sites Remediation Program
(907) 269-7664 or Fax (907) 269-7649

State of Alaska Underground Storage Tank Requirements. These statutes and regulations (AS 46.03.360-AS 46.03.450, and 18 AAC 78) govern the cleanup of releases from regulated underground storage tanks. There is a financial assistance program in place for owners and operators of underground storage tank systems. The State also updated its Above Ground Storage Tank Master Plan and Issued an August, 1997, report with recommendations for bulk fuel storage improvements throughout the State.

For More Information Contact: Alaska Department of Environmental Conservation
Storage Tank Program
(907) 451-2182 or Fax (907) 451-2188

State of Alaska Solid Waste Disposal. The operation and closure of active and nonactive solid waste disposal sites are regulated by these regulations (18 AAC 60). Limited financial assistance is available in the form of solid waste facility grants (AS 46.03.030).

For More Information Contact: Alaska Department of Environmental Conservation
Division of Environmental Health
(907) 465-5162 or Fax (907) 465-5164

Other sources of information continue to evolve. For instance the University of Alaska Anchorage, Institute of Social and Economic Research, through a grant from the Environmental Protection Agency, is compiling information about contaminants in the subsistence food chain. Part of this project will entail developing a computer data base showing information that is available for each community. The Tanana Chiefs Conference is also gathering contaminants information for Native allotment lands within their region.

Agency for Toxic Substances and Disease Registry. This agency carries out public health activities required under CERCLA section 104(i) for sites where hazardous substances have been released into the environment. These activities include public health assessments and health consultations for individual sites, and, if necessary, follow-up public health studies, health surveillance, and health education for exposed communities and their health care providers.

**For More Information Contact: Associate Administrator for Federal Programs
Agency for Toxic Substances and Disease Registry
(404) 639-0730**

7.0 RECOMMENDED REMEDIES

Much has been done to identify and cleanup sites under the existing remedies discussed earlier. However, the full extent of the contaminated ANCSA lands cannot be reliably determined today and additional contaminated sites may be identified. A majority of currently known sites are being addressed under existing Federal agency programs, within available funding that must be allocated by agencies with cleanup responsibilities among the contiguous 48 states as well as in Alaska. DOI will continue to work with these programs to ensure that cleanup efforts will continue.

This report represents the compilation of available information through 1996. There is a need to do more. There have been several barriers to more complete information on the extent of the contaminated lands problem. There have been no comprehensive hazardous material surveys conducted on the bulk of the ANCSA conveyed lands. The information systems of the various Federal and State entities involved in the cleanup programs identified in Section 6.0 are not compatible or coordinated. Thus, complete information, even among current programs, may not be fully compiled. Also, under the principles of CERCLA, land ownership alone can carry with it legal responsibility for hazardous waste remediation, ANCSA landowners have been understandably reluctant to even collect, much less report to the Federal government such information concerning lands that have been conveyed to them. We need information from the affected ANCSA landowners in order to develop a suitable program.

This report recommends that the ANCSA landowners be fully informed of EPA's policy toward transferees of Federal property with respect to contamination that was on the land at the time of conveyance. We hope this will make owners more comfortable with participating in the information process. It may be that a comprehensive approach toward resolving the cleanup of ANCSA lands is needed. However, without an accurate inventory it is not possible to know if an additional Federal program is necessary. A common statewide inventory would assist in identifying sites that are not covered by an existing program. If a new program to clean up sites is necessary (phase two), it could be proposed by DOI at the end of the inventory period (phase one).

Therefore, DOI recommends the following (phase one), to be coordinated by DOI with full participation of ANCSA landowners and appropriate Federal and State agencies, to enable development of a program based on accurate data. DOI estimates currently identifiable and unfunded total costs to all Federal agencies over a three fiscal year period to accomplish phase one will be at least \$1,200,000, and possibly much more.

1. Establish a forum for ANCSA landowners and Federal, State, local, and Native agencies in Alaska. Members will include representatives of ANCSA landowners, regional and village corporations and, where appropriate, Tribes, and Federal and State regulators and cleanup program managers. DOI will establish and coordinate

this forum. The forum will meet at least four times a year to exchange information on existing cleanup programs; to discuss issues related to identification, assessment, and cleanup of contaminated sites; to identify a funding strategy; and to generally inform Native landowners about contaminants issues. This will not replace other statutory programs in place dealing with cleanup of contamination at existing sites. It is, likewise, consistent with the recommendations for stakeholder participation put forth in the Federal Facilities Environmental Restoration Dialogue Committee Final Report.

Estimated minimum costs to create and operate the ANCSA landowner/government forum (assume 14 members at 4 two-day meetings per year in Anchorage for 3 years at a cost of \$10,000 per meeting for travel and *per diem* for non-Federal members, and ¼ FTE DOI staff support at \$22,600 per year): \$187,800.

2. Create and maintain a coordinated, comprehensive inventory database of contaminated sites in Alaska, based on an existing system, such as the Corps of Engineers database, which is linked to a GIS and has Internet access, and already includes detailed information about several hundred sites, many of which are on ANCSA lands. We suggest that other agencies convert site data on their inventories to a compatible format and provide this for inclusion in the comprehensive inventory. (The integrity of the existing data bases of the participating agencies would, of course, be maintained.) DOI will compile and input ANCSA landowner data into the database. An interagency database offers reduced costs and improved sharing of information by users, as well as reduced duplication of data consistent with the Information Technology Management Reform Act. Randomly sampled site visits to evaluate and verify the database would be established pursuant to the Government Performance and Results Act.

Estimated minimum costs to compile a coordinated comprehensive inventory of contaminated sites, add sites to an existing GIS database, eliminate duplicate site records, prepare and distribute reports (assume ¼ FTE Federal staff for data input/manipulation at \$22,600 per year and \$50,000 for software support and computer operations and supplies, site visits and inventory review at \$500,000): \$617,800.

Contaminated sites shall be reported to the responsible agency within 18 months after provision of funds for implementation of this recommendation. (The time frame chosen should allow for two summers in order to gain meaningful information.)

3. Provide ANCSA landowners full knowledge of the EPA's policy not to apply CERCLA landowner liability to transferees of federal lands containing contamination at the time of ANCSA conveyance where transferees did not cause, contribute to, or exacerbate the contamination. (Estimated costs, minimal)

Sections 120(h)(3) and (4) of the CERCLA or "Superfund" address contaminated real property owned by the United States and conveyed to another party. The EPA has promulgated a related policy, Policy Towards Landowners and Transferees of Federal Facilities. EPA believes it appropriate to apply this policy to former Federal lands and facilities¹⁰ in Alaska that have been conveyed to ANCSA Native Corporations. See Section 5 for further discussion. A copy of the policy is attached as Appendix K.

4. Direct that within 30 months (12 months after the 18-month reporting period), DOI report back to Congress on sites that were identified and not covered by existing programs, and whether an additional Federal program is necessary to address those sites. Copies of the report should be forwarded to all appropriate agencies and interested parties. If sites are identified during the site inventory period that appear imminently hazardous, an analysis of the situation will be conducted to determine what response is necessary. This analysis will be carried out by the Department or agency which formerly operated the facility; if the release appears to have been created by a private party or if the earlier governmental operator cannot be identified, the analysis will be done by the EPA.

Estimated minimum costs to provide a DOI point of contact for ANCSA landowners during the project, analyze newly collected site data from the landowners and from agency site visits, coordinate with other agencies, and develop recommendations and a report on the level of program required to cleanup sites not covered in existing programs (assume ½ FTE DOI staff at \$45,200 plus \$5,000 administrative expenses per year for 3 years): \$150,600.

5. Review and, where appropriate, revise relevant policies covering existing programs that clean up contaminated ANCSA lands to address, as appropriate, the remediation of petroleum, oil, and lubricants; leaded paints; friable asbestos; and the removal of unsafe or unwanted buildings, structures, and debris. Policy adjustments to address issues of local concern would be consistent with the Federal government's special relationship with Native Americans.

Estimated costs for Federal agencies to evaluate and expand cleanup parameters for existing programs: unknown cost.

6. Continue to develop, through the EPA Tribal assistance program and in coordination with EPA and any other appropriate agencies, a process involving technical training, education, and presentation of public information in written, video, and oral formats,

¹⁰ The term "facility" is defined in CERCLA §101(9) to include "any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located."

to enhance the ability of local residents to participate in cleanup programs. Specific needs will be identified through the Forum.

Estimated minimum costs for EPA to train and educate ANCSA landowners through a variety of media (assume preparation of educational materials and a video at \$70,000; and instructors, materials and student travel and *per diem* for 2 classes of 30 persons each in Anchorage per year for 3 years): \$250,000.

8.0 CONSULTATIONS

This project was undertaken by the BLM, as the lead bureau for DOI, in cooperation with various Federal agencies, and with a goal of involving all ANCSA Native landowners and related Native organizations.

A Federal working group was formed that consisted of representatives from the Bureau of Indian Affairs, National Park Service, U.S. Fish and Wildlife Service, DOI Regional Solicitor's Office, and DOI Office of Environmental Policy and Compliance. The Department of Agriculture, U.S. Forest Service, also had a representative on the working group. The Federal Aviation Administration, U.S. Army Corps of Engineers, Environmental Protection Agency, and Indian Health Service were also consulted and provided assistance to this project.

Efforts made to notify, consult with, and inform all Native, Federal, and State stakeholders in this matter, include the following actions: (see also Appendices I and J).

1. A formal press release discussing the legislation (Public Law 104-42) and this project was distributed to all Alaska newspapers and radio stations in the State.
2. A radio interview discussing the project was taped on April 26, 1996, with the Alaska Public Radio Network. This interview was aired during two prime-time slots across more than 300 communities in the State.
3. More than five months were provided for information gathering and input from all ANCSA landowners and Native organizations. More than 236 project surveys were sent (see Appendix I). Responses were received from 18 Native entities; however, only 14 reported specific sites.
4. Before the survey was mailed out, the Alaska Federation of Natives was consulted and briefed on the project; and they reviewed the final draft survey package before it was distributed.
5. Information about the goals and objectives of this project, along with the site surveys were sent to: the Alaska Federation of Natives, the Tanana Chiefs Conference, the Association of Village Council Presidents, the Alaska Intertribal Council, the Bristol Bay Native Association, the Copper River Native Association, the Aleutian/Pribilof Islands Native Association, and many other Native organizations and Tribal entities. An explanation of the project strategy, and time frames, were included, as well as an opportunity for comments and suggestions.

6. Nearly 30 telephone calls were received from ANCSA landowners, attorneys, or individuals to discuss this project. Information packages were distributed upon request.
7. Contact was made with branches of the military (Army, Navy, and Air Force) and the Coast Guard to inform them of this project and seek their assistance in providing data.
8. Contact was made with the Regional Forester's Office, U.S. Forest Service, as representative of the Department of Agriculture.
9. The Alaska Departments of Law, Environmental Conservation, and Natural Resources were consulted.
10. Several meetings were held with the U.S. Army Corps of Engineers.
11. All Alaska Native corporations were contacted.
12. The Alaska Native organizations listed in Appendix I were contacted.
13. Preliminary Draft Report was prepared on February 20, 1997. Copies of this preliminary draft were sent for review and comment to the Federal agency working group, the Alaska Departments of Law and Environmental Conservation, and several Native corporations and associations for review and comment.
14. A meeting with the AFN Land Committee to discuss the preliminary draft report was convened in Anchorage, March 13, 1997 (see Appendix J for a meeting summary).
15. A Federal interagency review of the final draft report was held during the spring and summer of 1997. Review meetings were held with: Environmental Protection Agency, Department of Justice, Department of Health and Human Services, Indian Health Service, Department of Defense, Corps of Engineers, Office of Management and Budget, Federal Aviation Administration, and various DOI bureaus and offices.
16. A January 15, 1998, meeting with the Alaska Department of Environmental Conservation was held to discuss the latest revisions to the draft report.
17. At the January 16, 1998, meeting of the AFN Land Committee, the latest revisions to the draft report recommendations were presented and discussed.
18. February 6 and 12, 1998, Federal interagency reviews of modifications made since August, 1997 were held.
19. February 11 and 12, 1998, meetings with the Environmental Protection Agency were held to discuss report recommendations.

20. **March 3-5, 1998, an interagency coordination meeting was held with EPA, ADEC, NOAA, COE, FWS, FAA, BLM, U.S. Air Force, and Department of Defense representatives; followed up by a discussion session with ANCSA landowner and Tribal representatives.**

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LEGAL SERVICES

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MEMORANDUM

March 5, 2018

SUBJECT: Waiver of Strict Liability for Hazardous Substances on ANCSA Lands (SB 202; Work Order No. 30-LS1422\A)

TO: Senator Lyman Hoffman
Attn: Maridon Boario

FROM: Emily Nauman 
Deputy Director

You asked what the difference is between sec. 46.03.822(n), proposed under SB 202, and the exemption provided to a Native corporation provided under AS 46.03.822(c)(3), which is repealed by sec. 4 of the bill.

Section 46.03.822(n), as proposed by SB 202, waives the strict liability under AS 46.03.822 for a Native corporation for the release or threatened release of a hazardous substance occurring on land after that land was granted to the Native corporation under the Alaska Native Claims Settlement Act (43 U.S.C. 1601 et seq.) (ANCSA). The waiver of liability proposed in sec. 46.03.822(n) applies so long as (1) the release or threatened release of a hazardous substance is on ANCSA land; and (2) the hazardous substance was present on the land at the time the land was transferred to the Native corporation.

Under the current law (AS 46.03.822(b)), a person is relieved from liability under AS 46.03.822 if the person proves:

- (1) that the release or threatened release of the hazardous substance to which the damages relate occurred solely as a result of
 - (A) an act of war;
 - (B) except as provided under AS 46.03.823(c) and 46.03.825(d), an intentional or negligent act or omission of a third party, other than a party or its agents in privity of contract with, or employed by, the person, and that the person
 - (i) exercised due care with respect to the hazardous substance; and
 - (ii) took reasonable precautions against the act or omission of the third party and against the consequences of the act or omission; or
 - (C) an act of God; and
- (2) in relation to (1)(B) or (C) of this subsection, that the person, within a reasonable period of time after the act occurred,
 - (A) discovered the release or threatened release of the hazardous substance; and

(B) began operations to contain and clean up the hazardous substance.

Related to the act of a third party under contract with the person potentially liable, AS 46.03.822(c) continues, stating:

For purposes of (b)(1)(B) of this section, a third party or an agent of a third party is in privity of contract with the person who is otherwise liable, if the third party or its agent and the person are parties to a land contract, deed, or other instrument transferring title or possession of the real property on which the facility in question is located, unless that property was acquired by the person after the disposal or placement of the hazardous substance on, in, or at the facility, and the person establishes that the person has satisfied the requirements of (b)(1)(B) of this section and establishes that

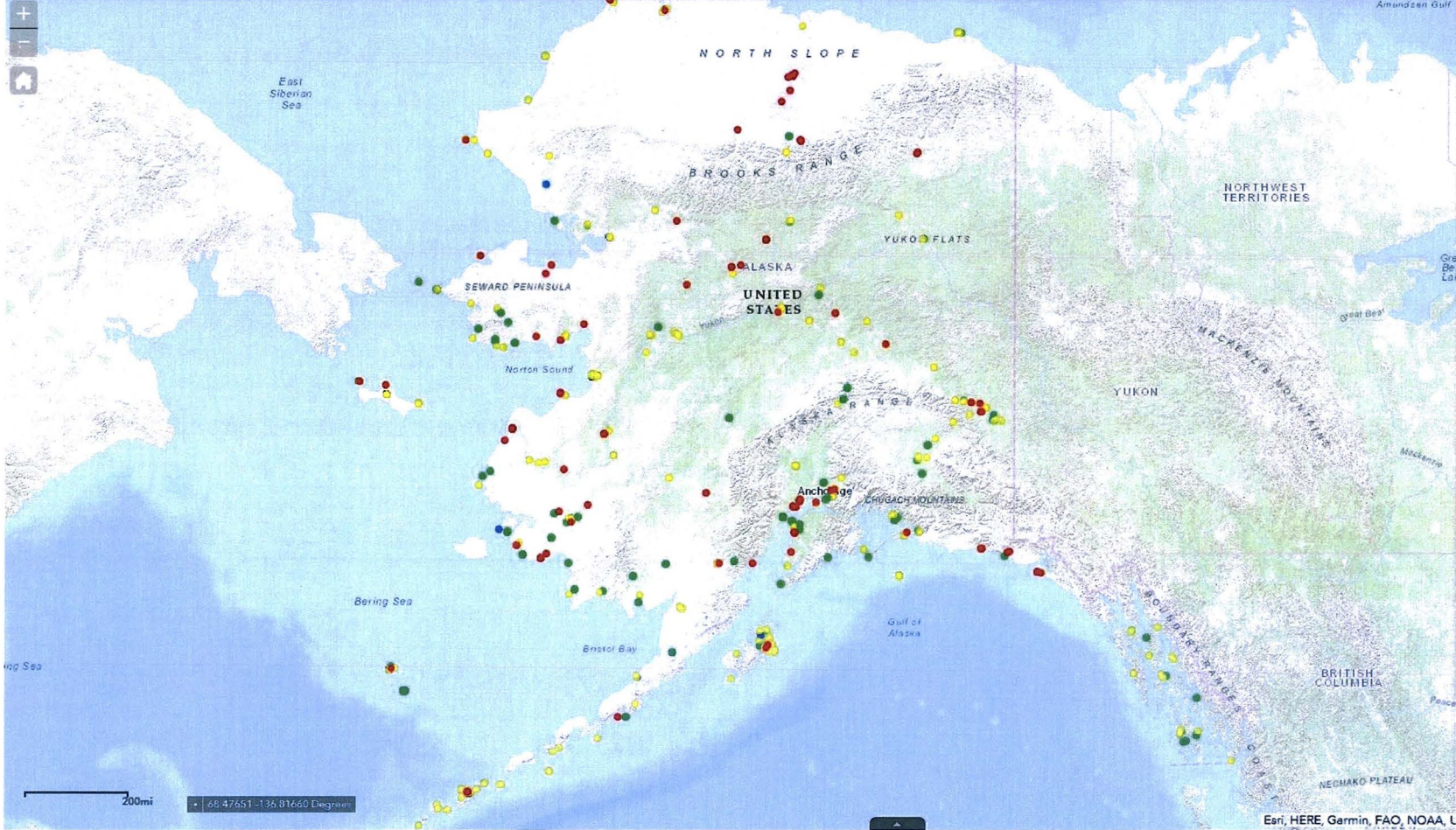
...

(3) the person is a corporation organized under 43 U.S.C. 1601 et seq. (Alaska Native Claims Settlement Act) that acquired the facility under those sections;

....

In other words, to be relieved from liability under AS 46.03.822(b) and (c), as currently provided in statute, a Native corporation must prove that (1) the release or threatened release occurred only because of an act of god or war, or the intentional or negligent act or omission of a third party; (2) if the release or threatened release occurred only because of the intentional or negligent act or omission of a third party, the corporation acted with care and took reasonable precautions to prevent the release or threatened release; and (3) that, if the release or threatened release occurred only because of the intentional or negligent act or omission of a third party, within a reasonable time after the act causing the release or threatened release, the corporation discovered the release or threatened release and began to clean up or contain it. The language in AS 46.03.822(c)(3) allows a Native corporation to use the defense in AS 46.03.822(b)(1)(B) related to the actions of a third party or an agent of a third party in contract with the Native corporation if the Native corporation received the land after the hazardous substance was placed on, in, or at a facility.

In summary, while both proposed sec. 46.03.822(n) and existing AS 46.03.822(c)(3) provide a waiver of liability for a Native corporation, the exemption in proposed sec. 43.03.822(n) waives liability in a much broader set of circumstances. I hope this helps to clarify the difference between sec. 46.03.822(n), proposed by SB 202, and the existing exemption under AS 46.03.822(b) and (c). If I may be of further assistance, please advise.



About

The Contaminated Lands Inventory map, created by the Bureau of Land Management (BLM), displays locations (as of July, 2017) to assist the public in identifying contaminated sites in the State of Alaska that have been conveyed to ANCSA corporations. The map has the capability to provide basic site information with links to conveyance information. For contaminated sites overseen by the State of Alaska Department of Environmental Conservation (ADEC), a link to the ADEC cleanup chronology report is also available. Zoom in to identify a site and click on the circle icon to get information about that site.

Sites within four databases (State of Alaska Department of Environmental Conservation-Contaminated Sites Program, U.S. Army Corps of Engineers Formerly Used Defense Sites, Federal Aviation Administration and U.S. Air Force) were reviewed by the BLM for an ANCSA corporation conveyance determination. The Orphan Sites within the inventory were derived from a series of meetings facilitated by the BLM in conjunction with ANCSA corporations and agency representatives whose databases were reviewed. Orphan sites are sites that have been conveyed to an ANCSA corporation and have been initially determined to not be in a current cleanup program.

- Orphan
- In Cleanup Program
- Informational
- Cleanup Complete with Institutional Controls
- Cleanup Complete

[Access the Web Feature Service \(WFS\) publication](#)

For additional information, please contact BLM Alaska:

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February 28, 2018

Honorable Members of the Alaska Legislature
Alaska State Capital Building
P.O. Box 110001
Juneau, AK 99801

Dear Alaska Legislature,

Tyonek Native Corporation (TNC) would like to express its support of SB 202, which would Amend AS 46.03.822 to clarify that Alaska Native Corporations that received contaminated sites as part of their ANCSA settlement lands are not legally liable for prior contamination that existed at the time of transfer.

TNC represents 916 Shareholders for the Native Village of Tyonek, Alaska created under the Alaska Native Claims Settlement Act of 1971.

Lifting the legal liability of our member corporations will allow us to begin to pursue clean-up funds that were not available to us previously. We wish to create well-paying highly skilled clean-up jobs in rural Alaska where jobs are desperately needed.

TNC again thanks you for your work on behalf of our State. If I can offer any assistance or answer any further questions, my direct line is 907.646.3104.

Respectfully,

Leo Barlow, CEO
Tyonek Native Corporation



SITNASUAK
NATIVE CORPORATION

March 7, 2018

The Honorable Senators Hoffman & Olson
The Honorable Representatives Millett, Tuck, Edgmon & Foster

Support for SB 202 & HB 367

Dear Senators and Representatives:

On behalf of the Sitnasuak Native Corporation (SNC), I am writing to express our support for SB 202 and HB 367. Both bills would Amend AS 46.03.822 to clarify Alaska Native Corporations that received contaminated sites as part of their Alaska Native Claims Settlement Act (ANCSA) settlement lands are not legally liable for prior contamination that existed at the time of transfer.

As an introduction, SNC is one of the Alaska Native corporations created in 1971 under ANCSA. SNC is proudly headquartered in Nome, Alaska, with operations in Nome, Anchorage, Wasilla, Fairbanks, California, Virginia Beach and Puerto Rico. Today, SNC is the largest of 16 village corporations in the Bering Straits region with over \$130 million in annual revenues. SNC is owned by and represents approximately 2,900 Alaska Native shareholders and entitled to 242,544.09 acres.

Clarifying and limiting the legal liability of our Alaska Native corporations will ensure our Alaskan entities and people can begin and pursue appropriate clean-up activities and federal Brownfield funds that were not available to us previously. We support preserving our lands and creating well-paying highly skilled clean-up jobs in rural Alaska where jobs are desperately needed.

Quyaana / thank you for your consideration. If you have any questions, please contact myself or Ukallaysaaq, Vice-President of Corporate Affairs, at (907) 387-1200.

Sincerely,

Roberta "Bobbi" Quintavell,
President & CEO

PO BOX 905
NOME, AK 99762

P: 907.387.1200



4341 B ST., STE. 402
ANCHORAGE, AK 99503

P: 907.929.7000



February 28, 2018

Honorable Members of the Alaska Legislature
Alaska State Capital Building
P.O. Box 110001
Juneau, AK 99801

Re: SB 202

Chugach Alaska Corporation (Chugach) is an Alaska Native Regional Corporation established pursuant to the Alaska Native Claims Settlement Act of 1971. As an Alaska Native corporation, we serve the interests of the Alaska Native people of the Chugach region and represent more than 2,500 shareholders. Our family of businesses employ more than 5,000 people, including 600 Alaskans, around the world. We believe that people matter most, from our shareholders to our customers to our employees. We strive to provide people opportunities for success, while promoting the cultural values of the Chugach people.

Chugach supports the SB 202, which would Amend AS 46.03.822 to clarify that Alaska Native Corporations that received contaminated sites as part of their ANCSA settlement lands are not legally liable for prior contamination that existed at the time of transfer.

Lifting the legal liability of our member corporations will allow us to begin to pursue clean-up funds that were not available to us previously. We wish to create well-paying highly skilled clean-up jobs in rural Alaska where jobs are desperately needed.

Chugach again thanks you for your work on behalf of our State. If I can offer any assistance or answer any further questions, feel free to reach out to me.

Sincerely,

Josie Hickel
President
Chugach Commercial Holdings



CALISTA CORPORATION
www.calistacorp.com

February 28, 2018

**Honorable Members of the Alaska Legislature
Alaska State Capital Building
P.O. Box 110001
Juneau, AK 99801**

Dear Alaska Legislature:

The Calista Corporation would like to express its support of SB 202, which would Amend AS 46.03.822 to clarify that Alaska Native Corporations that received contaminated sites as part of their ANCSA settlement lands are *not legally liable* for prior contamination that existed at the time of transfer.

Calista Corporation represents 25,000 A, B, C, and D class shareholders within our 56 villages created under the Alaska Native Claims Settlement Act of 1971. Lifting the current language of "strict liability" for our member corporations will allow us to pursue lawful and rightfully owed remediation funds that were not available prior to land transfer. The Red Devil mercury mine site is well known in the Calista Region, which is currently in the feasibility study stage by the BLM for site remediation and removal of hazardous substances. Calista and our associated villages with land selections co-located at this area, appreciates these clean-up efforts and wishes the same opportunity for remedial efforts for other Alaska Native Regional Corporations.

Additionally, we wish to create a skilled environmental remediation labor pool for our Environmental Services subsidiary, Brice Inc. for our shareholders who reside in rural Alaska where jobs are desperately needed.

Calista Corporation appreciates your work on behalf of our State. If I can offer any assistance or answer any further questions, the Calista Land and Natural Resource Department can be reached at 907-273-2800.

Respectfully,

Rosie Barr

Vice President of Land and Natural Resources

ALASKA NATIVE VILLAGE
CORPORATION ASSOCIATION



February 20, 2018

Honorable Members of the Alaska Legislature
Alaska State Capital Building
P.O. Box 110001
Juneau, AK 99801

Dear Alaska Legislature:

The Alaska Village Corporation Association (ANVCA) would like to express its support of SB 202, which would Amend AS 46.03.822 to clarify that Alaska Native Corporations that received contaminated sites as part of their ANCSA settlement lands are not legally liable for prior contamination that existed at the time of transfer.

We represent 176 Village Corporations created under the Alaska Native Claims Settlement Act of 1971. Since 2012, we have been attempting to bring resolution to the over 900 contaminated sites received by our members as part of the Alaska Native Claims Settlement Act of 1971.

ANVCA's mission is to promote Village Corporations' success and protection of Native lands. Lifting the legal liability of our member corporations will allow us to begin to pursue clean-up funds that were not available to us previously. We wish to create well-paying highly skilled clean-up jobs in rural Alaska where jobs are desperately needed.

ANVCA again thanks you for your work on behalf of our State. If I can offer any assistance or answer any further questions, my direct line is 907.841.7326.

Respectfully,

A handwritten signature in blue ink, appearing to read "Hallie Bissett". The signature is fluid and cursive, written over a light blue horizontal line.

Hallie L. Bissett
Executive Director

ANVCA is a 501 (c) 6 nonprofit organization.
Our federal tax id is: 26-1698277

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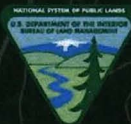
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U.S. Department of the Interior
Bureau of Land Management

Report to Congress

Hazardous Substance Contamination
of Alaska Native Claim Settlement Act Lands in Alaska

**2016 Update to the U.S. Department of the Interior
1998 Report to Congress**



For more Information

To request a copy, please contact:

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GLOSSARY OF ACRONYMS AND TERMS

<u>Acronym/Term</u>	<u>Definition</u>
Active (site)	ADEC term, further investigation, cleanup, or monitoring are needed; does not mean response actions are underway
ADEC	State of Alaska Department of Environmental Conservation
AFCEC	U.S. Air Force Civil Engineer Center
AFN	Alaska Federation of Natives
ANCSA	Alaska Native Claims Settlement Act
ANCSA lands	Lands conveyed to ANCs pursuant to ANCSA
ANC	Alaska Native Corporations
ANVCA	Alaska Native Village CEO Association
AST	Above ground storage tank
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act (Superfund Legislation) of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 (Superfund Legislation)
CIRI	Cook Inlet Region Incorporated
Cleanup	Actions taken to deal with a release, or threat of release, of a hazardous substance that could affect humans or the environment. The term "cleanup" is sometimes used interchangeably with the terms remedial action, removal action, response action, or corrective action.
CFR	Code of Federal Regulations
CLI	Contaminated Lands Inventory, the database of known contaminated sites on ANCSA lands
Contaminated site	A location where hazardous substances, including petroleum products, have been improperly disposed (ADEC)
DERP	Defense Environmental Restoration Program
DoD	Department of Defense
DOI	U.S. Department of the Interior
EPA	U.S. Environmental Protection Agency
FAA	Federal Aviation Administration
Feasibility Study (FS)	Feasibility study (FS) means a study undertaken by the lead agency to develop and evaluate options for remedial action. The FS emphasizes data analysis and is generally performed concurrently and in an interactive fashion with the remedial investigation (RI), using data gathered during the RI.
Flag	Term used in realty analysis; means conveyed status
FUDS	Formerly Used Defense Sites
FWS	U.S. Fish and Wildlife Service
Land status	Entity to which the BLM conveyed the property along with the data showing a contaminated site on that property
Land Use Controls (LUC)	Administrative or legal controls established to limit land use activities to prevent exposure to contaminants remaining at a site and/or to protect the integrity of a response action

Integrated Database	Land conveyance research performed by the BLM on ADEC contaminated sites database
NALEMP	USACE Native American Lands Environmental Mitigation Program
NG	National Guard
NPS	National Park Service
Orphan Site	Contaminated site on ANCSA lands that does not appear to be in a clean-up program
PA	Preliminary assessment (PA) under CERCLA means review of existing information and an off-site reconnaissance, if appropriate, to determine if a release may require additional investigation or action. A PA may include an on-site reconnaissance, if appropriate.
POL	Petroleum, oil, and lubricants
PRP	Potentially Responsible Party
RRS	Radio relay station
Regulatory status	Current understanding of the potentially responsible party, site contaminants, and any action taken to date to mitigate impacts
Release	Release means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
Remedial Action	Remedy or remedial action (RA) means those actions consistent with permanent remedy taken instead of, or in addition to, removal action in the event of a release or threatened release of a hazardous substance into the environment, to prevent or minimize the release of hazardous substances so that they do not migrate to cause substantial danger to present or future public health or welfare or the environment.
Remedial Investigation (RI)	An in-depth study designed to gather data needed to determine the nature and extent of contamination at a CERCLA site, establish site clean-up criteria, identify preliminary alternatives for remedial action, and support technical and cost analyses of alternatives; the remedial investigation is usually done with the feasibility study. Together they are usually referred to as the "RI/FS"
Remediation	Cleanup or other methods used to remove or contain a toxic spill or hazardous materials from a Superfund site
Removal Action	Remove or removal means the cleanup or removal of released hazardous substances from the environment
Respond/Response	Respond or response means remove, removal, remedy, or remedial action, including enforcement activities related thereto
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study

SI	Site inspection (SI) means an on-site investigation to determine whether there is a release or potential release and the nature of the associated threats. The purpose is to augment the data collected in the preliminary assessment and to generate, if necessary, sampling and other field data to determine if further action or investigation is appropriate.
Site	Either a geographical area represented by an installation (civil or military), or a specific release of a contaminant
SOC Working Group	Statement of Cooperation (SOC) partnership between state and Federal agencies sharing information and coordinating cleanup of contaminated sites in Alaska
State	State of Alaska
Stakeholder group	Stakeholder group, an ad hoc group the BLM convened to identify and verify sites to complete the preliminary inventory of contaminated sites on ANCSA lands
UIC	Ukpeagvik Inupiat Corporation
USACE	U.S. Army Corps of Engineers
USAF	U.S. Air Force
USDA	U.S. Department of Agriculture
USDHHS	U.S. Department of Health and Human Services
USDOI	U.S. Department of the Interior
USFS	U.S. Forest Service
UST	Underground storage tank

EXECUTIVE SUMMARY

The Bureau of Land Management (BLM) is pleased to provide this report, as requested by Congress in Public Law 113-235, about contaminated lands conveyed to Alaska Native corporations through the Alaska Native Claims Settlement Act (ANCSA). The Alaska Native community has expressed concerns over health, safety, and economic issues relating to the presence of hazardous materials or other forms of contamination on lands conveyed to them under ANCSA. The BLM commits to doing its part in addressing this important issue by assisting with land conveyance determinations and recommendations for addressing cleanup.

This report details the development and current status of the most comprehensive inventory to date of known contaminated sites on ANCSA lands. The report also provides an updated status on the steps that the BLM recommended in 1998 as well as additional recommendations to fully address cleanup of contaminated sites conveyed through ANCSA.

To prepare the inventory, the BLM started with information found in the Contaminated Sites Program Database, a publicly available source of information developed and managed by the Alaska Department of Environmental Conservation (ADEC) about contaminated lands in Alaska. Additional database information was obtained from the Federal Aviation Administration (FAA), U. S. Air Force (USAF), and the U.S. Army Corps of Engineers (USACE) Formerly Used Defense Sites (FUDS) program. The BLM worked closely with Federal, State of Alaska, and Alaska Native stakeholders to obtain additional information. The BLM attempted to eliminate duplication of information and identified gaps in knowledge for each contaminated site.

The end result is a contaminated lands inventory with current information about each site's land and regulatory status, including 1) the entity to which the BLM conveyed the property; 2) the precise coordinates, if known, for where the contaminated site is located; 3) the current understanding of the site's type and amount of contaminants, if known; and 4) any data gaps. Before it can be considered final, the inventory needs to be refined with further regulatory and site characteristics, when that information becomes known. Additionally, further outreach needs to be completed to those Alaska Native Corporations (ANCs) that did not respond during the BLM's facilitated meetings. Once finalized, the inventory will provide Alaska Native entities and the appropriate Federal and state regulators with a powerful tool to help address these contaminated sites.

Here is a summary of the current inventory findings, as of September 2015:

- According to the ADEC database, there were 920 contaminated sites conveyed to an ANCSA landowner. Of those, 328 sites have been cleaned up, 338 sites require additional cleanup, 242 sites have sufficient land use controls to prevent human exposure, and 12 sites have no confirmed release of contaminants.
- For the 338 sites that still require cleanup, the ADEC has identified, on a preliminary basis, the following entities as owners or operators of the sites prior to transfer:
 - Department of Defense: 48 percent (162 sites)
 - State of Alaska and state political subdivisions: 15percent (51 sites)
 - Private land owners: 12 percent (42 sites)
 - Unknown: 8 percent (26 sites)
 - ANCSA Corporations: 6 percent (20 sites)
 - Federal Aviation Administration: 5 percent (16 sites)

Non-ANCSA Native entities: 4 percent (14 sites)

Other Federal agencies¹: 2 percent (7 sites)

- In addition to reviewing the ADEC database, BLM reviewed three other databases (USAF, FAA, and USACE) and facilitated a stakeholder process to help determine which of the known contaminated sites on ANCSA lands were not in a clean-up program. After completion of the multi-meeting review, 94 sites do not appear to be in a clean-up program and are referred to as “orphan sites.” An additional 104 sites still require further verification and may be added later to this list of orphan sites.
- BLM had no known contaminated sites on land conveyed to ANCs. This is confirmed by data compiled by the ADEC.

Although the BLM conveyed and patented the majority of these lands, it did so while acting solely in a pass-through capacity as the Federal government’s “real estate agent.” Subsequent to transfer, the BLM has no statutory authority to compel or conduct cleanup of contaminated sites on ANCSA lands. Once lands are conveyed, full title transfers to the Alaska Native corporation, and there is no existing statutory authority for the BLM to execute or compel cleanup on conveyed lands. Only the ADEC and the Environmental Protection Agency (EPA) have authority to compel cleanup on ANCSA lands. To the extent that they can be identified, responsible parties are expected to conduct clean-up activities.

Before ADEC (or the EPA) can take any action to compel cleanup of the orphan sites, an actual release of a contaminant must first be verified at each site (e.g., type, quantity, and spread of one or more hazardous materials). Stakeholders could help ADEC by providing this important information, which could be added to the preliminary inventory for completion.

This report also provides an updated status on the six steps that the BLM recommended to Congress in 1998 for addressing the issue of contaminated sites conveyed through ANCSA. In short, the BLM formed a stakeholder group, conducted extensive outreach to Native corporations, produced a preliminary inventory of contaminated sites on ANCSA lands, and identified sites not covered in existing clean-up programs. The BLM lacks the authority to compel cleanup of contaminated sites on ANCSA lands subsequent to transfer, and therefore has not taken action on the remaining three steps identified in the 1998 report—applying EPA policies to ANCSA landowners; modifying policies, where needed, to address contaminants and structures that may affect public health and safety on ANCSA lands; and developing a process to train and enable local residents to better participate in clean-up efforts.

Finally, this report offers additional recommendations for next steps to those agencies in Alaska that have authority to address cleanup of contaminated lands that have been conveyed to ANCSA corporations. Recommended next steps for a clean-up plan are summarized, as follows:

1. **The ADEC should finalize the comprehensive inventory and implement a remedial action process.** In the State of Alaska, the ADEC retains the authority to ensure that the preliminary inventory is finalized into a comprehensive database that includes Potentially Responsible Party (PRP) determination. The ADEC also has authority (ADEC 18 AAC 75) to implement a remedial action process, which will require reviewing site-specific

¹ Other Federal agencies include the Department of the Interior, the National Oceanic and Atmospheric Administration, the Department of Health and Human Services, and the U.S. Postal Service.

documents, contacting landowners, and identifying the PRP (or PRPs). ADEC also provides specific training of local residents to enhance participation in future site work.

- 2. Establish a formal contaminated lands working group.** During the formation of the preliminary inventory, the BLM convened an ad hoc stakeholder group composed of Alaska Native corporations and Federal and State entities to identify and verify sites to complete the preliminary inventory. A more formal working group should be established by an agency that has existing authority to compel cleanup. This group would provide an on-going forum to share information and create a strategic plan to clean up the contaminated sites.
- 3. Initiate Site Clean-Up Process.** Once the ADEC documents the responsible parties for sites identified in the completed inventory, the final phase of work will be directed or conducted by the appropriate agency.

1. PURPOSE OF THE REPORT

Section 326 of Public Law 101-512 (November 1990) required the Secretary of the Interior to report to Congress on contaminated lands conveyed through the Alaska Native Claims Settlement Act (ANCSA), Public Law 92-203. Section 103 of Public Law 104-42 (November 1995) required the Secretary of the Interior to provide a more detailed report on contaminated lands prior to conveyance to Alaska Native Corporations (ANCs). In December 1998, the Bureau of Land Management (BLM) submitted a report to Congress on behalf of the Department of the Interior (DOI) entitled, *Report to Congress on Hazardous Substance Contamination of Alaska Native Claims Settlement Act Lands in Alaska* (hereinafter referred to as the “1998 report”). The report acknowledged the presence of approximately 650 contaminated sites on lands conveyed through ANCSA and offered six recommendations for next steps to address the issue. In December 2014 Congress provided further direction on contaminated lands to the BLM in the joint explanatory statement accompanying the Consolidated and Further Continuing Appropriations Act, 2015, Public Law 113-235. Specifically, Congress requested the following information:

- (1) A comprehensive inventory of contaminated sites conveyed through ANCSA, including sites identified subsequent to the 1998 report;
- (2) An updated status on the six recommendations listed in the 1998 report; and
- (3) A detailed plan on how the DOI intends to complete cleanup of each contaminated site.

This report provides an update on the BLM’s progress in compiling a comprehensive inventory of contaminated sites on lands conveyed through ANCSA. The report also updates the status of the recommendations listed in the 1998 report and provides further recommendations about how to clean up the contaminated sites.

2. BACKGROUND

As the Federal government’s “real estate agent,” the BLM has conveyed approximately 44 million acres of land to ANCs under the provisions of ANCSA. Some of the conveyed land contained facilities that had previously been developed and managed by various Federal agencies other than the DOI. Infrastructure at these facilities was typically needed to store and handle large quantities of fuel, generate power, dispose of solid waste, or discharge wastewater. The presence of such infrastructure created the potential for contaminants to be released into the environment, and historical releases have been documented at many such locations throughout Alaska. Under state regulation, when applicable, the person responsible for a known contaminant release is required to notify, investigate, contain, and clean up the affected area (ADEC 18 AAC 75.300).

The 1998 report indicated that as many as 653 potentially contaminated sites were present on conveyed ANCSA lands, based on existing site inventories compiled by various Federal and state agencies and sites identified through the ANCSA solicitation surveys. However, the 1998 report indicated that the number of potentially contaminated sites was likely smaller because some sites were probably duplicated on the various agencies’ inventories. The 1998 report also stated that at least 383 of those sites were part of active Federal clean-up programs.

The 1998 report defined an approach to addressing contaminated sites on conveyed lands consisting of the following six recommendations (further discussed in Section 4):

1. Establish a forum of ANCSA land owners and Federal, state, local, and tribal agencies for exchanging information, discussing issues, and setting priorities;
2. Compile a coordinated, comprehensive inventory of contaminated sites with input from all parties;
3. Apply Environmental Protection Agency (EPA) policies to ANCSA landowners, not to impose landowner liability to Federal transferees for contamination existing at the time of conveyance, where the landowner has not contributed to the contamination;
4. Analyze the data collected and report to Congress on sites not covered in existing programs and recommend whether further Federal programs or actions are needed;
5. Modify policies, where needed, to address contaminants and structures that may affect public health and safety on ANCSA lands; and
6. Continue to develop, under the leadership of the EPA and any other relevant agencies, a process to train and enable local residents to better participate in clean-up efforts.

This report (2016 report) outlines the development and current status of the Contaminated Lands Inventory (CLI), the most comprehensive inventory to date of known contaminated sites conveyed to ANCs under ANCSA. The report also describes the process by which the BLM involved stakeholder groups to provide, exchange, and verify information for the inventory. The resulting inventory contains current information about each site, including the clean-up status, land status, and regulatory status, if known. The BLM attempted to eliminate duplication of information from the various databases it used in the process, and identified gaps in knowledge for each contaminated site. Before the inventory can be considered final, it will need to be refined with further regulatory and site information, when that information becomes known. This 2016 report outlines steps for refining and finalizing the inventory, and provides key recommendations on necessary steps for the appropriate Federal and state regulators to compel the proper cleanup of contaminated lands that have been conveyed to ANCSA corporations.

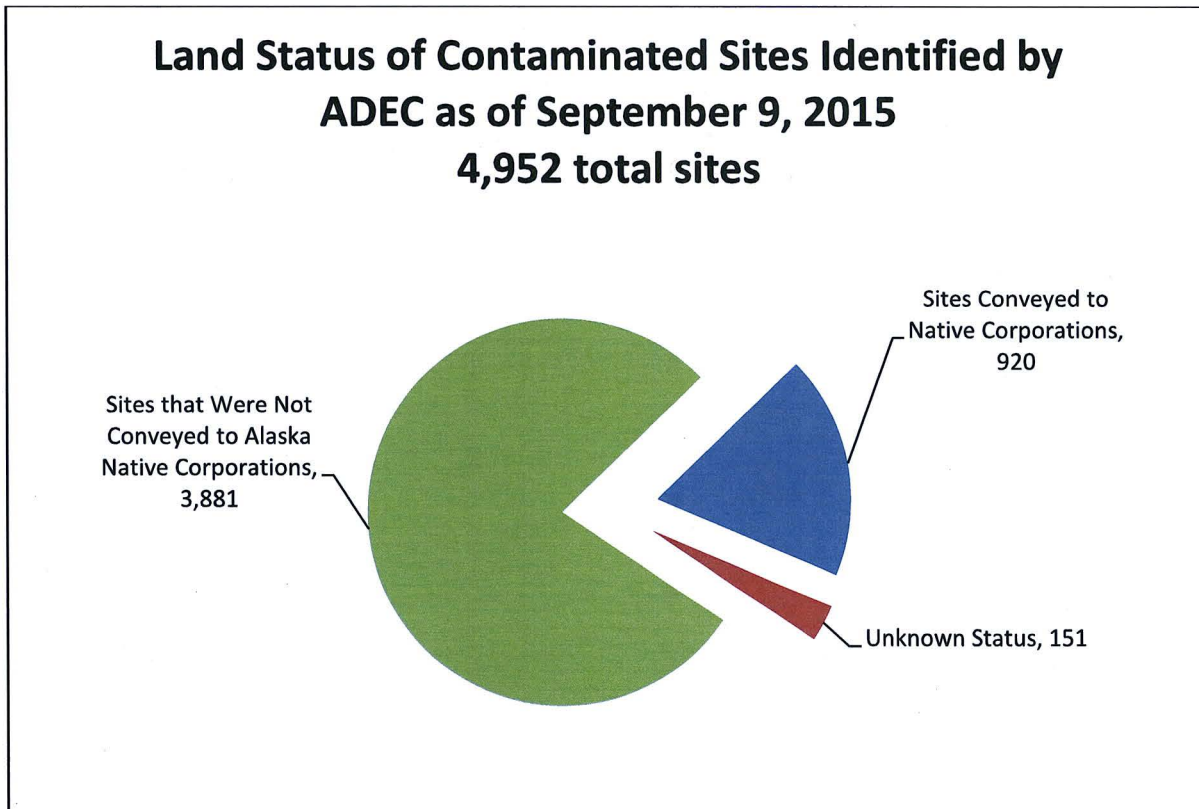
Land Conveyance under ANCSA and Responsibility for Contaminant Releases

Figure 1 below shows 4,952 contaminated sites identified by ADEC, and includes sites in all categories of cleanup status (i.e., complete, complete with institutional controls, informational, and active). As shown in Figure 1, there are 920 contaminated sites on lands conveyed to ANCSA corporations, according to data from the ADEC as of September, 2015. The majority of contaminated sites conveyed under ANCSA were located on lands and facilities administered by the DoD. The DoD, in this case, retains responsibility for addressing contamination resulting from releases on those sites that occurred during its administration of the lands and facilities. Accordingly, where available information indicates that conveyed lands contain contaminated sites that may require additional investigation and/or remedial work, it is the responsibility of state (ADEC) or Federal (EPA) regulators to identify the potentially responsible party (or parties) responsible for the contamination so that cleanup can be undertaken. The 151 ADEC sites in Figure 1 with Unknown Status did not have definitive locations to determine whether or not the site was conveyed to an ANCSA corporation. Further review of the site status reduced the number to 91 as described below in Figure 5.

The BLM's responsibility under ANCSA is limited to processing those real estate actions involved in transferring land ownership. There are no provisions in ANCSA that address responsibility for the past release of contaminants to the environment on lands that are subsequently conveyed under the Act.

Figure 1: Summary of the Alaska Department of Environmental Conservation (ADEC) inventory of contaminated sites – 920 on ANCSA conveyed lands as of September 9, 2015

The 151 ADEC sites in Figure 1 with Unknown Status did not have definitive locations to determine whether or not the sites were conveyed to an ANCSA corporation. Further review reduced the number to 91 as described below in Figure 5.



In general, under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), parties that may be held responsible for remediating contaminated sites include the following: 1) facility owners and operators at the time of release, 2) current owners and operators, 3) and parties that arranged for the disposal or transport of waste at or to the site. Although CERCLA does not apply to all contaminants, most state and other Federal environmental laws establish responsibility for remediation of contaminants in a manner similar to CERCLA. For lands conveyed under ANCSA, the BLM was not 1) a facility owner at the time of release, 2) was not a current owner or operator, 3) and did not arrange for the disposal or transport of waste at or to the site, hence, does not fall into any of the Potentially Responsible Party (PRP) categories identified in CERCLA.

Inventory Approach

Identifying contaminated sites that have been conveyed under ANCSA requires compiling a series of attributes that can be represented in two broad categories: land status and regulatory status. For this inventory, a site's **land status** is defined as the entity to which the BLM conveyed the property along with the data showing a contaminated site on that property. A site's **regulatory status** refers to the current understanding of the potentially responsible party, site contaminants, and any action taken to date to mitigate impacts. Obtaining definitive information about a given site's land status and regulatory status often requires a cooperative effort involving multiple Federal and state agencies as well as the village and regional ANCs.

Early in the development of the inventory, the BLM facilitated the formation of a stakeholder group that served as a forum to exchange information about contaminated sites on ANCSA lands, provide missing information, and discuss issues related to the inventory. The stakeholder group included the Alaska Native corporation landowners, the Alaska Native Village CEO Association (ANVCA), Federal agencies, tribal entities, the State of Alaska, and local agencies (refer to Appendix G).

To develop the preliminary Contaminated Lands Inventory, the BLM started with information found in the ADEC Contaminated Sites Program database, a publicly available source of information developed and managed by the ADEC about contaminated lands in Alaska. The BLM then added information from three other databases obtained from the U.S. Air Force (USAF), the U.S. Army Corps of Engineers (USACE), and the Federal Aviation Administration (FAA). The BLM supplemented the four databases with information gathered through informal dialogue with representatives of ANVCA and the ANCSA Regional Associations as well as other members of the stakeholder group. (See Table 2 for a summary of the information extracted from each of the four databases and Appendices A-E for a more detailed account of the information in each agency database and the information obtained from ANCSA Corporations.) The location of each of the contaminated sites was compared to the BLM land status to determine if the site appears to be on lands conveyed to an ANC. The stakeholder group also verified supplemental inventory data provided by the USAF, USACE, and FAA. After merging various databases to develop the initial inventory, the BLM identified duplication of reported sites and attempted to eliminate the duplicate information.

The early review process includes an analysis of information from ADEC, and the results are shown in Figures 1 through 3. Figure 1 (above) shows the land status of the 920 contaminated sites identified by the ADEC as having been conveyed to Native corporations. Figure 2 (below) shows the clean-up status for those 920 contaminated sites. Of the 338 sites that still require additional cleanup, Figure 3 (below) shows the PRP for the sites, as determined on a preliminary basis by ADEC.

The later review process includes an analysis of information from the four combined Federal and state databases (ADEC, USAF, USACE and FAA), and input provided by the stakeholder group during meetings held between April and September 2015. The results are shown in Figures 4 through 7 (below). Of the total 3,120 active sites (i.e., not yet cleaned up) in the four databases, Figure 5 (below) shows that 537 sites are on conveyed lands with a possible 91 additional sites, to be determined. The total of 537 sites includes those 338 sites that were identified through the review of the ADEC database as discussed above (and also shown in Figure 4, below). Figure 6 (below) shows that 94 sites do not appear to be in a clean-up program and are referred to as "orphan sites."

An additional 104 sites still require further verification and may be added later to this list of orphan sites. Figure 7 (below) shows preliminary PRP determinations of the 94 known orphan sites.

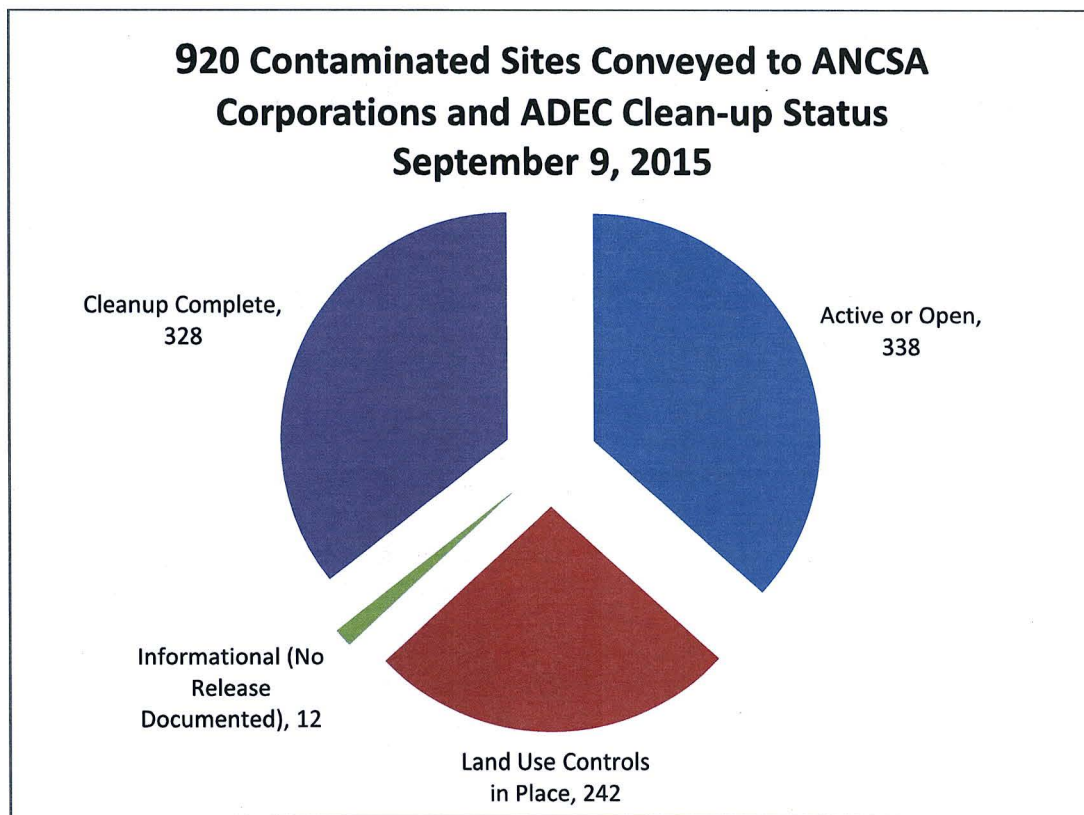
The preliminary inventory from the stakeholder group was distributed to all interested parties to begin the process of verification. The verification process includes identifying sites conveyed to an ANC that are not included within a current clean-up program. Workgroup meetings have been held with specific regional corporation areas, with invitations sent to respective regional corporations and all village corporations of the specified region. This dialogue has included the participants noted in Appendix G. One of the important outcomes of these meetings has been to correlate a spatial database with regulatory attributes and land status using standard Geographic Information System (GIS) technology to provide better information to all parties.

Part of the verification process includes determining whether or not there was an actual and quantifiable release of one or more contaminants at the site. Once this information is obtained, further review by appropriate state and Federal regulators is required to make a potentially responsible party designation. The ongoing verification process with the respective Federal and state agencies and ANCs is critical to ensure accuracy of the inventory.

If sites that are not within a current clean-up program are identified, the workgroup discussions shift to recommendations on steps to accomplish cleanup using existing authorities.

Figure 2: Current clean-up status of conveyed contaminated sites, as of September 9, 2015, from ADEC data

Figure 2 shows the clean-up status of the 920 contaminated sites that have records that show they were conveyed to an ANCSA corporation, based on ADEC data as of September 9, 2015.



3. CONTAMINATED LANDS INVENTORY

The Contaminated Lands Inventory was established primarily from ADEC's contaminated site database, which contains all known contaminated sites in Alaska, and supplemented by information provided by the supporting agencies and ANC's as described above. The integration of these databases and inventories requires further refining to determine: 1) whether there is duplication in reported contaminated sites within different agency inventories; 2) whether a given site is on land conveyed to an ANC (land status); and 3) whether the site is in an active clean-up program or has already been cleaned up (regulatory status).

Determining whether and how a given site should be included in the Contaminated Lands Inventory is a complicated and complex process. For example, a given site may have different history of use, changing land status, varying degrees of contaminant cleanup (or none at all), and unspecified, or potentially inaccurate, location information. An area's remoteness and the landowner's record-keeping are also factors in determining the degree of confidence in the data. Appendix F provides examples of the complexities involved.

Land Status

Establishing land status for any contaminated site in the inventory requires current information on all the property boundaries; the boundaries of any contaminated sites on that property; and the identity of the Federal agency managing the land when title was conveyed from Federal ownership. The level of certainty for spatial data in the preliminary inventory is currently insufficient to identify and confirm all contaminated sites on the conveyed lands. The spatial data that defined the boundaries of the conveyed lands were known with a high level of certainty at the time the land was conveyed. Changes that may have occurred to those boundaries or land ownership since then are not captured in the preliminary inventory. Further, preliminary review of spatial data compiled on individual contaminated site locations is neither complete nor always accurate. For example, with most sites, only one coordinate is available for a given site, and the aerial extent of the potentially contaminated area is not defined in the accessible databases. Therefore, a site-by-site document review is needed to determine actual site boundaries. In other cases, the spatial coordinate for the site falls within a body of water, suggesting the coordinate is inaccurate. The location of these sites must be researched by the agency that is responsible for managing its database.

Regulatory Status

Establishing the regulatory status of a contaminated site requires information addressing the following questions:

- Has a release of contaminants been confirmed?
- Is the extent of contamination and associated risks known?
- Who is the current landowner?
- Has a potentially responsible party (or parties) been identified?
- Has remedial action been taken, and if so, is it complete?
- Are there any restrictions on future land use?

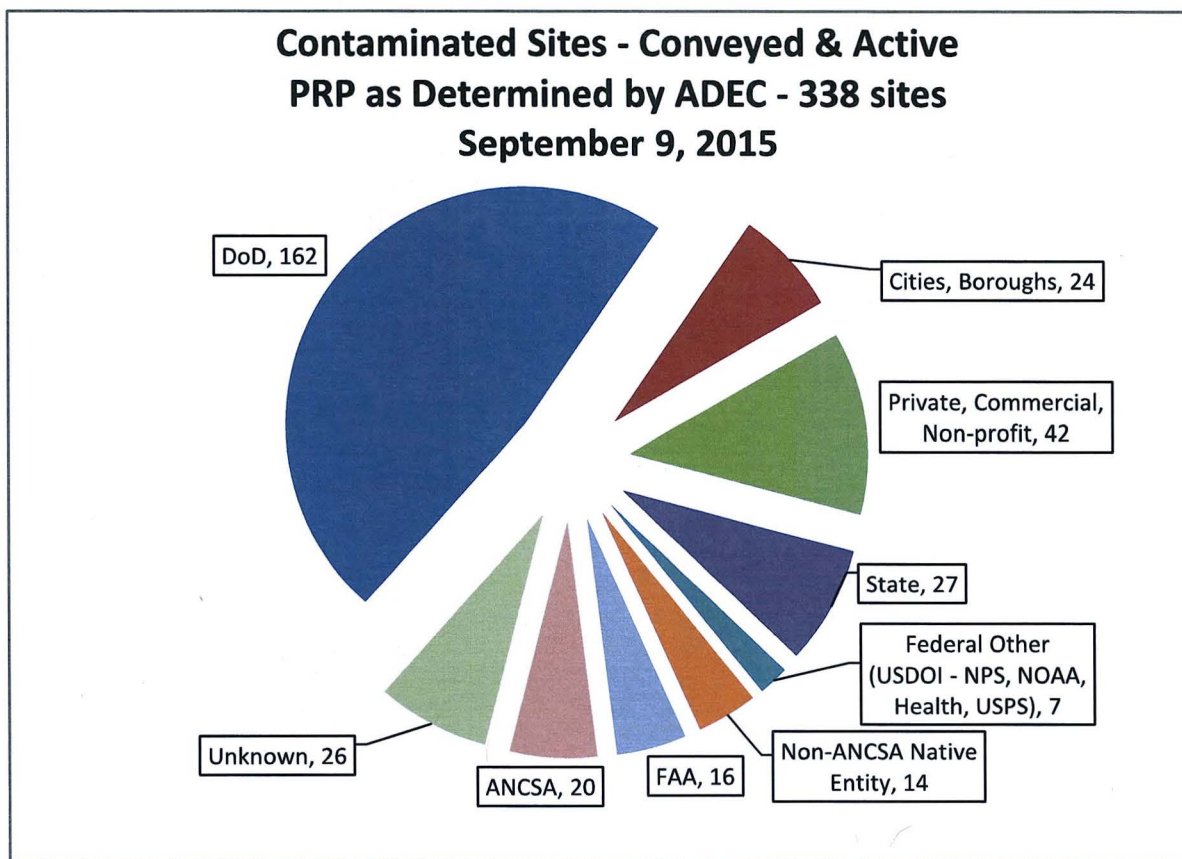
The data extracted from ADEC's database provides a link to the summary of past environmental site work and correspondence that indicates whether a site has achieved "cleanup complete" status. Frequently, ADEC's database also provides reports and work plans that describe confirmation of a

release, a summary of potential risks, and the action taken to achieve cleanup complete status, including any land use controls in place.

Of the 920 contaminated sites identified as being on ANSCA conveyed land, 338 sites remain “active or open,” meaning the contamination has not been fully addressed and the potential risk to human health or the environment has not been fully mitigated (Figure 2). Based on the information gathered at 12 sites, there were no confirmed releases of contaminants at these sites. Contaminant cleanup was completed for 328 sites, primarily by the DoD, with final approval authorized by the ADEC. Final approval means the sites pose no further threat to human health and safety, or to the environment. These are considered to be closed sites.

Land use controls are in place on 242 sites to prevent human exposure to residual contaminants; these sites are also considered to be closed by the ADEC. Land use controls are often used when it is not technically feasible or is cost prohibitive to complete remediation of contaminants to acceptable levels, in such a way that would allow for unrestricted future land use. In such cases, land use controls such as engineering controls or institutional controls may be put in place. Engineering controls are typically physical barriers (such as caps or fences) that prevent or limit access to a contaminated site. Institutional controls are administrative measures that limit how a site can be used, but do not physically prevent exposure. Typical examples include deed restrictions, agency-imposed land use restrictions, and posted warning signs.

Figure 3: Current summary of conveyed contaminated site status from ADEC Database as of September 9, 2015 (Note: potentially responsible party status is clearly stated as preliminary on the ADEC site.)



Current Inventory

A number of Federal agencies have physical facilities in Alaska, but only a few have developed a significant presence in remote areas of the State, where the majority of conveyed lands are located. The DoD, DOI, and USDA have the largest real property presence in Alaska. Because of the nature of its land use, the DoD operated at or administered land containing the largest number of contaminated sites that were formerly federally owned. While the FAA's historical footprint is much smaller, this agency has a large number of contaminated sites due to past and current navigation stations throughout the State of Alaska. Other departments, such as the Department of Transportation, the Department of Health and Human Services, the Department of Commerce, and the Department of Energy have maintained a limited presence in Alaska.

Although the BLM patented the majority of these lands, it did so while acting solely in a pass-through capacity as the Federal government's "real estate agent."

As described above under the Inventory Approach section, the current inventory has been developed based on the ADEC's Contaminated Sites Program database with supplemental data provided from other sources. Data was also obtained from the results of solicitation surveys that were sent to ANCSA corporations during the 1990s. Three Federal agencies, each responsible for managing contaminated site cleanups in Alaska, were key providers of additional information:

- Federal Aviation Administration (FAA);
- U.S. Army Corps of Engineers (USACE), Formerly Used Defense Sites (FUDS); and
- U.S. Air Force Civil Engineer Center (AFCEC).

The resulting GIS database comprises land attributes from the BLM's survey records and master title plats for the entire state. The location for each site acquired from the ADEC, FAA, USACE/FUDS, and AFCEC databases was downloaded onto the land record layers, and the following attributes were added:

- ANCSA region;
- Meridian, township, range, and section of site;
- Land status (is the site located on ANCSA conveyed lands);
- Conveyance document information;
- Conveyance action (special legislation and/or an agreement); and
- Date title passed to an ANC.

These attributes represent the minimum amount of information required to establish land conveyance status as of the date the title was transferred from Federal ownership.

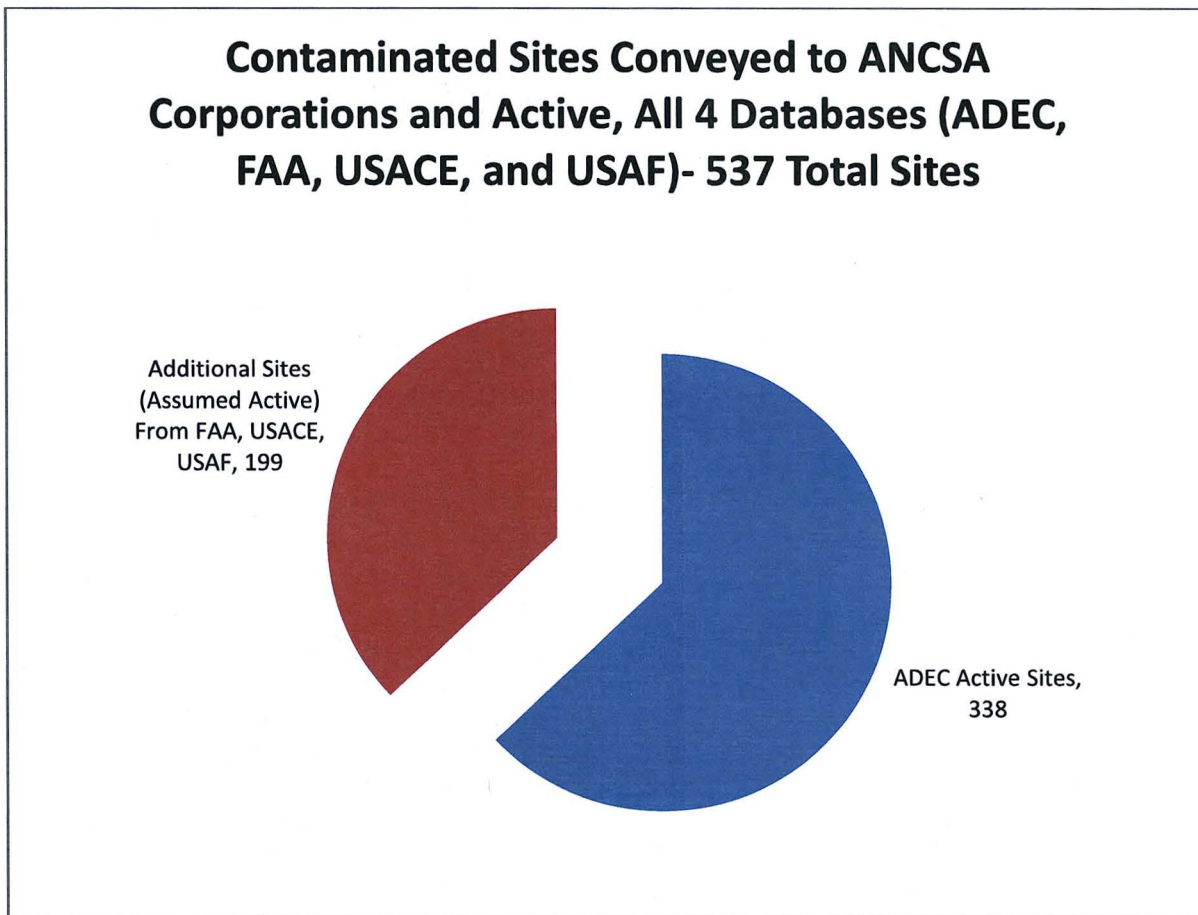
While the initial data review yielded an estimated 338 conveyed ADEC sites that are active, it also illustrated a number of data quality issues that must be addressed. Key data quality issues discovered as part of the initial assessment include:

- Inaccurate spatial data;
- Duplicate sites;
- Most sites are defined by a single point, preventing an estimate of the site dimensions and the effect on ownership boundaries;
- Inability to identify the potentially responsible party (parties) for all sites; and
- Outdated information on individual site regulatory status.

Of the 338 “open” ADEC sites, the ADEC has identified, on a preliminary basis, a potentially responsible party (or parties) for almost all sites, as follows by percentage (Figure 3 above):

- **Department of Defense:** 48% (162 sites)
- **State of Alaska and state political subdivisions:** 15% (51 sites)
- **Private land owners:** 12% (42 sites)
- **Unknown:** 8% (26 sites)
- **ANCSA Corporations:** 6% (20 sites)
- **Federal Aviation Administration:** 5% (16 sites)
- **Non-ANCSA Native entities:** 4% (14 sites)
- **Other Federal agencies²:** 2% (7 sites)

Figure 4: Total number of active contaminated sites conveyed to an ANCSA corporation identified from 4 State and Federal databases.



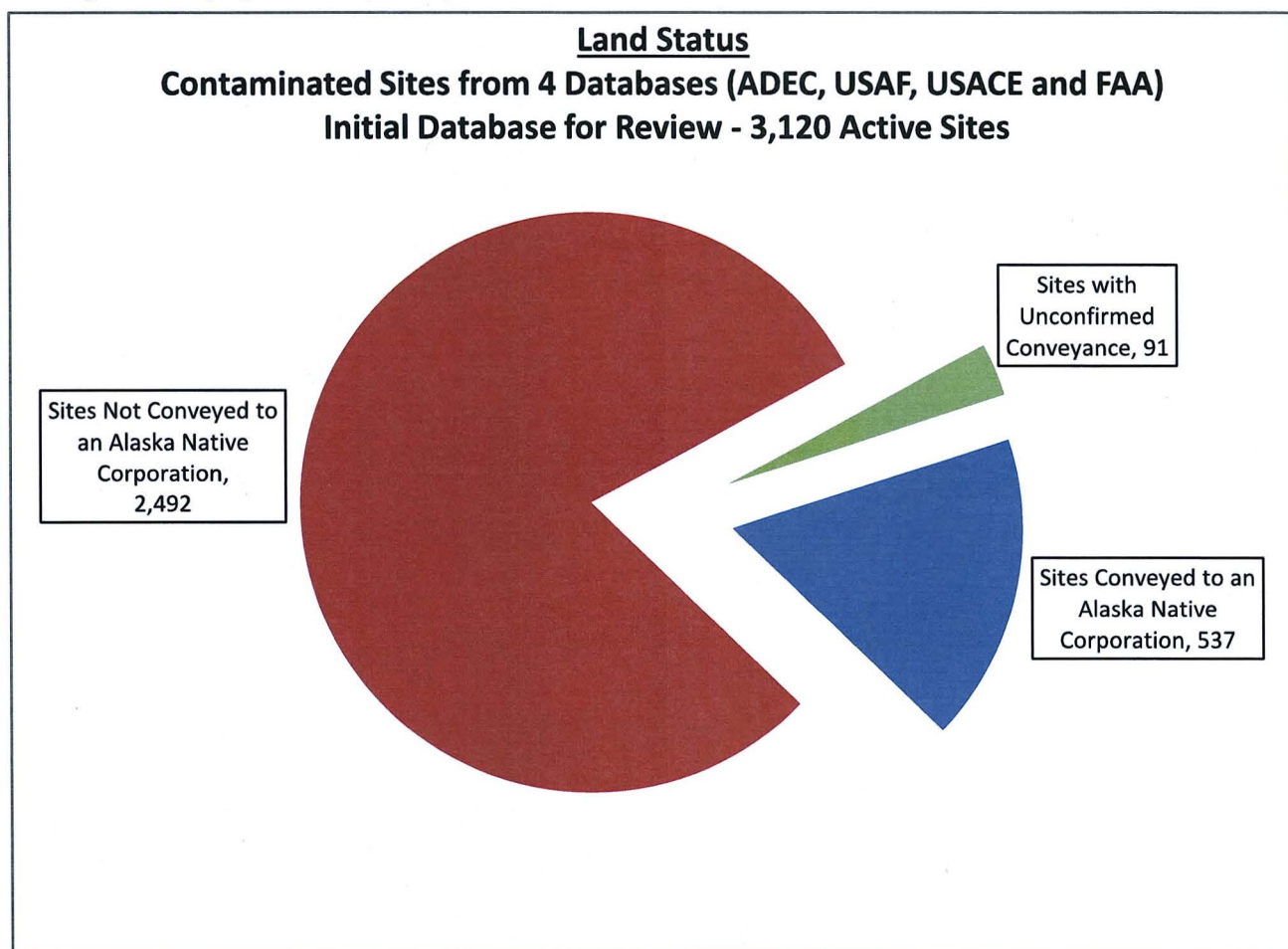
² Other Federal agencies include the Department of the Interior (DOI), the National Oceanic and Atmospheric Administration, the Department of Health and Human Services, and the U.S. Postal Service.

The BLM had no known contaminated sites on land conveyed to ANCs. This is confirmed by data compiled by the ADEC. However, the potentially responsible party for 26 sites (about 8% of the total) is as yet unknown.

Figure 3 above shows the potentially responsible party (PRP) that ADEC has identified for those sites that have been conveyed to an ANCSA corporation and are identified as “active” or “open” (i.e., have yet to be cleaned up) within the ADEC Contaminated Sites Program database as of September 9, 2015.

Figure 5: Total number of contaminated sites identified from 4 State and Federal databases, as determined by the stakeholder group process (meetings April through September 2015), including all Alaska Native corporation areas.

Of the total 3,120 active sites (i.e., not yet cleaned up), 537 sites are on conveyed lands with a possible 91 additional sites, to be determined, for a total of 628 possible sites, at this stage in the review process. (September 9, 2015)



Facilitated Meetings – Stakeholder Group

As described above under the Inventory Approach section, the initial inventory was developed based on the ADEC’s Contaminated Sites Program database with supplemental agency and ANCSA

submitted data. To receive input and feedback about the initial database of contaminated sites on ANCSA lands, the BLM facilitated nine meetings between April 27 and September 1, 2015 (Table 1 below and Appendix G). Invitation letters were sent to all village and regional Native corporations. Stakeholder group participants included representatives from the ADEC, USAF, FAA, USACE, U.S. Navy, U.S. Fish and Wildlife Service, and representatives from both regional and village Native corporations (Appendix G). Due to the time of year, only 24% of all Alaska Native Corporations (ANC) attended the meetings. The BLM continued outreach with ANC representatives including one-on-one communication with the goal to gather information from those ANCs that had not already participated. In the future, periodic updates will be necessary to verify newly submitted sites, incorporate changing site status, and identify overall progress (Status of 1998 Report Recommendations, Recommendation 4).

Orphan Site Database

One of the primary goals of the stakeholder group was to help determine which of the known contaminated sites on ANCSA lands were not in a clean-up program. A site is considered to be an “orphan” site if it meets the following criteria: 1) contamination was present at the time of conveyance, and 2) the site is not currently within a clean-up program. As shown in Figure 6 (below), 94 sites fit these criteria on lands conveyed to an Alaska Native Corporation (ANC). Collectively, the information about these 94 sites is contained in an Orphan Site Database, which is contained within the overall Contaminated Lands Inventory database for ANCSA lands. An additional 104 sites (Figure 6) still require further verification and may be added later to the Orphan Site Database. Most of the sites needing further verification require ANC review to ensure that a USACE “no further action finding” is warranted. USACE performed site assessments and determined that there was no contamination. Oftentimes, these site investigations were performed decades ago and were limited in scope.

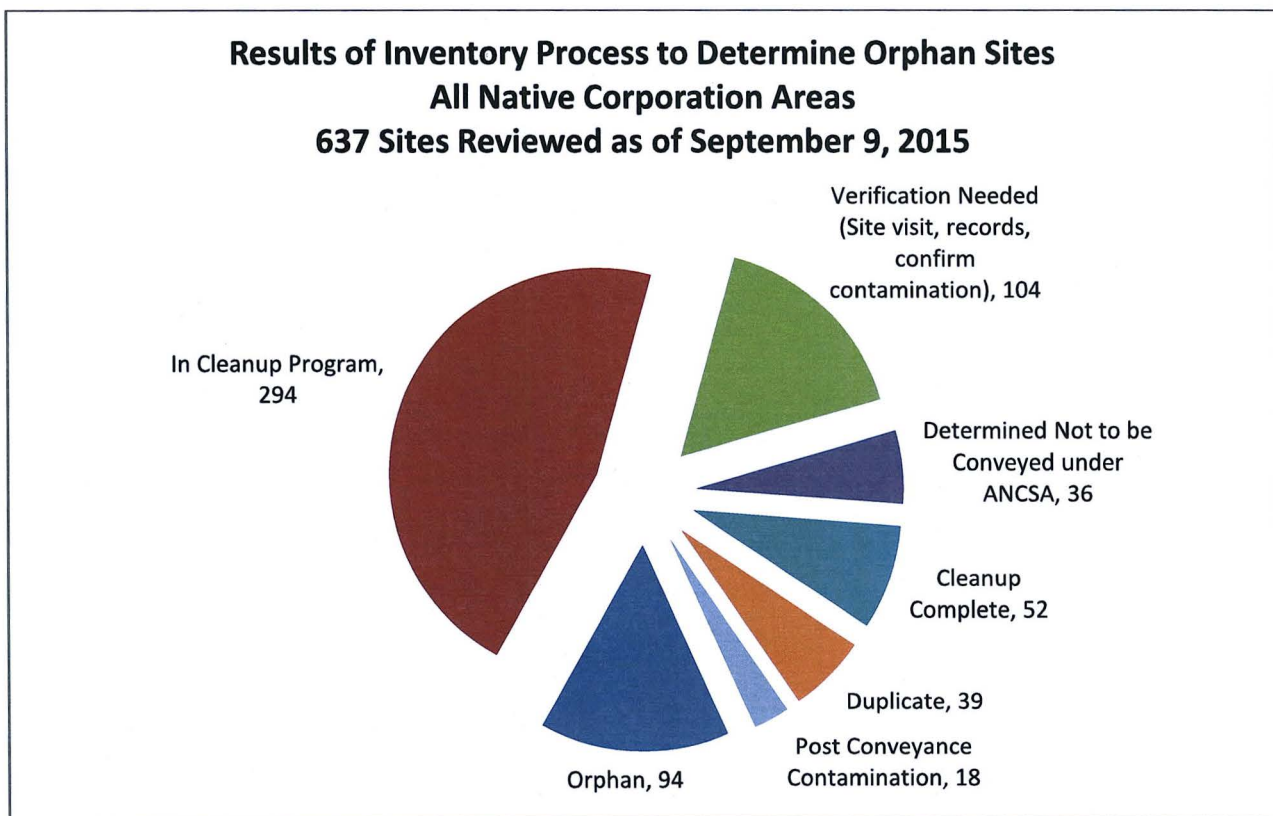
Table 1: Summary of BLM Facilitated Meetings Showing Regional Corporation Areas³

Regional Corporation	Date
Ahtna	Complete (4/29/15)
Chugach	Complete (4/29/15)
Koniag	Complete (4/29/15)
Arctic Slope	Complete (6/9/15)
Bristol Bay	Complete (6/9/15)
NANA	Complete (6/11/15)
Sealaska	Complete (7/21/15)
Bering Straits	Complete (7/21/15)
Calista	Complete (7/21/15)
CIRI	Complete (8/25/15)
Doyon	Complete (8/25/15)
Aleut	Complete (9/1/15)

³ Geographical areas represented by the regional corporation include all village corporations within the regional boundary. The BLM sent invitational letters to all regional and village Native corporations.

In order to coordinate further review of the contaminated sites, the BLM reached out to the Statement of Cooperation (SOC) partnership between state and Federal agencies in Alaska, known as the SOC Working Group⁴. Members of this group collaborate and share information that assists in evaluating pollution impacts to human health and the environment in Alaska, and in preventing and cleaning up contamination. During a meeting on September 14, 2015, the Working Group discussed the future “home” of the preliminary Contaminated Lands Inventory (CLI) as well as the information contained within the database about orphan sites. Participants initially agreed that the ADEC database is the logical location for adding the Orphan Site database. Attributes of the ADEC database can easily be amended to identify orphan sites. Orphan sites with unverified contamination could easily be tagged as “orphan informational.” Other suggestions included asking the BLM to host the overall CLI database due to the BLM’s involvement with land conveyance research on new sites and sites with changed locations. Due to the high interest by Congress and the Native entities, it has been determined in the interim that BLM will house the Contaminated Lands Inventory while a permanent solution is being pursued.

Figure 6: Inventory Results (Note: Difference in Sites Reviewed Number (637) below and total Conveyed and Unknown from Figure 5 (628) is attributed to nine new sites brought forth by Native corporations.) (September 9, 2015)



⁴ SOC Working Group members, by charter, include representatives in Alaska from the DoD, FAA, ADEC, EPA, Alaska National Guard, USFS, US Coast Guard, and the Denali Commission

Figures 5 and 6 (above) are derived from information obtained in the meetings with the stakeholder group that BLM facilitated between April and September, 2015. In addition to the 338 sites identified through the ADEC database, shown in Figures 2 and 3 (above), the group reviewed potentially contaminated sites identified in three other databases obtained from the FAA, the U. S. Air Force (USAF), and the U.S. Army Corps of Engineers (USACE) Formerly Used Defense Sites (FUDS) program. An additional 199 sites were identified from these three additional databases to obtain the total of 537 sites. From all 4 databases, a total of 3,120 “active” (i.e., not yet cleaned up) contaminated sites were reviewed for conveyance to an ANCSA corporation. Of this total, Figure 5 (above) shows that 537 of the sites were conveyed to an Alaska Native Corporation (ANC) and 91 sites still require conveyance determination due to poor locational data. The total possible number of contaminated sites conveyed to an ANC could be as high as 628. During the forum process, nine additional sites were submitted to bring the total of sites to 637 with results explained in Figure 6 (above).

Sites reviewed during the facilitated meetings were placed into seven categories (Figure 6 above):

- Orphan (site meets criteria of being conveyed to an ANCSA corporation and is not within a cleanup program);
- In Cleanup Program (site is currently being cleaned up within an active cleanup program);
- Verification Needed (further review by the ANC is needed to verify contamination exists);
- Determined Not to be Conveyed under ANCSA after stakeholder review (further consideration by ANCs is no longer necessary for these sites);
- Cleanup Complete (there is no further contamination present);
- Duplicate (site was found to be a duplicate among the 4 different databases); and
- Post Conveyance Contamination (information was available from on-line reports explicitly stating that the contamination release occurred after conveyance).

4. STATUS OF 1998 REPORT RECOMMENDATIONS

The 1998 report offered six recommendations for next steps to address the issue of contaminated sites on lands conveyed through ANCSA. Here is an update on the status of the six recommendations. In short, a preliminary Contaminated Lands Inventory (CLI) database was established along with a stakeholder group to provide information into and feedback about the database contents. The BLM lacks the statutory authority to take action on the remaining recommendations. However, the CLI database will provide a useful tool to those agencies (ADEC and EPA) that can compel cleanup of contaminated lands that have been conveyed to ANCSA corporations.

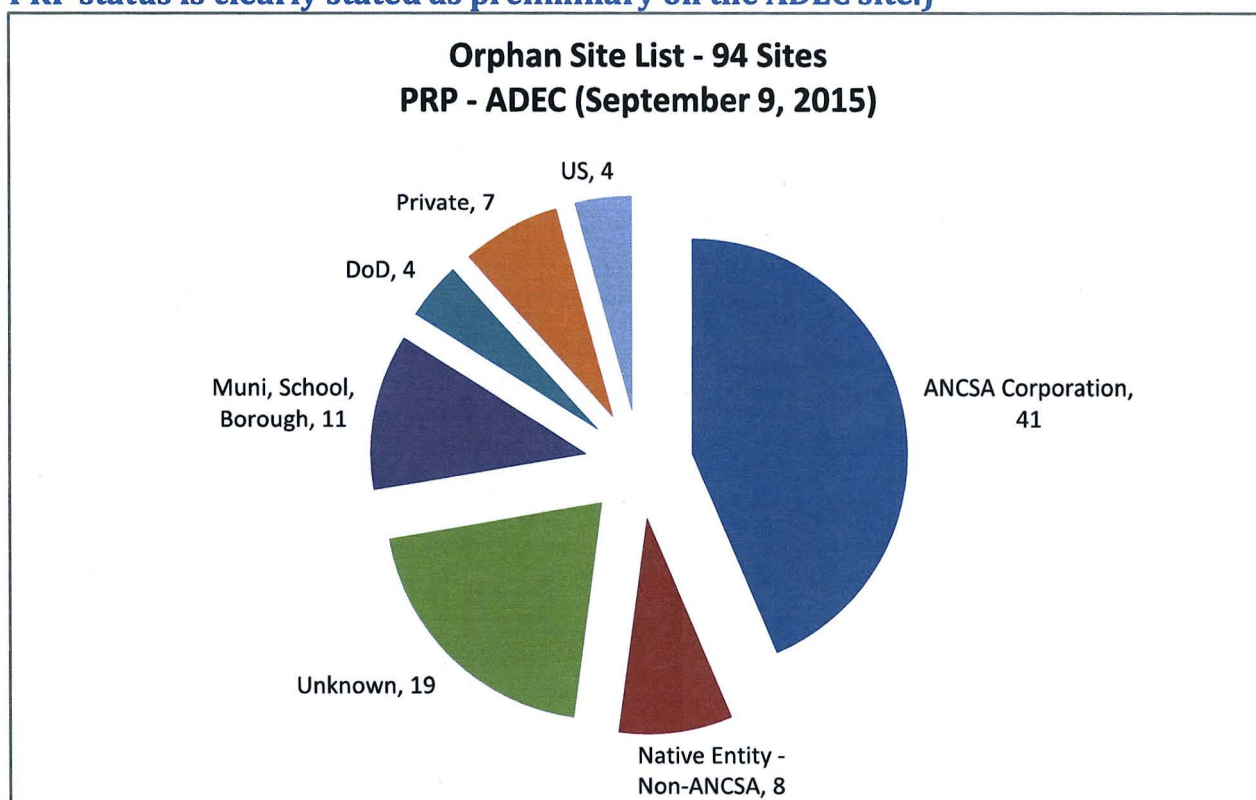
Recommendation 1. Establish a forum of ANCSA land owners and Federal, state, local, and Tribal agencies for exchanging information, discussing issues, and setting priorities.

The BLM facilitated formation of a stakeholder group (Appendix G) that serves as a forum to exchange information, discuss issues, and set priorities. The group includes the Alaska Native corporation landowners, the Alaska Native Village CEO Association, Federal agencies, tribal entities, the State of Alaska, and local agencies.

Recommendation 2. *Compile a coordinated, comprehensive inventory of contaminated sites with input from all parties.*

The BLM has established a preliminary inventory of contaminated sites into a centralized geospatial database, drawing on four existing datasets from various state and Federal agencies. In order to solicit input for the database, the BLM completed meetings with corporations within each of the ANCSA regions. As stated above, the future “home” of the preliminary Contaminated Lands Inventory was discussed by stakeholders, and the ADEC and BLM were offered as entities to maintain part or all of the associated database. Due to the high interest by Congress and the Native entities, it has been determined in the interim that the BLM will house the database while a permanent solution is being pursued.

Figure 7: Orphan Site List - Potentially Responsible Party, According to the Alaska Department of Environmental Conservation, September 9, 2015 (Note: PRP status is clearly stated as preliminary on the ADEC site.)



Recommendation 3. *Apply Environmental Protection Agency (EPA) policies to ANCSA landowners, not to impose landowner liability to Federal transferees for contamination existing at the time of conveyance, where the landowner has not contributed to the contamination.*

The BLM does not have the authority to provide liability relief under CERCLA for potentially responsible parties at sites not under the BLM’s jurisdiction, custody, or control; that authority rests with EPA or Federal courts in accordance with the provisions of Section 107 of CERCLA, 42 U.S.C. 9607.

The Statement of Cooperation (SOC) partnership between state and Federal agencies in Alaska, known as the Working Group, is one forum that could help in the process of identifying potentially responsible parties for those sites where previously contaminated lands were conveyed under ANCSA. The Working Group members collaborate and share information that assists in evaluating pollution impacts to human health and the environment in Alaska, and in preventing and cleaning up contamination. As such, this group could review the preliminary CLI database and ADEC-provided information, and then make recommendations to those agencies, such as the EPA and the ADEC, who have the statutory authority to compel cleanup on ANCSA lands.

Recommendation 4. Analyze the data collected and report to Congress on sites not covered in existing programs and recommend whether further Federal programs or actions are needed.

The process of coordinating with stakeholders revealed that 94 contaminated sites are not currently in a clean-up program. Using its statutory authority, ADEC has initially determined a potentially responsible party for all but 19 of these orphan sites. Further verification is also needed for 104 sites requiring input from the ANCs as to whether contamination exists at the sites.

One of the first steps to considering a clean-up program is to verify whether or not there was a quantifiable release of a contaminant at the site. The stakeholder group could provide important information to the EPA or the ADEC to complete this verification process, give site-specific information about the “orphan sites,” and determine the need for inclusion in Federal programs, budgetary requests, or further action.

Recommendation 5. Modify policies, where needed, to address contaminants and structures that may affect public health and safety on ANCSA lands.

In Alaska, the ADEC and the EPA are the only agencies with the authority to compel clean-up action on ANCSA owned lands or lands not managed by the DOI or the U.S. Department of Agriculture (USDA). The Working Group could review the preliminary CLI database and make recommendations on whether policy changes are needed.

Recommendation 6. Continue to develop, under the leadership of the EPA and any other relevant agencies, a process to train and enable local residents to better participate in clean-up efforts.

ADEC has been instrumental in providing ANCs and the overall public information that is needed for recognizing, reporting, and clean-up methodology related to contaminated sites. Their website, for example, contains detailed information about how local residents can recognize and report contamination.

The EPA’s Indian Environmental General Assistance Program (GAP) resources have made it possible for most tribes to establish baseline technical, administrative, and legal capacity for tribal environmental protection programs that respond to environmental issues affecting tribal lands.

5. RECOMMENDATIONS FOR A CLEAN-UP PLAN

The BLM's creation of the Contaminated Lands Inventory (CLI) is the first step in achieving a comprehensive inventory of contaminated sites on lands conveyed to ANCs. The data compiled reflects the extensive coordination by the BLM to establish a dialogue among all stakeholders (USAF, USACE, ADEC, the FAA, ANCs, the ANVCA, and the ANCSA Regional Association).

The overall CLI database includes the Orphan Site Database that contains information about the 94 sites (Figure 6, above) that appear not to be in a clean-up program. An additional 104 sites (Figure 6, above) still require further verification and may be added later to the Orphan Site Database.

Now that the CLI has been completed and the Orphan Site Database has been developed, it is critical that those agencies in Alaska with regulatory authority over or responsibility for cleanup of contaminated sites on ANCSA lands, utilize the data to prioritize action in the State. The following recommendations will aid that process.

A. The ADEC Should Finalize the Orphan Site Database and Implement a Remedial Action Process

There are a series of additional steps that must be taken to set out a process to clean up the contaminated sites on ANCSA lands. In the State of Alaska, the ADEC retains the authority (ADEC 18 AAC 75) to take the following steps that will ensure that the preliminary inventory is finalized and develop a comprehensive database. Therefore, the ADEC should:

- Identify those sites that require remedial action, and
- Identify those sites that have been reported as remediated and determine whether Land Use Controls were part of the final action, and whether those administrative measures are consistent with projected future land use.

In Alaska, the ADEC also has authority to implement a remedial action process, which will require:

- Reviewing site-specific documents to establish current regulatory status and obtain spatial data needed to locate site boundaries. Key questions to be addressed as part of document review include but are not limited to:
 - Was the contaminated site part of a larger complex or facility, and if so, what is the land and regulatory status of that complex or facility?
 - Is the complex or facility formerly or currently managed by only one Federal agency or is there mixed public and private ownership?
 - For those facilities with mixed ownership, which owner is responsible for addressing risk associated with contaminated sites?
 - For any contaminated site that has been conveyed, has there been any post-conveyance site activity that may have contributed to the existing contamination?
- Contacting landowners listed for each site in the current inventory and identifying the potentially responsible party (or parties) for that site;
- Identifying specific types of training that can reasonably be provided to local residents who will enhance participation in future site work.

B. Establish a Formal Contaminated Lands Working Group

During this process, the BLM convened an ad hoc stakeholder group (Appendix G) to identify and verify sites to complete the preliminary inventory. A more formal working group should be established to provide an on-going forum to share information and create a strategic plan to clean up the contaminated sites. The formalized working group should be chaired by those agencies that have existing authority to compel cleanup of contaminated sites on ANCSA corporation land in Alaska — such as the ADEC and the EPA—and involve all of the appropriate Federal and state regulatory agencies and ANCs.

The Contaminated Lands Working Group may be established with a Memorandum of Understanding (MOU) among the Federal agencies that have clean-up authority or responsibilities, appropriate state agencies, and the ANCs. The MOU should establish roles and responsibilities for each Federal and state agency and affected Alaska Native Corporations, a process for public input into further identification, and cleanup of contaminated sites. The actual cleanup of a particular site can then be addressed in agreements between the state or Federal regulator and the responsible party.

Another option for formation of the Contaminated Lands Working Group would be to establish a Federal-State cooperation body similar to the Alaska Land Use Council to oversee verification and cleanup of identified contaminated sites.

Once established, the first priority of the Contaminated Lands Working Group should be to continue verification of the “orphan sites”—contaminated sites conveyed to ANCSA corporations that are currently not within a cleanup program—and to expand the ongoing dialogue by:

- Continuing a regular forum for discussion and data sharing that includes state and Federal agencies and ANCs;
- Notifying environmental regulatory agencies (both state and Federal) of the inventory development process and invite their input;
- Identifying specific data needs for each cooperating agency;
- Notifying the potentially responsible party of the need for additional data;
- Establishing a process for compiling additional information, updating the inventory, and distributing the final inventory to interested parties; and
- Tracking completion of site cleanup.

C. Initiate Site Clean-Up Process

Once the ADEC has documented the responsible parties for sites identified in the completed inventory, the final phase of work will be directed by the appropriate regulatory agency. Within Alaska, this authority lies primarily with the ADEC for sites not on federally-managed lands. If established, the Contaminated Lands Working Group should work with affected Federal agencies and ANC partners to develop a priority list for cleanup and help track the developed cleanup plan to ensure that work is completed in a timely manner.

ACKNOWLEDGMENT

The following entities provided information used in the development of this report:

- Alaska Department of Environmental Conservation
- Alaska Native Corporations (included in Appendix G)
- Alaska Native Village CEO Association
- ANCSA Regional Association
- Federal Aviation Administration, Anchorage, Alaska
- U.S. Air Force Civil Engineer Center, Joint Base Elmendorf-Richardson, Alaska
- U.S. Army Corps of Engineers, Joint Base Elmendorf-Richardson, Alaska

Table 2: 2014 Inventory - Summary of Contaminated Sites

Compiled Contaminated Lands Inventory Database. Table 2 shows the sites from the 4 databases that were reviewed for land status during 2014-2015. Duplicate Sites are unaccounted for.

Regulatory Status ¹	Land Status		
	On ANCSA Lands	Not on ANCSA Lands	Unknown ⁸
ADEC - Cleanup complete ²	328		
ADEC - Cleanup complete with LUCs ³	242		
ADEC - Informational ⁴	12		
ADEC - Active and not confirmed as part of a current cleanup program ⁵	338		
ADEC Subtotal	920	3,881	151
FAA - Active and part of a current cleanup program ⁶	38		
FAA Subtotal	38	229	
U.S. Army Corps of Engineers (USACE) Formerly Used Defense Sites (FUDS) Active and part of a current cleanup program (or complete)	40		8
U.S. Army Corps of Engineers (FUDS) Process verification required (USACE) ⁷	80		14
USACE Subtotal	120	500	22
U.S. Air Force –Cleanup complete	5		
U.S. Air Force – Active and part of a cleanup program	6		
U.S. Air Force Subtotal	11	541	
Total	1,089	5,151	173

Notes:

1. Regulatory Status terms used by the ADEC.
2. Cleanup complete is the term applied by the ADEC to a site “when efforts to reduce hazardous substance contamination have achieved the most stringent levels established in state regulation, or the possibility of human exposure to any residual contamination is highly unlikely” (definition excerpted from the ADEC Contaminated Sites website, December 2014).
3. LUCs – Land Use Controls are administrative or legal controls established to limit land use activities to prevent exposure to contaminants remaining at a site and/or to protect the integrity of a response action.
4. Informational – A release of contaminants has not been verified.
5. Per Figure 3 above, as of September 9, 2015, preliminary PRP determination shows the United States (primarily the DoD and FAA) as potentially responsible for cleanup at 185 sites. Further review may show that the responsibility for cleanup may either 1) span multiple departments and agencies, 2) include non-Federal potentially responsible parties, or 3) show the U.S. is not a PRP.
6. All sites reviewed are in a clean-up program including locations with ‘Complete’ status due to monitoring.
7. USACE sites requiring further verification typically had a Preliminary Assessment (PA) completed decades ago but no hazards or other issues warranted site work. Further verification with the ANC is needed to document if no contamination is present.
8. Due to inexact legal descriptions or complex land status, these sites have not received an initial determination that they are on land conveyed to an ANC.

APPENDICES

APPENDIX A – Orphan Site Database (September 9, 2015)

Table 3 below is extracted from the inventory performed by the BLM. This base information was obtained from the State of Alaska Department of Environmental Conservation's (ADEC) Contaminated Sites Program database with additional sites brought to the BLM's attention through the facilitated meetings held during 2015. One site is from the U.S. Army Corp of Engineers Formerly Used Defense Sites database. The location of each of these sites was compared to the BLM lands status to determine if the site appears to be on lands conveyed to an ANC. The "FlagNotes" column records the title document that was issued to the ANC.

The BLM only maintains records of first generation land transfers from the U.S. as well as acquisitions by the U.S. When the land was first transferred from Federal ownership to state or private ownership, subsequent land transfers are recorded with the State of Alaska's Recorders Office. If the lands have subsequently been transferred from an ANC to another party, then the possibility exists that there could be multiple potentially responsible parties. Pertinent to this is the date of contamination relative to the date of title transfer.

With the assistance of the regulatory agency involved, in this case the ADEC, each of these 94 sites will need further investigation to determine if they are in an existing clean-up program. The "Hazard_ID" column identifies the Hazard ID number as assigned by the ADEC. More detailed information regarding the ADEC sites, including related reports about each site, can be obtained by searching the ADEC database by using the Hazard ID number. The ADEC database can be located at http://dec.alaska.gov/spar/csp/db_search.htm.

Table 3: Orphan Site Database

List of Orphan Sites that appear to be on land conveyed to an ANC (September 9, 2015).

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
536	ADEC	North Slope Borough Atqasuk Old Tank Farm	Atqasuk	Arctic Slope	PA 50-91-0566 SE to Atkasook Corporation, in National Petroleum Reserve -Alaska	Unknown, N Slope Borough
559	ADEC	Narl Middle Salt Lagoon	Ukpeagvik Inupiat Corp (UIC)	Arctic Slope	PA 1074960 Chester P. Lampert, 3/25/1935 or PA 1125699	DoD - Navy
1387	ADEC	North Slope Borough Wainwright former tank farm	Olgoonik	Arctic Slope	PA 50-91-0562 Olgoonik village lot 1 sec 24, T15N, R32W UM	Olgoonik, N Slope Borough
3238	ADEC	Barrow Elson former Nike facility	UIC	Arctic Slope	IC 671 (surface only) on 6/17/83, later corrected by IC 1475 surface only on 11/20/90 by T&C for land Exchanges and Resolution of Conveyance Issues in Arctic Slope Region; USS 5253, lot 11	UIC, DoD - Navy
25366	ADEC	North Slope Borough Point Hope old Bureau of Indian Affairs (BIA) Tank Farm	Tikigaq	Arctic Slope	IC 50 SE to Tigara Corporation; IC 51 SSE to Arctic Slope Regional Corporation; Point Hope Townsite	Tikigaq, N Slope Borough,

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
3059	ADEC	US Postal Service Iliamna Post Office	Iliamna Natives	Bristol Bay	Appears in water, may fall on PA 1124932 Hans Seversen, 3/17/1949	US Postal Service
3198	ADEC	National Park Service Katmai NP HQ	Paug-Vic Inc.	Bristol Bay	Patent # 50-91-0600 Paug-vik Inc. limited	USDOJ - National Park Service
3350	ADEC	Ivanof Bay Village Generator Bldg (tanks)	Bayview	Bristol Bay	ANCSA conveyed by IC 036/037; PA 50-89-0712/0713	Ivanof Bay Village Council
1141	ADEC	Deering Old Bulk Fuel Tank Farm	NANA	NANA	PA 50-10-0236/0237, Sec 20 T 8N, R19W KRM cy PA's not on line to verify dates	NANA
4141	ADEC	Utica Mine	NANA	NANA	50-2010-0236/237 on 4/22/10; orig date of transfer via IC 735 on 9/29/83; IC excluded mineral survey applications, closed of record before 2010 patent.	NANA
4615	ADEC	Kobuk Abandoned Tank Farm	NANA	NANA	50-85-0119/0120 Sec 3 T 17N, R 9E, KRM< Lot 26 USS 3788	City of Kobuk
1330	ADEC	Bruhn Point Landfill	Koniag	Koniag	verification forthcoming	DoD - USACE, Koniag
F10AK0902	USACE	Buskin Beach	Natives of Kodiak	Koniag	In water, Native of Kodiak	Unknown

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
					submit	
1037	ADEC	Lime Village School	Lime Village	Calista	50-2007-0114/5 (IC 709/10)	Lime Village Traditional Council, School District
1420	ADEC	Savoonga Native Store Tank Farm	Gambell and Savoonga	Bering Straits	IC 203 Gambell & Savoonga Native Corp	Savoonga, Savoonga Native Store
1893	ADEC	Sheldon Point Electric	Swan Lake	Calista	ANCSA conveyed to Swan Lake Corporation by IC 523; Confirm PA 50-2013-0014/015	Swan Lake, City of Sheldon Point
3102	ADEC	White Mountain BIA School - Drum Storage Area	White Mountain	Bering Straits	50-2002-0397/0398; IC 288 passed title in 1980	White Mtn, USDO I - BIA, Unknown
3354	ADEC	Marshall Fish Processing Plant	Maserculiq	Calista	ANCSA Conveyed by PA 50-83-0290/0291	Marshall Fish Processing Plant
3355	ADEC	Emmonak School Tank Farm	Emmonak	Calista	PA # 50-81-0056	School District
3357	ADEC	Emmonak Corporation Tank Farm	Emmonak	Calista	PA# 50-2012-0231 Emmonak Corporation	Emmonak

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
3380	ADEC	Kwigillingok Kwik Incorporated Former Tank Farm	Kwik	Calista	IC 591/92 (corrected by IC 1947 on 3/6/2006)	Kwik
3778	ADEC	Chefornak Light Plant Former Tank Farm	Chefarnrumute	Calista	IC #753 Chefarnrumute, Inc.	Unknown - City of Chefornak
3834	ADEC	Indian Health Service Gambell Clinic	Gambell and Savoonga	Bering Straits	IC 203 Gambell and Savoonga Native Corporations	USDHHS
4014	ADEC	Kongiganak Qemirtalek Coast Corporation Tank Farm	Qemirtalek Coast	Calista	50-2013-0164 & 0165 on 9/19/2013 to Qemirtalek Coast Corp	Qemirtalek Coast
4044	ADEC	Stebbins Landfill Drums	Stebbins	Bering Straits	ANCSA Conveyed by IC 549	City of Stebbins
25240	ADEC	Napaskiak Incorporated Store Former Tank Farm	Napaskiak	Calista	ANCSA Conveyed by IC 633/634	Napaskiak
25309	ADEC	Tuluksak Old Power Plant	Tuklisarmute	Calista	ANCSA conveyed by IC 542; Confirm PA 50-2012-0229	Tuklisarmute, Unknown
25432	ADEC	Elim Old AK Village Electric Coop Tank Farm	Elim	Bering Straits	50-79-0148, Elim Native Corp, F-20517; Sec. 19(b) of ANCSA - Reservation	Elim
25868	ADEC	Tapraq Tank Farm Stebbins	Stebbins	Bering Straits	ANCSA Conveyed by IC 549/550; PA 50-2008-0064/0065	Tapraq Fuel Co.

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
25890	ADEC	Kwigillingok Old Community Clinic	Kwik	Calista	IC 974/975	Native Village of Kwigillingok
25899	ADEC	Emmonak Yukon Delta Fisheries Development Association (YDFDA) Tank Farm	Emmonak	Calista	PA # 50-79-0111 Emmonak Corporation	Kwik'pak Fisheries
26289	ADEC	Quartermaster Loop Test Well 1 Drum Dump	Yak-Tat Kwan	Sealaska	ANCSA Conveyed 50-91-0172/0173	Unknown
276	ADEC	Kenai Gas Field Pad 41-7, 1986	Salamatof	Cook Inlet Region Inc. (CIRI)	PA 50-92-0649 SE to Salamatof native Association, Inc., PA 50-92-0644 SSE to Cook Inlet Region, Inc.	Salamatof, Hilcorp
424	ADEC	BLM Fire Island Housing	CIRI	CIRI	Significant offset between survey layer and MTO. Could be in PLO 5074/PLO 839 or on IC 527; possibly also IC 1347 and 1362	CIRI
451	ADEC	Central Alaska Utilities Site	Tyonek	CIRI	ANCSA Conveyed by IC 87; Corrected PA 50-95-0019/20; Tyonek Native Corp, USS 1865 Moquawkie Indian Reservation	Tyonek
656	ADEC	Beluga River 221-23	CIRI	CIRI	In Knik Arm	CIRI, ConocoPhillips
989	ADEC	Beluga River 224-13 Well	CIRI	CIRI	IC 1154 to CIRI	CIRI,

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
		Site				ConocoPhillips
990	ADEC	Beluga River Pump Area Assessment	CIRI	CIRI	ICs 146 and 794 to Cook Inlet Region, Incorporated	CIRI, ConocoPhillips
991	ADEC	Beluga River Tank Farm	CIRI	CIRI	IC 146 conveyed title, IC 794 is a revision to include easements. AK was potentially in the chain of title.	CIRI, ConocoPhillips
1006	ADEC	Tyonek Timber Camp	Tyonek	CIRI	ANCSA Conveyed by IC 87; Corrected PA 50-95-0019/20; Tyonek Native Corp, USS 1865 Moquawkie Indian Reservation	Tyonek
1271	ADEC	Klukwan Forest Products	Ninilchik	CIRI	50-91-0580/1 (IC 095/6)	Ninilchik Natives, Klukwan
1518	ADEC	Kodiak Lumber Mill - Tyonek	Tyonek	CIRI	ANCSA Conveyed by IC 87; Corrected PA 50-95-0019/20; Tyonek Native Corp, USS 1865 Moquawkie Indian Reservation	Tyonek
1519	ADEC	Tyonek Staging Area	Tyonek	CIRI	ANCSA Conveyed by IC 87; Corrected PA 50-95-0019/20; Tyonek Native Corp, USS 1865 Moquawkie Indian Reservation	Tyonek
2434	ADEC	Kenai Gas Field Pad 14-6	Salamatof	CIRI	PA 50-82-0087 SE to Salamatof Native Association, Inc., PA 50-82-0088 SSE to Cook Inlet	Salamatof, Hilcorp

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
					Region, Inc.	
3189	ADEC	Kenai Gas Field Pad 41-18	CIRI	CIRI	50-82-0042 (in lieu of 50-79-0138)	CIRI, Hilcorp
3191	ADEC	Kenai Gas Field Pad 41-7, 1999	CIRI	CIRI	PA 50-92-0649 SE to Salmatof Native Associaion, Inc., PA 50-92-0644 SSE to Cook Inlet Region, Inc.	Salamatof, Hilcorp
3248	ADEC	Nike Site JIG	CIRI	CIRI	Either PA 50-85-0044 to CIRI or QCD F-81649 by GSA to CIRI for Nike Site JIG in 1983	USACE, CIRI
25480	ADEC	FAA Big Lake Former Quarters and Shop	Knikatnu	CIRI	IC 146 conveyed title, IC 794 is a revision to include easements. State of Alaska was potentially in the chain of title.	Unknown, FAA, BLM
25757	ADEC	Birchwood Trespass Shooting Area	Eklutna	CIRI	verification forthcoming	Eklutna
671	ADEC	Iniskin Peninsula Drum Site	Tyonek	CIRI	verification forthcoming	Tyonek, Seldovia Native, CIRI, AKDNR
23	ADEC	Huslia Huntington School ASTs	K'oyitl'ots'ina	Doyon	PA 50-2001-0486 SE to K'oyitl'ots'ina Limited; PA 50-2001-0487 SSE to Doyon Limited (previously IC 717)	School District

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
161	ADEC	Minto School	Minto	Doyon	USS 4220A L1 ICÆd to AKFF 014897 A	School District
715	ADEC	Minto (AK Village Electric Coop) Facility	Minto	Doyon	May fall on IC 786 to Seth-de-ya-ah Corporation or NA Cert 50-87-0043	Alaska Village Electric Coop
859	ADEC	Tetlin Utilities Tank Farm	Tetlin	Doyon	PA 50-81-0152 Tetlin ANCSA Sec 19(b), USS 2547, T 16 N., R 15E. CRN	Tetlin
1159	ADEC	FDIC 40-Mile Roadhouse, Tetlin Jct.	Tanacross	Doyon	PA 50-81-0152 Tetlin Sec 19(b) USS 2547, T18Nm R14E, CRM	Private
1601	ADEC	Hughes Power Plant Pipeline	K'oyitl'ots'ina	Doyon	PA 50-95-0469 SE to K'oyitl'ots'ina, Limited; PA 50-95-0470 SSE to Doyon, Limited	City of Hughes
2312	ADEC	Allakaket School	K'oyitl'ots'ina	Doyon	PA 50-84-0773 SE to K'oyitl'ots'ina, Limited; PA 50-84-0774 SSE to Doyon, Limited	School District
2645	ADEC	Hughes School & Community Tank Farm	K'oyitl'ots'ina	Doyon	PA 50-85-0420, K'oytil'its'ina, Limited	City of Hughes, School district, ADNR
3360	ADEC	Anvik Former AVEC Tank Farm	Anvik	Doyon	On boundary of PA 74280 and PA 50-2005-0224	Deloy Ges, Alaska Village Electric Coop

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
3362	ADEC	Anvik Deloy Ges Inc. TF#2	Anvik	Doyon	PA 50-2005-0224 SE to Deloy Ges, Incorporated, PA 50-2005-0225 SSE to Doyon, Limited	Deloy Ges
3363	ADEC	Anvik Chase Enterprise Store Tank Farm	Anvik	Doyon	PA 50-2005-0224 SE to Deloy Ges, Incorporated, PA 50-2005-0225 SSE to Doyon, Limited	Deloy Ges
3364	ADEC	Anvik Commercial Co. Tank Farm	Anvik	Doyon	PA 50-2005-0224 SE to Deloy Ges, Incorporated, PA 50-2005-0225 SSE to Doyon, Limited	Deloy Ges
3947	ADEC	Arctic Village Airport Power Plant & Utility Tank Farm	Arctic Village	Doyon	50-80-0027	Arctic Village Traditional Council
4035	ADEC	Indian River Gold Mine Camp	Hughes	Doyon	IC 788	Doyon, Strandberg & Sons
4376	ADEC	Arctic Village Former Power Plant	Arctic Village	Doyon	PA 50-80-0027 Neets'ai Coporation and Venetie Indian Corporation, 12/17/1979	Arctic Village Traditional Council
4545	ADEC	City of Allakaket Diesel Tank Farm	Allakaket	Doyon	PA 50-2005-0348 SE to K'oyitl'ots'ina, Limited; PA 50-2005-0349 SSE to Doyon, Limited	City of Allakaket
25407	ADEC	Anvik Former School Site	Anvik	Doyon	PA 50-2005-0224, just outside of PA 74280	Unknown; State of AK; Deloy Ges; School Dist

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
25627	ADEC	Allakaket Old Generator Shack	K'oyitl'ots'ina	Doyon	PA 50-84-0773 SE to K'oyitl'ots'ina, Limited; PA 50-84-0774 SSE to Doyon, Limited	Unknown
25628	ADEC	Allakaket Former City Gasoline Tank Farm	K'oyitl'ots'ina	Doyon	PA 50-2005-0348 SE to K'oyitl'ots'ina, Limited; PA 50-2005-0349 SSE to Doyon, Limited	Unknown
25630	ADEC	Allakaket Former City Power House	K'oyitl'ots'ina	Doyon	PA 50-2005-0348 SE to K'oyitl'ots'ina, Limited; PA 50-2005-0349 SSE to Doyon, Limited	Unknown
26033	ADEC	Tetlin Rock Hill Warehouse	Tetlin	Doyon	50-81-0152	Tetlin, Tetlin Village Council
26250	ADEC	Tanana Community Hall	Tanana	Doyon	Either ANCSA Conveyed 50-85-0281 Tozitna Limited; 50-85-0282 Doyon Limited, or PA 1180100 Townsite Trustee BLM hard to determine because the site is on the line	Unknown; Tozitna
26328	ADEC	Arctic Village Council Gasoline Sales Tank	Arctic Village	Doyon	verification forthcoming	Arctic Village Traditional Council
	NEW	Tetlin 40 Mile Roadhouse Dump	Tetlin	Doyon	verification forthcoming	Unknown
	NEW	Stephens Village Landfill	Dinyea	Doyon	verification forthcoming	Unknown
	NEW	Tok Dump	Tetlin	Doyon	verification forthcoming	Unknown

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
	NEW	Old Tok School	Tetlin	Doyon	verification forthcoming	Unknown
	NEW	Northway	Northway	Doyon	verification forthcoming	Unknown
1365	ADEC	Amchitka - South Bight Quarry	Aleut	Aleut	Site plotted in ocean, needs verification of location	USDOI - FWS, USACE
1369	ADEC	Dutch Harbor-Strawberry Hill Landfill	Ounalashka	Aleut	PA 50-76-0022 SE to Ounalashka Corporation; PA 50-76-0024 SSE to Aleut Corporation	Ounalashka; USACE
2159	ADEC	St. Paul TPA 01 Oil Drum Dump Site FUDS	Tanadgusix	Aleut	PA 50-90-0669 to Tanadgusix Corporation, PA 50-90-0670 to Aleut Corp	Tanadgusix, USACE
25821	ADEC	Dutch Harbor-Fort Mears Public Works Garage (Bldg 484)	Ounalashka	Aleut	PA 50-90-0651 SE to Ounalashka Corporation; PA 50-90-0652 SSE to Aleut Corporation	Ounalashka; USACE
3659	ADEC	Dutch Harbor-Warehouse WWII B 551	Ounalashka	Aleut	ANCSA Conveyed by PA 50-76-0022/0024	Ounalashka; USACE
4371	ADEC	Electrical & Plumbing Shop (St. George)	Tanaq	Aleut	verification forthcoming	City of St. George
4372	ADEC	Old Machine Shop (St. George)	Tanaq	Aleut	verification forthcoming	City of St. George

HAZARD ID	AGENCY	SITE NAME	CORPORATION	REGIONAL CORP	CONVEYANCE NOTES	PRP
4463	ADEC	Old Coal House (St. George)	Tanaq	Aleut	verification forthcoming	Saint George Traditional Council
4464	ADEC	Old Power Plant / Cottage G (St. George)	Tanaq	Aleut	verification forthcoming	Saint George Traditional Council
3359	ADEC	Emmonak Grant Air Former Tank Farm	Emmonak	Calista	PA # 50-2012-0231	Grant Aviation
	NEW	Shishmaref Chuckhi Sea Sheen	Shishmaref	Bering Straits	verification forthcoming	Unknown
	NEW	Koyuk Power Plant waste	Koyuk	Bering Straits	verification forthcoming	AVEC
25270	ADEC	Eyak NALEMP Point Whitshed Naval Radio Sta	Eyak	Chugach	verification forthcoming	USACE
	NEW	Landfill on Hanger Lake Road	Bethel	Calista	verification forthcoming	unknown
25819	ADEC	Dutch Harbor-Fort Mears Landfill (North)	Ounalashka	Aleut	verification forthcoming	unknown
25820	ADEC	Dutch Harbor-Fort Mears Landfill (South)	Ounalashka	Aleut	verification forthcoming	unknown

APPENDIX B – U.S. Air Force Defense Environmental Restoration Program (DERP)

The Department of Defense (DoD) is responsible for environmental restoration of properties at former Air Force installations that were conveyed to ANCs after 1986. The Air Force falls under installations and properties managed by the Pacific Air Forces Regional Support Center (PRSC) at Joint Base Elmendorf-Richardson (JBER), Alaska. The Air Force Civil Engineer Center (AFCEC) in Alaska manages the environmental restoration projects at PRSC installations and properties, including those in the Environmental Restoration Program in remote Alaska.

Environmental cleanup at these properties is conducted in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Petroleum-only contaminated sites are managed in accordance with State of Alaska regulation 18 AAC 75.325. Goals of the environmental restoration program are 1) to take appropriate response actions to investigate and, where necessary, address releases of hazardous substances or pollutants and contaminants, and 2) correct other environmental damage which creates an imminent and substantial endangerment to the public health or welfare, or to the environment. AFCEC coordinates with the Alaska Department of Environmental Conservation (ADEC), federally-recognized Tribes, the U.S. Environmental Protection Agency, landowners (including ANCSA corporations), and the public in performing environmental restoration activities in Alaska.

Figure 8 below shows the conveyance and clean-up status for those 11 sites conveyed to an ANC.

Figure 8: U.S. Air Force Environmental Restoration Program Sites for Pacific Air Forces Regional Support Center (PRSC) Installations

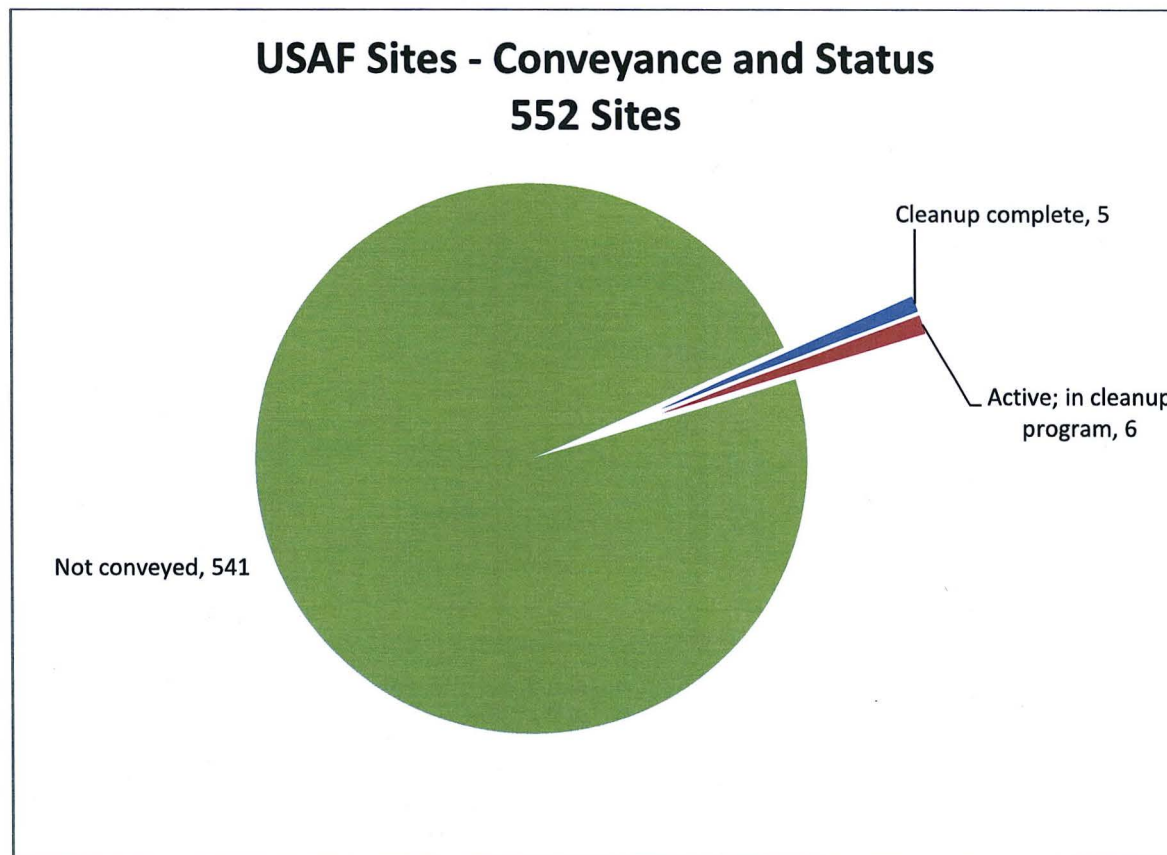


Table 4: U.S. Air Force Sites that Appear to be on Lands Conveyed to an ANCSA Corporation (September 9, 2015)

Table 4 below gives further site information on those 11 sites conveyed to an ANCSA Corporation. Flag notes show the conveyance documents for reference.

ID	Installation	MAJCOM	Site_Id	Site_Name	Flag	Flag_Notes
23	DRIFTWOOD BAY RADIO RELAY STATION	PACAF	TU012	Former USTs near lighting vault	Yes	IC 2112 Ounalashka Corp/ IC 2113 Aleut Corporation
25	DRIFTWOOD BAY RADIO RELAY STATION	PACAF	SS004	Former Drum Storage Area	Yes	IC 2112 Ounalashka Corp/ IC 2113 Aleut Corporation
27	DRIFTWOOD BAY RADIO RELAY STATION	PACAF	SS011	Former Lighting Vault at Runway	Yes	IC 2112 Ounalashka Corp/ IC 2113 Aleut Corporation
28	DRIFTWOOD BAY RADIO RELAY STATION	PACAF	SS014	Heavy Equipment Storage	Yes	IC 2112 Ounalashka Corp/ IC 2113 Aleut Corporation
31	NORTH RIVER RADIO RELAY STATION	PACAF	SS004	Drums and Stained Soil (B)	Yes	PA 50-2013-0124/125 BSNC
46	DRIFTWOOD BAY RADIO RELAY STATION	PACAF	LF006	Old Disposal Area	Yes	IC 2112 Ounalashka Corp/ IC 2113 Aleut Corporation
51	DRIFTWOOD BAY RADIO RELAY STATION	PACAF	SS010	Former Water Supply Pumphouse	Yes	IC 2112 Ounalashka Corp/ IC 2113 Aleut Corporation
63	NORTH RIVER RADIO RELAY STATION	PACAF	SO001	Vehicle Maintenance Building UST	Yes	PA 50-2013-0124/125 BSNC
65	NORTH RIVER RADIO RELAY STATION	PACAF	SS003	Drums and Stained Soil (A)	Yes	PA 50-2013-0124/125 BSNC
71	PORT HEIDEN RADIO RELAY STATION	PACAF	LF007	Landfill No 1 at Former Composite Bldg	Yes	PA 50-2007-0671/0672 BBNC
74	WAINWRIGHT	PACAF	LF006	ABANDONED LANDFILL: AC	Yes	IC 1456 ASRC; 50-91-0562 Olgoonik Corporation, Inc.

APPENDIX C – U.S. Army Corps of Engineers Formerly Used Defense Sites (FUDS)

The Department of Defense (DoD) is responsible for environmental restoration of properties that were formerly owned by, leased to, or operated by the United States and under the jurisdiction of the Secretary of Defense prior to October 1986.

The U.S. Army Corps of Engineers (USACE) executes the program on behalf of the DoD. The scope and magnitude of the FUDS program is significant, with more than 530 properties in Alaska and over 10,000 properties nationwide identified for potential inclusion in the program. Information about the origin and extent of contamination, land transfer issues, past and present property ownership, and program policies must be evaluated before DoD considers a property eligible for Defense Environment Restoration Account funding under the FUDS program.

Environmental cleanup at FUDS properties is conducted in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). That work includes identifying eligible properties, investigating their condition, and addressing any contamination by hazardous substances that was the result of DoD activities. The USACE is committed to addressing this contamination in a safe, timely, and responsive manner. Teams from USACE districts coordinate with state environmental offices, federally recognized tribes, the U.S. Environmental Protection Agency, landowners (including ANCSA corporations), and the public in performing the work.

Table 6 below, "FUDS Sites that Appear to be on Lands Conveyed to an ANCSA Corporation", is a result of the inventory information solicited from the USACE in 2014 and communications through September 9, 2015. The site information was obtained from the USACE/FUDS Program (Pacific Ocean Division- Alaska District) and the coordinate locations were verified against the BLM land status records to determine if the site was located on lands conveyed to an ANC. A total of 120 sites, based on existing information, appear to be on lands conveyed to an ANC. For 22 sites, the coordinates reported to the BLM make it difficult to determine if the site is actually on lands conveyed to an ANC or not. However, based on the surrounding land status, the BLM has made an initial preliminary determination that the site may "probably" or "possibly" be on land conveyed to an ANC but this will have to be verified. The review with USACE included clean-up activity as shown in the table and graph below. Of particular interest are those sites that require further verification (84 sites) as to what contamination exists, if any, and who is the potentially responsible party.

Table 9 in Appendix E, entitled "2014 Update on the Sites Reported by ANCSA Corporations in 1998," shows which of these sites were included in the 1998 Report to Congress (See Column "Site Number/Name" for applicable USACE site). The BLM has attempted to report the current status of these sites based on preliminary contact with the USACE, but this information will need to be verified (See Column "Clean_Up_P"). Of the 142 sites listed in the following table, 56 of them were listed in the 1998 Report and this table provides their current status.

The BLM has also attempted to decipher which of the sites reported to it by the USACE may potentially be listed in the State of Alaska's Contaminated Sites Program database maintained by the Alaska Department of Environmental Conservation (ADEC), and, therefore, would be also reported in the table in Appendix A (Orphan Site Database). The multiple agency and ANC effort has and will continue to enhance the accuracy and eliminate duplication.

Table 5: Summary of FUDS Sites that Appear to be on Lands Conveyed and Unknown Conveyed to an ANCSA Corporation (September 9, 2015)

USACE – FUDS Table Summary – CONVEYED and UNKNOWN-CONVEYED TO ANCSA CORPORATION		
142 Sites		
	No. Sites	Percent of Total
Sites Need Verification – USACE deemed ‘No Hazard’ – PA/SI complete, and Orphan	84	59%
In Active Program for Cleanup or Cleanup Scheduled	40	28%
Cleanup Complete	8	6%
Duplicate Sites	5	4%
Other PRP (US Air Force Site, FAA, other federal agency, other state or local entity)	5	4%
TOTAL	142	100%⁵

⁵ Percentages rounded

46 **Figure 9: U.S. Army Corps of Engineers (USACE) Formerly Used Defense (FUDS) Sites (September 9, 2015)**

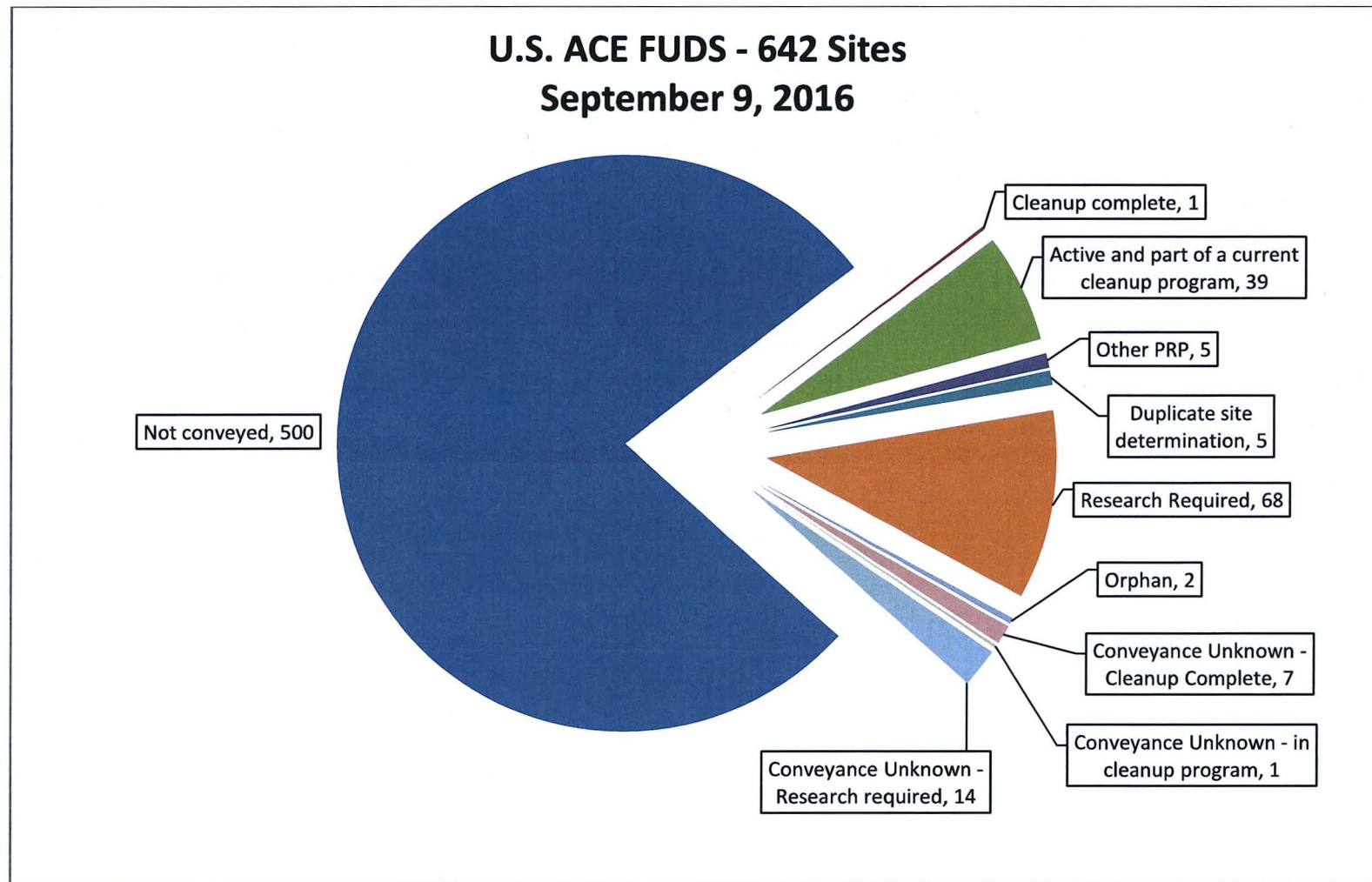


Table 6: FUDS Sites that Appear to be on Lands Conveyed and Unknown Conveyed to an ANCSA Corporation (September 9, 2015)

FUDS #	PROPERTY	CONV	CONVEYED NOTES
F10AK0041	AFOGNAK ISLAND COASTAL DEFENSE SITE	Yes	ANCSA Conveyed by PA 50-98-0417/0418
F10AK0400	AIR FORCE CACHE #01	Yes	ANCSA conveyed PA 50-2008-0067 Tikigaq Corporation; PA 50-2008-0068 Arctic Slope Regional Corporation
F10AK1028	AKUTAN NAVAL RS	Yes	ANCSA conveyed 50-2011-0167 The Akutan Corporation; 50-2011-0168 The Aleut Corporation
F10AK0046	ANCHORAGE-TOK ACS	Yes	ANCSA PAT 50-81-0152 Tetlin Native Corp
F10AK0049	ANGOON MICROWAVE STA	Yes	Surface Estate conveyed to Kootznoowoo Inc., Subsurface Estate conveyed to Sealaska Inc., by Section 506 of ANILCA
F10AK0297	BELLS FLATS, KODIAK NS	Unknown	In water
F10AK0539	BETHEL 30 ENG TOPO BN	Yes	IC 142/143, Bethel/Calista Corp.
F10AK0540	BETHEL 660TH ENG SITE	Yes	IC 142/143, Bethel/Calista Corp.
F10AK0514	BETHEL ARPT	Yes	ANCSA conveyed IC 142 Bethel Native Corporation; IC 143 Calista Corporation
F10AK0901	BRUHN PT. (KODIAK ISL)	Yes	PA 50-96-0562, Koniag, Inc.
F10AK0902	BUSKIN BCH-KODIAK ISL	Orphan	In water
F10AK0503	CATHEDRAL RR SITE	Yes	IC 1508/1509 Tanacross/Doyon Sec 32 T19N, R9E CRM
F10AK0076	CHARCOAL ISL	Yes	ANCSA Conveyed by PA 50-86-0124/0125
F10AK1060	CHEFORNAK TERN MOUNTAIN	Yes	IC 753, Chefarnrmute, Inc.
F10AK0295	CONSTANTINE PT END STA	Yes	ANCSA Conveyed by IC 223; PA 50-90-0651/0652
F10AK1046	COPPER CENTER WEATHER STATION	Unknown	Contaminated site appears to be in the Klutina River
F10AK0328	EAGLE RIV MISSILE ANX	Yes	ANCSA Conveyed 50-79-0094 Eklutna, Inc. 50-79-0095 Cook Inlet Region, Inc.
F10AK0561	FORT ABERCROMBIE	Unknown	Loacted in water (Mill Bay) possibly PA 50-65-0224 State of Alaska
F10AK0387	FORT BULKLEY	Unknown	Located in water, Marys Bay
F10AK0563	GLENNALLEN ACS COMM	Yes	ANCSA Conveyed 50-80-0002 Tazlina Incorporated, 50-80-0003 AHTNA, Inc.
F10AK0008	GRIFFIN POINT DEW	Unknown	Offshore (Oruktalik Lagoon) PL 96-487 Wdl Arctic NWR
F10AK0122	HOONAH RRS	Yes	ANCSA conveyed 50-90-0299 Huna Totem Corporation; 50-90-0322 Sealaska Corporation

FUDS #	PROPERTY	CONV	CONVEYED NOTES
F10AK1058	IGUIGIG	Unknown	appears to be located in the Kvichak River
F10AK1072	ILAK ISLAND	Unknown	Water
F10AK0131	KANAKANAK RADIO REL AX	Yes	ANCSA Conveyed IC 1121 Choggiung Ltd., IC 1122 Bristol Bay Native Corporation
F10AK0444	KANAKANAK RADIO STA	Orphan	Sec. 3(e) Wdl AA-29646
F10AK0022	KOGRU DEW (POW B)	Unknown	In water W/I National Petroleum Reserve -Alaska
F10AK0153	LYMAN ANCH ACS SUBCABL	Yes	ANCSA Conveyed by PA 50-80-0019/0020
F10AK0007	MANNING POINT DEW	Yes	PA 50-77-0046 Kaktovik SE, 50-83-0239 ASRC SSE 8/9/83 J Watt signed PA SSE
F10AK0969	NE CAPE (ST LAWRENCE ISLAND)	Yes	IC 203 Gambell & Savoonga Native Corp
F10AK0347	NORTHWAY STAGING FLD	Yes	ANCSA conveyed IC 1377 Northway Natives Incorporated; IC 1378 Doyon, Limited; Corrected by IC 2409 & 2410
F10AK0178	NULATO RADIO STA	Yes	PA 50-2008-0211 Doyon, 50-2008-0210 Gana-a'Yoo, Ltd
F10AK0471	PILLAR MT RR SITE	Unknown	Verify with USACOE
F10AK0187	PLATINUM BATTALION	Yes	ANCSA conveyed 50-2012-0070 Arviq Incorporated; 50-2012-0071 Calista Corporation
F10AK0068	PT BISHOP ACS SUBCABLE	Yes	ANCSA Conveyed by IC 1264; PA 50-2007-0500
F10AK0263	SKWENTNA AIRCRAFT COM	Yes	ANCSA conveyed 50-2014-0036 Cook Inlet Region, Inc.
F10AK0036	UNALAKLEET AFSTA	Yes	PA 50-04-0462/0463 cy not on line to verify date
F10AK0783	UNALAKLEET NGS	Yes	PA 50-04-0462/0463 no cy on line to verify date
F10AK0596	UNALAKLEET REC ANX	Yes	ANCSA conveyed PA 50-2004-0462 Unalakleet Native Corporation; PA 50-2004-0463 Bering Straits Native Corporation
F10AK0597	UNALAKLEET REC FISH CP	Yes	PA 50-04-0462/0463 lot 1, sec 8 cy PA not on line to verify date
F10AK0270	WHITE MT NAT-L GUARD	Yes	PA 50-2002-0397/98 BSNC
F10AK0251	WILDWOOD AFS	Yes	PA 50-74-0109 SE to Kenai Natives Association, PA 50-74-0151 SSE to Cook Inlet Region, Inc
F10AK0319	GULKANA PREP & ARMY	Yes	ANCSA conveyed IC 209 Sta-Keh Corporation; IC 210 Ahtna, Inc.
F10AK0143	KWIGUK AWS STA	Unknown	Located in water, Kwikluak Pass of the Yukon River
F10AK1034	KING COVE NAVAL FACILITY	Yes	ANCSA Conveyed by IC 151/152; PA 50-93-0594/0595
F10AK0200	SALCHA ARMY ASP	Yes	PA 50-84-0068 N1/2NE, Sec 32, T 4S., R4E, FM
F10AK0376	TIGALDA ISLAND	Yes	ANCSA conveyed PA 50-2013-0026, surface estate The Akutan Corporation
F10AK0237	TRANS-CANADIAN RAIL S	Yes	PA 50-07-0257/0258, Sec 26, T 6S., R 5 W., FM cy not on line to verify; title issued FY 07

FUDS #	PROPERTY	CONV	CONVEYED NOTES
F10AK0290	MONASHKA BAY,KODIAK	Unknown	In water, uplands are owned by both ANCSA and State (some non-ANCSA private as well). Could fall on either owner
F10AK0851	ATKA AF AUX FLD	Yes	ANCSA Convey by IC 159; PA 50-2004-0276
F10AK1063	ATKA CAPE KUDUGNAX	Yes	ANCSA Conveyed by IC 159
F10AK0653	DEERING NGS	Yes	PA50-2010-0236
F10AK0074	CAPE PRINCE WALES AWS	Yes	ANCSA Conveyed by IC 492/493; PA 50-92-0678/0679 BSNC
F10AK0294	CAPE RODNEY (MIL SITE)	Yes	PA 50-89-0749 and 50-89-0750 BSNC
F10AK0002	CAPE SABINE DEW(LIZ-A)	Yes	ANCSA conveyed 50-2014-0056 Cully Corporation, Inc.; 50-2014-0057 Arctic Slope Regional Corporation
F10AK0001	CAPE THOMPSON NAV SITE	Yes	ANCSA conveyed 50-2015-0057 Arctic Slope Regional Corporation
F10AK0350	FORT ROUSSEAU, SITKA	Unknown	Located in water, Whiting Harbor
F10AK0280	FORT TIDBALL/LONG ISLAND	Yes	ANCSA conveyed 50-86-0067 Leisnoi, Inc. 50-86-0068 Koniag, Inc., Regional Native Corporation
F10AK0081	CHISTOCHINA ACS	Yes	ANCSA conveyed IC 235 Cheesh-Na, Incorporated; IC 236 Ahtna, Inc.
F10AK1011	BETTLES RRS	Yes	PA 50-2012-199/200 Evansville, Inc.
F10AK0553	EKLUTNA ARMY ASP SITE	Yes	PA# 50-74-0164 Eklutna INC.
F10AK0410	AIR FORCE CACHE #13	Yes	ANCSA conveyed 50-2008-0020 Baan o yeel kon Corporation; 50-2008-0021 Doyon, Limited
F10AK0411	AIR FORCE CACHE #14	Yes	ANCSA conveyed 50-2012-0011 Doyon, Limited
F10AK0414	AIR FORCE CACHE #17	Yes	ANCSA conveyed 50-2007-0204 Gana-a'Yoo, Limited Successor in Interest to Notaaghleedin, Limited; 50-2007-0205 Doyon, Limited
F10AK0853	NIKE SITE JIG	Yes	PA 50-84-0068, N1/2NE, Sec 32, T4S, R4E, FM
F10AK0854	NIKE SITE LOVE	Yes	Conveyed to CIRI PA 50-84-0629
F10AK0278	Woody Island Naval Reservation	Yes	ANCSA conveyed by PA 50-94-0127/0128
F10AK0057	AURORA RADIO RELAY	Unknown	Either Deed from US to AT&T Alascom; or ANCSA conveyed IC 564 Ahtna, Incorporated Successor in Interest to Gakona Corporation, IC 565 Ahtna, Incorporated
F10AK0995	BARTER ISLAND DEW STATION	Yes	IC 808 SE Kaktovik, IC 809 SSE ASRC
F10AK0059	BEAR CREEK RADIO RELAY	Yes	IC 705 Doyon Ltd
F10AK0744	NOORVIK NG SITE	Yes	PA 50-02-0470/0471 cy not on line to verify date
F10AK0283	NORTH CAPE HARBOR DEFENSE, KODIAK	Yes	ANCSA Conveyed IC 64 Ouzinkie Native Corporation, IC 65 Koniag, Inc.

FUDS #	PROPERTY	CONV	CONVEYED NOTES
F10AK0037	NORTH RIVER RRS ANX	Yes	ANCSA conveyed 50-2013-0124 Unalakleet Native Corporation; 50-2013-0125 Bering Straits Native Corporation
F10AK0177	NORTHWAY ACS	Yes	ANCSA conveyed 50-79-0088 Northway Natives Incorporated; 50-79-0089 Doyon, Limited
F10AK0240	TYONEK ACS COMMS SITE	Yes	ANCSA conveyed by IC 87; Corrected PA 50-95-0019/20; Tyonek Native Corp, USS 1865 Moquawkie Indian Reservation
F10AK0241	UGADAGA BAY STA	Yes	ANCSA Conveyed by IC 223; PA 50-90-0651/0652
F10AK0415	AIR FORCE CACHE #18	Yes	ANCSA conveyed 50-94-0365 Doyon, Limited
F10AK0416	AIR FORCE CACHE #19	Yes	ANCSA conveyed 50-95-0099 Doyon, Limited
F10AK0422	AIR FORCE CACHE #55	Yes	ANCSA Conveyed 50-94-0334 Nerklikmute Native Corporation; 50-94-0335 Calista Corporation
F10AK0075	CATHEDRAL BLUFF ACS	Yes	IC 1508/1509 Tanacross/Doyon Sec 32, T19N, R9E, CRM
F10AK0339	CATHEDRAL POINT	Yes	ANCSA Conveyed by IC 223; Confirm PA 50-90-0651/0652
F10AK0090	DIAMOND RIDGE RR	Yes	ANCSA Conveyed 50-82-0042 Cook Inlet Region, Inc.
F10AK0846	DUTCH HARBOR	Yes	ANCSA Conveyed by PA 50-93-0187/0188
F10AK0861	ST PAUL/ST GEORGE	Unknown	In water, verify location
F10AK1042	ST. PAUL NAVAL RADIO STATION	Yes	IC 149; PA 50-90-0669 SE to Tanadgusix Corporation, PA 50-90-0670 SSE to Aleut Corporation
F10AK0323	BIRCHWOOD ARMY SITE	Yes	PA# 50-78-0015/surface- Issued to Eklutna INC
F10AK0550	CORDOVA ACS REMOTE REC	Yes	ANCSA Conveyed IC 127 Eyak Corp., IC 128 Chugach Natives Inc. now known as Chugach Alaska Corporation
F10AK0086	DAVIDSON-S LANDING	Yes	ANCSA conveyed IC 945 Mary's Igloo Native Corporation; IC 946 Bering Straits Native Corporation
F10AK0097	EKLUTNA ARMY SITES	Yes	ANCSA conveyed 50-93-0601 Eklutna, Inc.; 50-93-0602 Cook Inlet Region, Inc.
F10AK0554	EKLUTNA DISPERSAL SITE	Yes	PA# 50-2009-0362
F10AK0020	ELSON LAGOON	Unknown	Located in water (Elson Lagoon) Possibly ANCSA conveyed IC 045 Ukpeagvik Inupiat Corporation
F10AK1006	ELSON NIKE	Yes	IC 045 SE Ukpeagvik
F10AK0289	ENTRANCE POINT, KODIAK	Yes	ANCSA conveyed IC 1664 Ouzinkie Native Corporation; IC 1665 Koniag, Inc., Regional Native Corporation
F10AK0302	FORT TONGASS	Yes	ANCSA Conveyed by IC 1424
F10AK0693	FORT YUKON AIR PORT	Yes	ANCSA conveyed 50-2007-0573 Gwitchyaazhee Corporation; 50-2007-0574 Doyon, Limited

FUDS #	PROPERTY	CONV	CONVEYED NOTES
F10AK0440	GALANKIN ISL DEF SITE	Unknown	Located in water, Middle Channel Sitka Bay
F10AK1079	GALENA FORMER EOD RANGE	Yes	PA 50-2007-0204 Gana-a'Yoo, Ltd, PA 50-2007-0205 Doyon, Ltd.
F10AK0696	GAMBELL	Yes	IC 203
F10AK0568	ILIAMNA PETROLEUM STO	Yes	ANCSA Conveyed IC 283 Newhalen Native Corporation, IC 284 Bristol Bay Native Corporation
F10AK1055	KIZHUYAK HARBOR DEFENSE OBSERVATION POST	Unknown	In Water
F10AK0095	KODIAK (E CPE HBR DEF)	Yes	ANCSA conveyed IC 064; IC 065
F10AK0840	KODIAK CG SUP CNTR	Yes	PA 50-84-0574/0575 Koniag, Inc.
F10AK0859	KODIAK TRACKING STA	Yes	
F10AK0504	MENTASTA ACS RR SITE	Yes	IC 226/227 Mentasta/AHTNA, Tr D, USS 4362, T13N., R8E., CRM
F10AK0158	MIDDLETON ISL AFS	Yes	IC 911 Chugach Natives, Inc.
F10AK0162	MOSES POINT GARRISON	Yes	50-79-0148, Elim Native Corp, F-20517; Sec. 19(b) of ANCSA - Reservation
F10AK0996	MOUNTAIN VILLAGE	Yes	PA 50-91-0585/0586 Calista
F10AK1066	POINT HOPE ARMY CAMP	Yes	IC 050/051 Sec 14 T34N, R35W KRM
F10AK1044	POINT HOPE WEATHER STATION	Yes	PA 50-92-0323/0324 lot 13 USS 3515, T34N, R35W, KRM
F10AK1054	POINT LAY	Yes	IC 056/057 Pt Lay/ASRC lot 3, Sec 26 T5N, R45W, UM cy IC not on line to verify date
F10AK0190	PORT LIONS ACS COMM ST	Yes	PA 50-2011-0183 Afognak Native Corp.
F10AK0204	SANAK ISLAND ARMY AWS	Yes	ANCSA conveyed IC 379 Sanak Corporation, IC 380 The Aleut Corporation
F10AK0386	SAND PT NAV AUX AIR FA	Yes	ANCSA Conveyed by IC 121
F10AK0015	UNALGA ISL NAV RADIO	Yes	Possible duplicate site with ADEC ANCSA conveyed to Akutan PA 50-2011-0166, then deeded back to FWS in exchange; excluded FUDS sites for clean up
F10AK0999	ANUA RIVER BRIDGE	Yes	ANCSA conveyed by IC 761/762; Confirm PA 50-2011-0173/0174
F10AK0510	BETHEL BIA HDQRS	Yes	ANCSA conveyed IC 1201 Bethel Native Corporation; IC 1202 Calista Corporation
F10AK0541	BETHEL NG HANGER	Unknown	Located in water, Hangar Lake
F10AK0063	BETTLES ARPT	Yes	ANCSA conveyed 50-2012-0199 Evansville, Incorporated; 50-2012-0200 Doyon, Limited
F10AK0427	CAPE BURUNOF DEF SITE	Unknown	Located in water, Sitka Sound
F10AK0279	CAPE CHINIAK TRACK STA	Yes	ANCSA Conveyed by IC 171/172
F10AK0293	CAPE NOME ACS	Yes	ANCSA conveyed 50-82-0148 Sitnasuak Native Corporation; 50-82-0149 Bering

FUDS #	PROPERTY	CONV	CONVEYED NOTES
			Straits Native Corporation
F10AK0013	CHERNOFSKI HBR SUP&STO	Yes	ANCSA Conveyed by IC 483; PA 50-90-0669/0670
F10AK0105	FORT GIBBON	Yes	IC 1038/1039 Doyon
F10AK1024	FORT KENAI ARMY POST	Yes	ANCSA PA for the Subsurface Estate Cook Inlet Region, Inc., PA 1217618 State of Alaska
F10AK0017	FORT LEARNARD	Yes	ANCSA conveyed IC 223
F10AK0281	KASLIN BAY HBR DEF,KOD	Unknown	In Water
F10AK0583	N-WAY SPUR ACS PLINE R	Yes	ANCSA Conveyed PAT 50-2013-0133 Nothway Natives, Incorporated and 50-2013-0134 Doyon, Limited
F10AK0747	OCEAN CAPE RR SITE	Yes	ANCSA conveyed 50-91-0172 Yak-Tat Kwaan, Incorporated; 50-91-0173 Sealaska Corporation
F10AK0180	OGLIUGA ISL	Unknown	Located in water, should possibly be moved eastward to Ogliuga Island, T. 99S., R. 210-211W., SM
F10AK0246	VOLKMAR RIVER SITE	Yes	PA 50-95-0666 SE to Mendas Cha-Ag Native Corporation PA 50-95-0667 SSE to Doyon Limited
F10AK0284	LAZY BAY AWS STA,KODIA	Unknown	Verify with USACOE, this could fall on ANCSA land
F10AK1008	FEATHER RIVER	Unknown	In the water - Wooley Lagoon
F10AK0466	COLD BAY PAVLOF UNIT	Yes	ANCSA Conveyed by IC 151/152; PA 50-90-0653/0654
F10AK0402	AIR FORCE CACHE #03	Unknown	Located in Salmon Lake
F10AK0405	AIR FORCE CACHE #06	Unknown	Located in Glacial Lake; uplands are ANCSA conveyed to Bering Straits Native Corporation
F10AK0408	AIR FORCE CACHE #09	Unknown	Located in Golovin Bay/Bering Sea
F10AK1067	HEALY LAKE VILLAGE	Unknown	
F10AK0841	AMAKNAK	Yes	ANCSA Conveyed by PA 50-76-022/0024
F10AK0842	AMAKNAK ISL	Yes	ANCSA Conveyed by IC 014; PA 50-90-0651/0652
F10AK0489	TANANA NGS	Yes	ANCSA conveyed IC 1701 Tozitna, Limited; IC 1702 Doyon, Limited
F10AK0231	TELLER SUPPLY	Unknown	Located in Grantley Harbor
F10AK0798	TETLIN ARMY CP	Yes	PA 50-81-0152, USS 2547, T18N, R14E CRM

APPENDIX D- U.S. Federal Aviation Administration (FAA)

The Federal Aviation Administration's (FAA's) Environmental and Occupational Safety and Health (EOSH) Services developed the Environmental Cleanup (ECU) Program to address the cleanup of contaminated sites where the FAA maintains liability due to past site operations or waste disposal activities. In managing these sites, the FAA is required to comply with numerous Federal, state, and local environmental regulations including the U.S. Environmental Protection Agency's (EPA's) Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Superfund Amendments and Reauthorization Act (SARA).

The ECU Program encompasses all of the necessary planning, organization, evaluation, and implementation activities associated with remedial responses at FAA's contaminated sites where the release of contaminant(s) to the environment is known to have occurred, is considered to be likely/suspected based on visual observations, or is inferred based on historical activity. The following activities are covered by ECU Program activities:

- Site cleanups required under CERCLA;
- Site cleanups required by state or local cleanup or spill regulations;
- Fuel Storage Tank (FST) site remediation for clean-up efforts beyond incidental contamination associated with normal FST operations (e.g., greater than 25 gallons or a foot into native soil beyond the limits of the tank pit);
- Asbestos, lead, and polychlorinated biphenyl (PCB) cleanups for spills or other releases into the environment (not including the abatement of these materials on either the interior or exterior surfaces of a structure unless the abatement is required as part of an environmental clean-up action);
- Corrective actions and hazardous waste spill responses pursuant to the Resource Conservation and Recovery Act (RCRA); and
- Hazardous waste site identification activities and characterization of environmental past practices.

Figure 10: Federal Aviation Administration Sites (September 9, 2015)

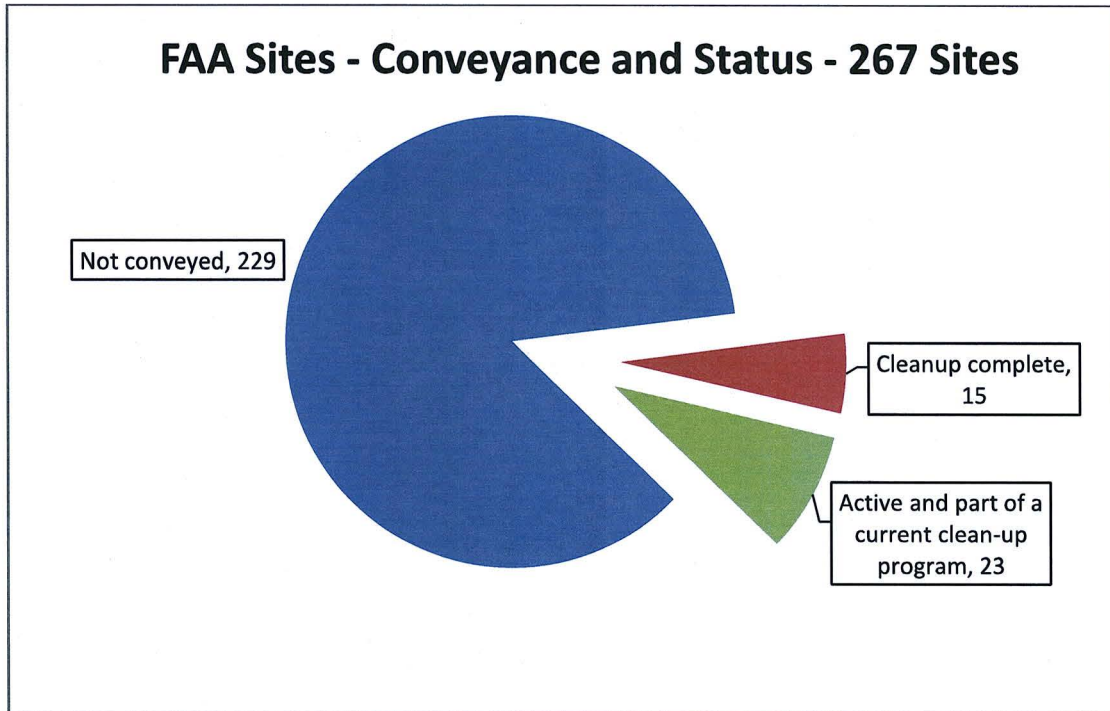


Table 7: FAA Sites that Appear to be on Lands Conveyed and Unknown Conveyed to an ANCSA Corporation (September 9, 2015)

FAC	LOC	FACID	FAC History	Flag	Flag_Notes
ARSR	ENA	111	Located approximately 3 mi NW of Runway 01/19 and it is maintained in 3.11 acres that are leased form Kenai Natives Association, Inc.	Yes	ANCSA conveyed PA 50-74-0109 Kenai Native Association, Inc.; PA 50-74-0151 Cook Inlet Region, Inc.
BET	BET	58	The former FAA Station No. 146 is located approximately 3.9 miles east of the current station. It is approximately 1,800 acres in size and according to the 1992 ECIR is owned by the BLM. However, correspondence between FAA and the Bethel Native Corporation	Yes	ANCSA conveyed IC 142 Bethel Native Corporation; IC 143 Calista Corporation
VHF	HBK	144	The former VHF facility is located southwest of the Former Air-Cooled Transformer Site. The property is overgrown with thick vegetative cover primarily composed of alder. The facility, which consisted of the VHF building and a personnel housing unit.	Yes	IC 1772 The Eyak Corporation; 1773 Chugach Alaska Corporation ; title passed 12/9/1998
VORTAC	BRW	78	The VORTAC is located on the southwest part of the Station and occupies approximately 2.07 acres.	Yes	IC 1436 SE within Sec 7 T22N, R18W, UM
SAN	ANV	57	Facilities occupy 65.41 acres of land leased by FAA from Infalik, Inc., a local native corporation, and the State of Alaska.	Yes	PA 50--2005-0224 SE to Deloy Ges Incorporated; PA 50-2005-0225 SSE to Doyon, Limited
ARSR	SNP	224	Airport site was previously National Marine Fisheries Service (NMFS) property until 1989 when it was turned over to FAA. The radar facility is located on a land parcel leased from the Tanadgusix Native Corporation.	Yes	Although lat/long in water but per FAA's report, site located on Tanadgusix Corporation; IC 149/150, PA 50-90-0669/0670
BLDG	MDO	177	The burned building site is located midway between the Former QS facility and the USAF Radar Station about 200 feet west of the midpoint of the island's airstrip. The Building was burnt down by the USACE in the late 1950's.	Yes	per FAA report, site appears to fall on IC 911/912.

FAC	LOC	FACID	FAC History	Flag	Flag_Notes
CT	BET	59	The former FAA Station No. 146 is located approximately 3.9 miles east of the current station. It is approximately 1,800 acres in size and according to the 1992 PA is owned by the BLM. However, correspondence between FAA and the Bethel Native Corporation.	Yes	ANCSA conveyed IC 142 Bethel Native Corporation; IC 143 Calista Corporation
FSS	GKN	138	The FSS is located Northwest of the intersection of the taxiway and runway. It consists of a control building, three, fifty-foot antenna towers for VHF, UHF, and the concrete foundation of a former fourth tower. A former utility shed is located adjacent to the property.	Yes	PA# 50-2001-0492 - issued to Ahtna, Inc. interim conveyance 10/23/1981
NDB	DUT	110	The NDB/DME facility is located approximately 1,500 feet north/northeast of the airstrip on five acres of land that is leased from Ounalashka Corporation. The facility is built in and near a former World War II military bunker and is situated on the hill.	Yes	ANCSA conveyed IC 014 Ounalashka Corporation; IC 015 The Aleut Regional Corporation
NDB	OME	197	The NDB/H-Marker facility is a 1.72 acre site located a 1/2 mile west of the mouth of the Nome River.	Yes	ANCSA conveyed 50-2012-0151 Sitnasuak Native Corporation; 50-2012-0152 Bering Straits Native Corporation
OLD	ENN	115	The FAA formerly operated a fuel storage facility, a road, and a fuel pipeline on leased property. The site was located adjacent to the railroad tracks and west of the former RCAG facility. The Fuel Storage and Pipeline Facility was constructed to deliver fuel.	Yes	ANCSA PA 50-94-0041/42
OLD	MDO	178	This 9,000-foot, 4" fuel pipeline originally extended from the 375,000-gallon AST at the north end of the island to the USAF WACS facility in the center of the island. As of FY91, the pipeline was breached in several places.	Yes	per FAA report, site on IC 911/912
OLD	UNK	252		Yes	ANCSA Conveyed by IC 493/494
PX	HBK	146	The Primary Engine generator for the site is located near the QS building East, Northeast of the airstrip. This site is owned by the FAA and is the main power for Hinchinbrook airstrip.	Yes	IC 1772 The Eyak Corporation /1773 Chugach Alaska Corporation; title passed 12/9/1998

FAC	LOC	FACID	FAC History	Flag	Flag_Notes
QS	MDO	179	The former quarters area is at the north end of the island, which is only about 600 feet wide in this area. The facility included 14 buildings, including the former RCAG, living quarters, and a generator building, as well as a 375,000-gallon AST.	Yes	per FAA report, site located on IC 911/912
QS	SKW	221	This area was conveyed to CIRI in 1983. In 1985 CIRI then conveyed some of it to AKDOT so that they can use the shop for runway maintenance (runway was also part of the conveyance). In the early 1990's CIRI conveyed the remainder of the QS area.	Yes	per FAA report, IC 632 to CIRI
RCAG	ENN	117	The "RCAG facility" is the same as the Quarters Area at the North Nenana property. The Quarters Area is in the southwest portion of the North Nenana property, on the south-facing side of a large wooded hill sloping down to the Tanana River.	Yes	ANCSA Patent 50-94-0042/41; Nenana
RCAG	GAL	136	The former RCAG facility is on the N bank of the Yukon River, about 4 miles E of the runway and Quarters Area. The building was demolished in FY87. Between FY91 and FY94, the river eroded away some of the site, including several 55-gallon drums.	Yes	PA 50-07-0204/0205 Nulato area, lot 18 USS 6664, Sec 1, T9S., R 10E., KRM cy not on line to verify date; FY 07
SAN	UNK	243	The SAN is a muskeg in the Unalaleet River Foodplain.	Yes	ANCSA Conveyed by IC 1527/1528; PA 50-2004-0462/0463
SAN1	MDO	180	Various areas of the island have been used to dump debris, drums, and miscellaneous equipment. The West Cliff site is located north of the former TACAN facility. The Chugach Alaska Corporation currently owns the property.	Yes	per FAA report, site appears to fall on IC 911/912.
SAN1	MOS	188	The landfill is located southwest of the VOR facility at the west end of the main runway on approximately three acres of land on beach sand. There is some uncertainty as to who is primarily responsible due to historical Military activity in the area.	Yes	50-79-0148, Elim Native Corp, F-20517; Sec. 19(b) of ANCSA - Reservation
SAN2	MOS	264	Area consists of a large number of drums located along the tree line north of Moses Point Station. This land was never part of the withdrawal for the FAA station.	Yes	50-79-0148, Elim Native Corp, F-20517; Sec. 19(b) of ANCSA - Reservation

FAC	LOC	FACID	FAC History	Flag	Flag_Notes
SAN3	MDO	233	<p>Various areas of the island have been used to dump debris, drums, and miscellaneous equipment.</p> <p>The South Cliff site is located on the southeastern side of the island, east of the current FAA operations facility at Building 609.</p>	Yes	per FAA report, site appears to fall on IC 911/912.
SWG	ANC	16	The former wastewater lagoon is located east of the housing unit. The site was identified during the site reconnaissance however precise boundaries could not be delineated.	Yes	ANCSA conveyed IC 1362 Cook Inlet Region, Inc.
TACAN	MDO	181	<p>This former USAF facility is about 500 feet west of the bend in the airstrip and 250 feet east of the western cliff face, in the northern half of the island. It is surrounded by wetlands.</p> <p>In 1964 the USAF withdrawal was going to come to the FAA.</p>	Yes	per FAA report, site appears to fall on IC 911/912.
VEHS	ODK	193	This former tank farm is located near the new garage and former repair shop (Building 605) approximately 500 feet East of the dock. The property is owned by the Natives of Kodiak. Extensive soil contamination remains.	Yes	ANCSA conveyed 50-94-0127 Natives of Kodiak, Incorporated; 50-94-0128 Koniag, Inc., Regional Native Corporation
VOR	MOS	189	The VOR is located approximately a 1/2 mile west of the former FAA station on land leased from the Elim Native Corporation approximately 2,000 feet west of the runway and taxiway intersection. The VOR was built in 1961 to the north of the Moses Point.	Yes	PA 50-79-0148
VOR	WLK	248	No information is available about the VOR. From an aerial photo (Google Maps), it appears that the VOR site is in an isolated wetland area about 1000 ft west of the intersection of the runways.	Yes	ANCSA conveyed 50-82-0141 NANA Regional Corporation, Inc., Successor in Interest to Akuliak Incorporated; 50-82-0142 NANA Regional Corporation, Inc.

FAC	LOC	FACID	FAC History	Flag	Flag_Notes
QS	HBK	147	The Transient Quarters/Shop Site, Building 200 lies East, Northeast of the airstrip. It is used by FAA personnel as emergency personnel housing and a combination garage and shop during monthly maintenance servicing of the station.	Yes	IC 1772 The Eyak Corporation /1773 Chugach Alaska Corporation - title passed 12/9/1998
SAN2	ANC	263	The old Landfill site is located southwest of the USAF site approximately 1,000 feet north of the Little Lake.	Yes	ANCSA Conveyed IC 514 Cook Inlet Regional Corporation
SAN2	CYT	263	SAN-1 is an isolated clearing N of the runway and W of the quarters area. SAN-2 is on the bank of the Duktoth River about 1/2 mile NW of the quarters area; SAN-3 is 130 ft E of SAN-2.	Yes	ANCSA Conveyed PA 50-84-0658 Chugach Natives, Inc.
QS	MOS	187	The QS facility is located north-northeast of the runway and facing it. The QS contains maintenance building 204, and 301, as well as several living buildings.	Yes	50-79-0148, Elim Native Corp, F-20517; Sec. 19(b) of ANCSA - Reservation
QS	ODK	191	Former quarters area, located on the southeast side of the island. The property is now owned by the local Leisnoi Native Corporation.	Yes	ANCSA conveyed 50-86-0067 Leisnoi, Inc.; 50-86-0068 Koniag, Inc. Regional Native Corporation
SAN	SKW	222	Two Historic dumps are located to the west of the runway near the end of a road that went to the RTR and SBRA sites. One dump eroded into the Skwentna River in the mid to late 1960's and its replacement dump was placed into a slough like area.	Yes	per FAA report, IC 632, CIRI
RCO	UNK	242	Maintenance building 205 is located on a .23 acre parcel 250 feet northwest of the Transient Quarters and south of the main airport runway.	Yes	ANCSA conveyed by IC 493/494
SAN1	ANC	15	The old Landfill site is located southwest of the USAF site approximately 1,000 feet north of the Little Lake.	Yes	ANCSA conveyed IC 1347 Cook Inlet Region, Inc.
QS	ENN	116	The North Nenana VHF site (QS area) consisted of two quarters buildings (105, 106), a garage (206), a VHF (403), an EG/shop (602) with two USTs, a water pump house (604), and a 15,000 fuel AST. Ancillary structures included an outdoor cooking area and tower.	Yes	ANCSA Patent 50-94-0041/42

FAA Acronyms**FACILITY TYPE**

ARBCN	Airway Beacon
ARSR	Air Route Surveillance Radar
ARTCC	Air Route Traffic Control Center
ATCT	Airport Traffic Control Tower
BLDG	Buildings
FSS	Flight Service Station
LOC	Localizer
MISC	Miscellaneous - all others
NDB	Non-Directional Radio Homing Beacon
OLD	General Oil Distribution System
QS	Quarters Building
RCAG	Remote Communications Air to Ground
RTR	Remote Transmitter/Receiver
SAN	Sanitation System
VOR	Very High Frequency Omnidirectional Range
VORTAC	VOR Co-located with Tactical Aircraft Control and Navigation

LOCATION

ANC	Anchorage
BET	Bethel
BRW	Barrow
CDB	Cold Bay
CYT	Cape Yakataga
DLG	Dillingham
DUT	Dutch Harbor
ENA	Kenai
ENN	Nenana
GAL	Galena
GKN	Gulkana
HBK	Hinchinbrook
ILI	Illiamna
KSM	St. Marys
MDO	Middleton Island
MOS	Moses Point
ODK	Woody Island, Kodiak
OME	Nome
SKW	Skwenta
SNP	St. Paul
UNK	Unalakleet
WLK	Selawik

APPENDIX E- Corporation Response to 1998 Report and 2014 Update

Approximately 18 Native entities responded to the outreach conducted by the BLM as part of the formulation of the 1998 Report, with 14 entities reporting a total of 65 specific sites. Below in Table 8 is a summary of the 65 sites reported.

Table 9 below entitled "2014 Update on the Sites Reported by ANCSA Corporations in 1998," attempts to provide an update on the status of the sites reported by ANCs as a result of the extensive outreach conducted by the BLM in the preparation of the 1998 Report to Congress on the Settlement of Claims Arising from Hazardous Substance Contamination of Alaska Native Claims Settlement Act Transferred Lands.

Several complicating factors are encountered when trying to provide such an update. The first factor is the lack of specific, or potentially inaccurate, location information. Where land status is not complicated, and an ANC owns all, or most, of a township or section, simply reporting a township or section may be enough to determine whether a site is on land conveyed to an ANC. However, where land status is mixed and complicated, a very specific location description is needed, preferably latitude and longitude, a polygon formed by multiple position locations, or a metes and bounds description.

The BLM used the legal descriptions submitted by the ANCs in the 1998 Report and searched the existing inventory database for matches. Two factors must be considered here: 1) the inventory was in the beginning stages and still incomplete; and 2) many of these sites may have been reported only to the BLM (in the 1998 Report) and may not have been reported to a regulatory agency, such as the Alaska Department of Environmental Conservation. The data obtained from the corporations was added to the inventory database using a centroid, if generic locational information was submitted. For example, if merely a township was listed, the site location was placed in the center of the township. During the stakeholder group meetings, sites were reviewed and either incorporated with a known location from another database (ADEC, FAA, USACE or USAF) or remained for further research.

Table 8: ANCSA Corporation Response to Outreach Survey, 1990's - Results

Legal description does not exist or there are no ANCSA lands in the township	
No match can be found; site may be known only to the ANC	
Legal description is in water, too inexact (or too broad) to locate or needs more research	
Cleanup is complete	
Possible matches can be found within the township/section	

Within the 30 locations reported by ANCs that have a possible match, there may be multiple locations in other databases that are potential matches. The sites listed in red font in Table 8 below indicate the site appears to be on land conveyed to an ANC and the regulatory status appears to be "Active." These sites may be in a clean-up program with verification underway.

Table 9: Information as Reported by ANCSA Corporations in the 1998 Report with Update

Sites in red font indicate the site appears to be on land conveyed to an ANC and the regulatory status appears to still be "Active".

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
1	BERING STRAITS	IGLOO SITE	1N	34W		KRM	One site falls in this township, but appears to be on non-ANCSA ownership (only 3.41 acres of the 22,400 acres in this township are in ANCSA ownership, need a more specific legal description).	USACE site, F10AK0814 - River Air Base	FUDS Eligible	Appears to be on non-ANCSA land.	Cleanup complete, site closed	
2	BERING STRAITS & KING ISLAND	FEATHER RIVER AIRSTRIP	7S	37W	34, 35	KRM	ADEC HAZARD ID #2498, CLEANUP COMPLETE	USACE site, F10AK1008			Cleanup complete, site closed	
2	BERING STRAITS & KING ISLAND	FEATHER RIVER AIRSTRIP	8S	37W	2, 3	KRM	ADEC Hazard ID #2498 matches this name and legal description. The coordinate falls right on the boundary between lands owned by an ANC and lands still in Federal ownership managed by the	USACE site, F10AK1008			Cleanup complete, site closed	

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
							BLM. Cleanup is complete.					
3	BETHEL NATIVE	WHITE ALICE SITE	8N	72W	15	SM	Most sites in this township appear to be on non-ANCSA land, with the exception of the Air Force Installation called Bethel Range	Tract QCD	ADEC Hazard ID # 1868 - Bethel BIA Spill - White Alice Tank; FUDS F10AK0510	ADEC status reported as Cleanup complete with Land Use Controls	Appears to be on non-ANCSA land. Close to boundary; verify coordinate/location	Active Cleanup - USACE
								Section 14, lot 13	Installation: Bethel Range; Site ID: OT099, Site Name: Building Demo/Debris Removal		Appears to be on land conveyed to an ANC.	
								Section 14, lot 13	Installation: Bethel Range; Site ID: SS001; Site Name: POL Storage & Pumping Station RRS		Appears to be on land conveyed to an ANC.	

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
							Section 14, lot 13	Installation: Bethel Range; Site ID: SS010; Site Name: White Alice Site in General		Appears to be on land conveyed to an ANC.		
							Section 14, lot 13	Installation: Bethel Range; Site ID: SS008; Site Name: Thermopiles, Permafrost Conductors		Appears to be on land conveyed to an ANC.		
							Section 14, lot 13	Installation: Bethel Range; Site ID: SS009; Site Name: Contaminated Soil at Various Locations		Appears to be on land conveyed to an ANC.		
							Section 14, lot 13	Installation: Bethel Range; Site ID: SS006; Site Name: East Road Contaminated Soil		Appears to be on land conveyed to an ANC.		

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
								Section 14, lot 13 Installation: Bethel Range; Site ID: SS005; Site Name: North End of Equipment Building		Appears to be on land conveyed to an ANC.		
								Section 14, lot 13 Installation: Bethel Range; Site ID: SS003; Site Name: Antenna, Building		Appears to be on land conveyed to an ANC.		
								Section 14, lot 13 Installation: Bethel Range; Site ID: SS002; Site Name: Vehicle Maintenance Facility RRS		Appears to be on land conveyed to an ANC.		
								Section 14, lot 13 Installation: Bethel Range; Site ID: SS011; Site Name: Barrel Storage		Appears to be on land conveyed to an ANC.		
								Section 14, lot 13 Installation: Bethel Range; Site ID: LF007; Site Name: Old Dump Site Located in		Appears to be on land conveyed to an ANC.		

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
								May 96				
							Section 14, lot 13	Installation: Bethel Range; Site ID: SS013; Site Name: Bethel BIA 27 Acre Site		Appears to be on land conveyed to an ANC.		
							Section 14, lot 13	Installation: Bethel Range; Site ID: 27-Acre; Site Name: BIA 27 Acre Administrative Site		Appears to be on land conveyed to an ANC.		
4	BETHEL NATIVE	CROWLEY MARINE SERVICES	8N	71W	16 SW1/4	SM	Four potential ANCSA sites within this township	Section 17 ADEC HAZARD ID # 2127 BETHEL FUEL SALES	ADEC status is reported as Cleanup Complete	Appears to be on land conveyed to an ANC.		
							Section 15	USACE/ FUDS F10AK0542 BETHEL NG WHSE	FUDS Eligible	Appears to be on land conveyed to an ANC.		

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
							Section 22	USACE/ FUDS F10AK0540 BETHEL 660TH ENGINEERING SITE	Not eligible for FUDS	Appears to be on land conveyed to an ANC.		
							Section 25	USACE/ FUDS F10AK0514 - Bethel AIRPORT	FUDS Eligible	Possibly on land conveyed to an ANC.	Coordinate falls in the Tupuknuk Slough of the Kuskokwim River and needs to be verified but uplands are owned by an ANC so possibly on ANCSA conveyed land.	
5	BETHEL NATIVE	HANGER LAKE	8N	71W	S1/2 SEC 3, N1/2 SEC 10. 'SM	Appears to be in a clean-up program		USACE site, F10AK0541			FUDS property on west side of Hanger Lake, 2 acre site transferred to USFWS	

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
6	BETHEL NATIVE	TODD AIRFIELD	8N	71W	SW1/4 SEC. 16	SM	FUDS F10AK0514 – Bethel Airport					
7	BETHEL NATIVE	TODD AIRFIELD ASPHALT PLANT	8N	71W	PARCEL 1, TRACT A	USS 263 9	Needs more research.				Used by Civil Air Admin. post DoD use of Todd Airfield – NOT part of FUDS F10AK0514	
8	CHUGACH ALASKA	CAPE YAKATAGA TRACT	21S	17E	14, 15, 22, 23	CRM	ADEC ID 2810 = FUDS F10AK0788	Section 22	ADEC Hazard ID # 25322 FAA Cape Yakataga Station Former Tank Farm	ADEC status is reported as Active	This coordinate falls on a boundary line between ANCSA ownership (Chugach Alaska) and lands still in Federal ownership managed by the FAA (Withdrawal for Air Navigation Site 178). Exact location needs to be verified.	East of the FAA Station at the old RR station

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			T	R	Sec	M						
							Section 22	ADEC Hazard ID # 485 FAA Cape Yakatage Station - Sitewide	ADEC status is reported as Informational	Appears to be on land conveyed to an ANC.		
							Section 22	ADEC Hazard ID # 25320 FAA Cape Yakataga Station Off-Runway Drum Disposal Area	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.		
							Section 22	ADEC Hazard ID # 23321 FAA Cape Yakatage State Landfill #1	ADEC status is reported as Cleanup Complete	Appears to be on land conveyed to an ANC.		
							Section 22	ADEC Hazard ID# 25323 FAA Cape Yakataga Station Former Quarters Area	ADEC status is reported as Active	This site appears to fall within lands still in Federal ownership managed by the FAA (Withdrawal for Air Navigation Site 178).		

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
								Section 22 ADEC Hazard ID# 25324 FAA Cape Yakataga Station Former Quarters Area	ADEC status is reported as Active	This site appears to fall within lands still in Federal ownership managed by the FAA (Withdrawal for Air Navigation Site 178).		
								Section 22 FAA Site #263 - SAN2 - CYT	At some level of Site Investigation, Remediation or Monitoring by FAA. Verify with agency.	Appears to be on land conveyed to an ANC.		
9	CHUGACH ALASKA	ICY BAY TRACT	22S	24E	14	CRM	As part of the 2014 inventory, no sites yet found (to-date) to match this description. This could be an example of a site known only to the landowner.					
10	CHUGACH ALASKA	LATOUCHE ISLAND TRACT	1S	9E	27, 33, 34	SM	As part of the 2014 inventory, no sites yet found (to-date) to match this description. This could be an example					

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
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			T	R	Sec	M						
							of a site known only to the landowner.					
11	CHUGACH ALASKA	KNIGHT ISLAND TRACT	3N	10E	13	SM	As part of the 2014 inventory, no sites yet found (to-date) to match this description. This could be an example of a site known only to the landowner.					
12	CHUGACH ALASKA	MIDDLETON ISLAND TRACT	28S	6W	6, 19	CRM	Eleven sites within these two townships (28s6 & 7W); three appear to be on non-ANCSA lands.	Section 7, 8, 17, 18	USACE/ FUDS Site F10AK0158 - Middleton Isl AFS	FUDS Eligible	Appears to be on land conveyed to an ANC.	
								Section 7, 8, 17, 18	FAA Site 178; FAC: OLD; LOC: MDO - 9,000 ft, 4" fuel pipeline	At some level of Site Investigation, Remediation or Monitoring by FAA. Verify with agency.	Appears to be on lands conveyed to an ANC. Coordinate falls in the water, needs to be verified.	

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
							Section 7, 8, 17, 18	FAA Site 179; FAC: QS; LOC: MDO - Former Quarters (North End)	At some level of Site Investigation, Remediation or Monitoring by FAA. Verify with agency.	Appears to be on lands conveyed to an ANC. Coordinate falls in the water, needs to be verified.		
							Section 7, 8, 17, 18	FAA Site 180; FAC: SAN1; LOC: MDO - Various Debris	At some level of Site Investigation, Remediation or Monitoring by FAA. Verify with agency.	Appears to be on lands conveyed to an ANC. Coordinate falls in the water, needs to be verified.		
							Section 7, 8, 17, 18	FAA Site 181; FAC: TACAN; LOC: MDO - Former USAF Facility 500 ft west of bend in airstrip	At some level of Site Investigation, Remediation or Monitoring by FAA. Verify with agency.	Appears to be on lands conveyed to an ANC. Coordinate falls in the water, needs to be verified.		

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			T	R	Sec	M						
								Section 7, 8, 17, 18 FAA Site 177; FAC: BLDG; LOC: MDO - Burned building site	At some level of Site Investigation, Remediation or Monitoring by FAA. Verify with agency.	Appears to be on lands conveyed to an ANC. Coordinate falls in the water, needs to be verified.		
								Section 7, 8, 17, 18 FAA Site 232; FAC: SAAN2; LOC: MDO - Various debris	At some level of Site Investigation, Remediation or Monitoring by FAA. Verify with agency.	Appears to be on lands conveyed to an ANC. Coordinate falls in the water, needs to be verified.		
12	CHUGACH ALASKA	MIDDLETON ISLAND TRACT	28S	7W	13-28	CRM		Section 24 FAA Site 233; FAC: SAN3; LOC: MDO - Various debris	At some level of Site Investigation, Remediation or Monitoring by FAA. Verify with agency.	Appears to be on lands conveyed to an ANC. Coordinate falls in the water, needs to be verified.		
13	EYAK	CRYSTAL FALLS CANNERY	16S	3W	15	CRM	As part of the 2014 inventory, no sites yet found (to-date) to match this					

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
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			T	R	Sec	M						
14	EYAK	SHEPARD POINT CANNERY	14S	3W	25	CRM	description. This could be an example of a site known only to the landowner. As part of the 2014 inventory, no sites yet found (to-date) to match this description. This could be an example of a site known only to the landowner.					
15	EYAK	BOSWELL BAY WHITE ALICE SITE	17S	5W	16	CRM	FUDS F10AK0158	Section 16	FAA Site 147; FAC: QS; LOC: HBK - Transient Quarters Shop Site, Bldg 200	At some level of Site Investigation, Remediation or Monitoring by FAA. Verify with agency.	Possibly on land conveyed to an ANC.	Middleton Island F10AK0158 south 2/3rds of the island is in FUDS program.
								Section 16	FAA Site 146; FAC: PX; LOC: HBK - Primary Engine generator	At some level of Site Investigation, Remediation or Monitoring by FAA. Verify with agency.	Possibly on land conveyed to an ANC.	Middleton Island F10AK0158 south 2/3rds of the island is in FUDS program.

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
							Section 16	FAA Site 144; FAC: VHF; LOC: HBK - Former VHF Facility	At some level of Site Investigation, Remediation or Monitoring by FAA. Verify with agency.	Possibly on land conveyed to an ANC.	Middleton Island F10AK0158 south 2/3rds of the island is in FUDS program.	
16	EYAK	14.5 MILE ARMY INSTALLATION	16S	1W	16	CRM	Thirteen sites fall within this township. Ten of the thirteen appear to be within the Cordova Airport Survey on lands that were conveyed to the State of Alaska in 1966. Three sites are potentially on lands conveyed to an ANC.	Section 22, 23 ADEC Hazard ID # 25271 - Eyak NALEMP Mile 14 Naval Radio Station	ADEC status is reported as Active	Possibly on land conveyed to an ANC.	Additional information is needed; the coordinate falls on a boundary between state and ANCSA lands. Name indicates it may be a site eligible under the Native American Lands Environmental Mitigation Program.	
							Section 16	ADEC Hazard ID# 2443 FAA Cordova	ADEC status is reported as Cleanup	Appears to be on land conveyed to an ANC.		

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014				
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			T	R	Sec	M					
							Station NDB	Complete			
							Section 5, 6	ADEC Hazard ID# 2085 - Cabin Lake Shop Site	ADEC status is reported as Cleanup Complete	Appears to be on land conveyed to an ANC.	
17	EYAK	FAA SITE 7.5 MILE COPPER R. HWY.	15S	2W	33	CRM	Appears there are no ANCSA lands in this township. The lands appeared to have been re-acquired by the United States in April 1999, post the 1978 and 1998 ANCSA conveyances.				
18	GANNA-A'YOO LTD.	USS 2023 OLD GALENA TOWNSITE	9S	10E	6	KRM	As part of the 2014 inventory, no sites yet found (to-date) to match this description. This could be an example of a site known only to the landowner. NOTE: USS 2023 encompasses 4.84 acres and it appears that the ANC conveyed some of				

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
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			T	R	Sec	M						
							that acreage back to the United States. The portion re-conveyed to the United States does not appear to be defined by survey.					
19	GANNA-A'YOO LTD.	DOYON LTD. OIL DRILL HOLE SITE	10S	1E	1	KRM	As part of the 2014 inventory, no sites yet found (to-date) to match this description and no ANCSA lands within this township. If the identification of 1E is a typo and 10E was meant, there are also no sites identified is 10S10E.					
20	GANNA-A'YOO LTD.	RODO RIVER CAA STATION	14S	1E	16, 17	KRM	As part of the 2014 inventory, no sites yet found (to-date) to match this description. This could be an example of a site known only to the landowner.					

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			T	R	Sec	M						
21	GANNA-A'YOO LTD.	PREVIOUS CATHOLIC CHURCH LANDS	9S	4E	9	KRM	Five sites within this township, none fall within section 9. Of the five, two appear to fall on non-ANCSA lands and three sites appear to be potentially on lands conveyed to an ANC.	Section 23	USACE/ FUDS Site F10AK0178 - Nulato Radio Station	FUDS Eligible	Appears to be on land conveyed to an ANC.	
								Section 5	ADEC Hazard ID 4583 - private residence	ADEC status reported as Cleanup Complete with Land Use Controls	Appears to fall on non-ANCSA land, on PA 50-76-0222 to Nulato Townsite	
								Section 8	ADEC Hazard ID # 717 - Yukon-Koyukuk School District	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.	
								Section 8	ADEC Hazard ID # 3948 - Andrew K. Demoski School	ADEC status is reported as Active	Appears to be on non-ANCSA land, on PA 50-76-0222 to Nulato Townsite	

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			T	R	Sec	M						
								Section 8	ADEC Hazard ID # 3672 - Nulato Fuel Line Spill	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.	
22	GAN A-A'YOO LTD.	OLD ALASKA VILLAGE ELECTRIC SITE	9S	4E	9	KRM	See information listed for site called "Previous Catholic Church Lands"					
23	GAN A-A'YOO LTD.	OLD NATIONAL GUARD ARMORY	9S	4E	9	KRM	See information listed for site called "Previous Catholic Church Lands"					
24	GAN A-A'YOO LTD.	NULATO CITY DUMP	9S	4E	9	KRM	See information listed for site called "Previous Catholic Church Lands"					
25	GAN A-A'YOO LTD.	OLD PUBLIC HEALTH SERVICE SITE	9S	4E	8	KRM	See information listed for site called "Previous Catholic Church Lands"					
26	GAN A-A'YOO LTD.	KALTAGE CITY DUMP	13S	1E	31	KRM	Four sites fall in this township in Sections 29 and 32 (nothing in Section 31). Two sites appear to fall within USS 2027, Tract A which was conveyed to a non-ANCSA land owner prior to the	Section 29	ADEC Hazard ID # 3231 - Kaltag Former Bulk Storage Co-Op Tank Farm	ADEC status is reported as Active	Coordinate needs to be checked as it falls in the Yukon River	

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
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			T	R	Sec	M						
							passage of ANCSA.					
								Section 29	USACE site - F10AK1040 - Kaltag Weather Station	Not eligible for FUDS	Appears to be on non-ANCSA land; Appears to be within USS 4485, a non-ANCSA patent (50-76-0275) for the Kaltag Townsite.	
								Section 32	ADEC Hazard ID # 289 - Kaltag School Oil Seep	ADEC status is reported as Active	Appears to be on non-ANCSA land; Appears to be within USS 2027, Tract A which was conveyed to a non-ANCSA land owner prior to the passage of ANCSA	
								Section 32	ADEC Hazard ID # 26101 - Kaltag School Former BIA Tank Farm	ADEC status is reported as Active	Appears to be on non-ANCSA land; Appears to be within USS 2027, Tract A which was conveyed to a non-ANCSA land owner prior to the passage of ANCSA	

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			T	R	Sec	M						
27	GAN A-A'YOO LTD.	KOYUKUK DUMP SITE	7S	6E	13	KRM	Three sites fall within this township, all in Section 17. Two appear to be on non-ANCSA lands within USS 4488. It appears only one site may be on lands conveyed to an ANC and for that site, ADEC status is reported as Cleanup Complete. This site location needs to be verified as it falls within the Yukon River near ANCSA owned uplands.	Section 17	ADEC Hazard ID # 4349 - ADOT & Public Facilities Snow Removal Equipment Bldg - Koyukuk	ADEC status is reported as Cleanup Complete	Possibly on land conveyed to an ANC.	
28	GAN A-A'YOO LTD. ****	U.S. ABANDONNE D TELEGRAPH LINE	13S**	1E** *	1	KRM	Needs more research; multiple townships involved. T13S, R1E through T8S, R10E, KRM					
29	GAN A-A'YOO LTD.	ALASCOM TOWER SITE	9S	10E		KRM	Multiple sites fall in this township but most appear to be on non-ANCSA land. One site in Section 1 appears to be on land conveyed to an	Section 1	FAA Site 136; FAC: RCAG; LOC: GAL	At some level of Site Investigation, Remediation or Monitoring by FAA.	Appears to be on land conveyed to an ANC.	

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
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			T	R	Sec	M						
							ANC.		Verify with agency.			
30	GANA-A'YOO LTD./LOUDEN VILLAGE COUNCIL	MILLION GALLON HILL	9S	10E		KRM	See information listed for site called "Alascom Tower Site"					
31	GANA-A'YOO LTD./LOUDEN VILLAGE COUNCIL	CAMPION WHITE ALICE SITE	9S	11E		KRM	See information listed for site called "Barge Landing Area"					
32	GANA-A'YOO LTD./LOUDEN VILLAGE COUNCIL	BARGE LANDING AREA	9S	11E		KRM	Fifteen sites fall in this township but all appear to be on non-ANCSA land.	USS 7401, Lot 22	ADEC Hazard ID # 552 - Campion AFS RRS - Pol Area ST007	ADEC status is reported as Active	Appears to be on non-ANCSA land, within an existing military withdrawal	
								USS 7401, Lot 22	ADEC Hazard ID # 560 - Campion Air Force Site RRS - Sitewide	ADEC status is reported as Active	Appears to be on non-ANCSA land, within an existing military withdrawal	
								USS 7401, Lot 22	Installation: Campion Air Force Station; Air Force Site ID SS002 ; Site Name: Waste		Appears to fall on non-ANCSA land, within an existing military withdrawal	

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			T	R	Sec	M					
								Accumulation Area 1			
							USS 7401, Lot 22	Installation: Campion Air Force Station; Air Force Site ID LF005; Site Name: Landfill No. 2		Appears to fall on non-ANCSA land, within an existing military withdrawal	
	GANNA-A'YOO LTD./LOUDEN VILLAGE COUNCIL	BARGE LANDING AREA (Cont.)					USS 7401, Lot 22	Installation: Campion Air Force Station; Air Force Site ID LF004 ; Site Name: Landfill No. 1		Appears to fall on non-ANCSA land, within an existing military withdrawal	
							USS 7401, Lot 22	Installation: Campion Air Force Station; Air Force Site ID ST007 ; Site Name: POL Storage Area		Appears to fall on non-ANCSA land, within an existing military withdrawal	
							USS 7401, Lot 22	Installation: Campion Air Force Station; Air Force Site ID SS009 ; Site		Appears to fall on non-ANCSA land, within an existing military withdrawal	

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
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			T	R	Sec	M						
								Name: Road Oiling				
							USS 7401, Lot 22	Installation: Campion Air Force Station; Air Force Site ID OT001 ; Site Name: Long Range Radar Station		Appears to fall on non-ANCSA land, within an existing military withdrawal		
							USS 7401, Lot 22	Installation: Campion Air Force Station; Air Force Site ID SS008 ; Site Name: Barge Landing Area		Appears to fall on non-ANCSA land, within an existing military withdrawal		
							USS 7401, Lot 22	Installation: Campion Air Force Station; Air Force Site ID SS003 ; Site Name: Waste Accumulation Area 2		Appears to fall on non-ANCSA land, within an existing military withdrawal		

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
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			T	R	Sec	M						
								USS 7401, Lot 22 Installation: Campion Air Force Station; Air Force Site ID OT006 ; Site Name: White Alice Site		Appears to fall on non-ANCSA land, within an existing military withdrawal		
								USS 7401, Lot 22 Installation: Campion Air Force Station; Air Force Site ID AL908; Site Name: Suspected Former Rocket Range		Appears to fall on non-ANCSA land, within an existing military withdrawal		
								USS 7401, Lot 22 Installation: Campion Air Force Station; Air Force Site ID SR910; Site Name: Possible Informal Shooting Area		Appears to fall on non-ANCSA land, within an existing military withdrawal		
								USS 7401, Lot 22 Installation: Campion Air Force Station; Air Force Site ID SR909; Site		Appears to fall on non-ANCSA land, within an existing military withdrawal		

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
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			T	R	Sec	M						
								Name: Possible Small Arms Range				
								USS 7401, Lot 24 Installation: Campion Air Force Station; Air Force Site ID OD001; Site Name: Campion Open Burn Open Detonation		Appears to fall on non-ANCSA land, within an existing military withdrawal		
33	GANA-A'YOO LTD./LOUDEN VILLAGE COUNCIL	BEAVER CR. DRUM DISPOSAL	9S	11E		KRM	See information listed for site called "Barge Landing Area"					
34	GANA-A'YOO LTD./LOUDEN VILLAGE COUNCIL	KALAKAKET CREEK ASBESTOS	12S	10E		KRM	No lands conveyed to an ANC within this township					
35	GANA-A'YOO LTD./LOUDEN VILLAGE COUNCIL	CAMPION POL AREA	9S	11E		KRM	See information listed for site called "Barge Landing Area"					

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
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			T	R	Sec	M						
36	GANA-A'YOO LTD./LOUDEN VILLAGE COUNCIL	BOMB IMPACT AREA #1	8S	7E		KRM	As part of the 2014 inventory, no sites yet found (to-date) to match this description. This could be an example of a site known only to the landowner. NOTE: The majority of the lands within this township are non-ANCSA lands. Only 208.62 acres of the 18,941.41 acres in this township are conveyed to an ANC.					
37	GANA-A'YOO LTD./LOUDEN VILLAGE COUNCIL	CROW CREEK FUEL SPILL	8S	10E		KRM	Two sites within this township that appear to be on lands conveyed to an ANC (but do not match this site name).	USS 6664, Lot 19	ADEC Hazard ID #729 - FAA Galena	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.	
								USS 6664, Lot 4	ADEC Hazard ID #541 - Galena High School	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.	
38	GANA-A'YOO LTD./LOUDEN VILLAGE COUNCIL	BIA TANK FARM	9S	10E		KRM	See information listed for site called "Alascom Tower"					

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			T	R	Sec	M					
							Site"				
39	GAN A-A'YOO LTD./LOUDEN VILLAGE COUNCIL	DRUM DIST. AREA	YUKON RIVER DOWNSTREA M				Needs more research. Inexact location.				
40	GAN A-A'YOO LTD./LOUDEN VILLAGE COUNCIL	SOUTHWEST DUMP	9S	10E		KRM	See information listed for site called "Alascom Tower Site"				
41	GWITCHYAA ZHEE	GZ UTILITY POWER HOUSE	20N	12E	18	FM	As part of the 2014 inventory, no sites yet found (to-date) to match this description. This could be an example of a site known only to the landowner. However, there are several sites in this township. The sites falling within sections 17 and 18 all appear to be located on non-ANCSA land. There are sites that appear to be on ANCSA lands within sections 7 and 8.				

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
								Section 7 ADEC Hazard ID # 1391 - FAA Fort Yukon VORTAC	ADEC status is reported as Cleanup Complete	Appears to be on land conveyed to an ANC.		
								Section 8 ADEC Hazard ID # 1603 - FAA Fort Yukon Quarters Facility Incinerator	ADEC status is reported as Cleanup Complete	Appears to be on land conveyed to an ANC.		
								Section 8 ADEC Hazard ID # 25393 - FAA Fort Yukon Quarters Facility Bldg. 300 Interior Sump	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.		
								Section 8 ADEC Hazard ID # 25394 - FAA Fort Yukon Quarters Facility Bldg 601 UST 9-C-5	ADEC status is reported as Cleanup Complete	Appears to be on land conveyed to an ANC.		
								Section 8 ADEC Hazard ID # 25395 - FAA Fort Yukon	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.		

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
								Quarters Facility Bldg. 601 Interior Sump				
							Section 8	ADEC Hazard ID # 25396 - FAA Fort Yukon Quarters Facility Bldg 100 UST 9-C-7	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.		
							Section 8	ADEC Hazard ID # 25397 - FAA Fort Yukon Quarters Facility Bldg 100 UST 9-C-6	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.		
							Section 8	ADEC Hazard ID # 25398 - FAA Fort Yukon Quarters Facility Bldg 103 UST 9-C-8	ADEC status is reported as Cleanup Complete	Appears to be on land conveyed to an ANC.		
							Section 8	ADEC Hazard ID # 1640 - FAA Fort Yukon H Marker Fac.	ADEC status is reported as Cleanup Complete	Appears to be on land conveyed to an ANC.		

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
								Section 8 ADEC Hazard ID #1639 - FAA Fort Yukon RCAG	ADEC status is reported as Cleanup Complete	Appears to be on land conveyed to an ANC.		
42	HUNA TOTEM	HOONAH RADIO RELAY STATION	43S	61E	21, 22	CRM	Eight sites fall within this township and seven of them appear to be on lands conveyed to an ANC.	Section 21 ADEC Hazard ID # 25730 - Hoonah RRS - EA 8 - PCB Soil Stockpile Area	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.	See USACE/FUDS site number F10AK0122	
								Section 21 ADEC Hazard ID # 25731 - Hoonah RRS - EA 8 - Septic Outfall	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.	See USACE/FUDS site number F10AK0123	
								Section 21 USACE/ FUDS number F10AK0122 for Hoonah RRS	FUDS Eligible	Appears to be on land conveyed to an ANC.	At this time it is not known if the USACE/ FUDS site F10AK0122 is a duplicate of, or encompasses, ADEC Hazard ID numbers 25730 and 25731.	

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
							Section 22	ADEC Hazard ID#25732 - Hoonah RRS - EA 9 - Debris Disposal Area	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.		
							Section 28	ADEC Hazard ID# 2693 - L Kane Hoonah Tank Farm	ADEC status is reported as Active	Appears to be on non-ANCSA land.		
							Section 28	ADEC Hazard ID# 1452 - Hoonah RRS - Main Cantonment	ADEC status is reported as Cleanup Complete	Appears to be on land conveyed to an ANC.		
							Section 28	ADEC Hazard ID# 3267 - AT&T Alascom Hoonah Relay	ADEC status is reported as Cleanup Complete	Appears to be on land conveyed to an ANC.		
							Section 32	ADEC Hazard ID # 589 - Whitestone Camp and Sort Yard - (in Section 32).	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.	Records indicate this may be post-conveyance contamination . ADEC has identified Sealaska Timber	

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
											Corporation and Whitestone Logging as PRPs.	
43	KAVILCO INC.	HADLEY /CLINKER & SMELTER	73S	86E	13	CRM	One site falls within this legal description; USACE/FUDS number F10AK0153 - Lyman Anch ACS Subcabl. This is an eligible FUDS site that appears to be in an existing clean-up program.	Section 13	USACE/ FUDS number F10AK0153 - Lyman Anch ACS Subcab	FUDS Eligible	Appears to be on land conveyed to an ANC.	
44	KONIAG	BRUHN POINT			LOT 34, USS 2539		One site matches this description/location	USS 2539, Lot 34	USACE/ FUDS F10AK0901 - Bruhn Pt. (Kodiak Isl.)	FUDS eligible	Appears to be on land conveyed to an ANC.	Appears to be in a clean-up program

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
45	KONIAG	USS 2539			LOTS 15 AND 23		<p>ADEC HAZARD ID #1582 - Kodiak - Buskin Beach Asphalt DA falls within USS 2539, lot 15. This site appears to be on land conveyed to an ANC. There are no sites that appear to fall within USS 2539, lot 23 at this time.</p> <p>There is a site that falls in USS 2359, lot 16, very close to the boundary of lot 23 of USS 2359. This site is ADEC Hazard ID 3054 - USCG Lake Louise Drive Release - ADEC status is reported as cleanup complete and this site is within a military withdrawal and is non-ANCSA land.</p>	USS 2539, Lot 15	ADEC HAZARD ID #1582 - Kodiak - Buskin Beach Asphalt DA	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.	FUDS F10AK0902, USACE coordinates need verification

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
46	KONIAG	LONG ISLAND	28S	18W		SM	One site appears to match this description. It is ADEC Hazard ID # 55 - Kodiak - Long Island (Ft. Tidball) - ADEC status is reported as Active. This name matches a site name in a USACE/FUDS clean-up program (F10AK0280 Fort Tidball/Long Island) and it appears they could be duplicates, however additional location information (USACE coordinate falls in Chiniak Bay) and site description information from the USACE and ADEC would be needed in order to determine whether or not these are duplicates.				FUDS Program has site centroid as 57.7651/ - 152.266. Entire island was cleaned up under the FUDS Program and per ADEC has a signed Decision Document for no further action.	
47	KONIAG	CHINIAK TRACKING STATION	29S	18W		SM	Two sites fall within this township and both appear to be on land conveyed	Section 34	ADEC Hazard ID # 54 - Kodiak - Cape Chiniak	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.	

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
							to an ANC.		Tracking Station			
								Section 34	ADEC Hazard ID # 183 - Kodiak - Little Navy Annex	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.	
47	KONIAG	CHINIAK TRACKING STATION	39S	18W		SM	This township does not exist.					
48	KONIAG	NAVY RECREATION CAMP	24S	22W	16	SM	Two sites fall within this township and both appear to be on land conveyed to an ANC.	Section 16	ADEC Hazard ID # 3466 - Afognak Island Coastal Defense Site same as FUDS F10AK0041	ADEC status is reported as Active	Appears to be on land conveyed to an ANC.	
								Section 16		FUDS Eligible	Appears to be on land conveyed to an ANC.	
49	KUSKOKWIM	RED DEVIL MINE	19N	44W	5, 6, 7, 8	SM	Selected lands. Currently in Remedial Investigation & Feasibility Study phase of CERCLA.				Selected land, not conveyed.	

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
50	NATIVES OF KODIAK, INC	WOODY ISLAND, ICEHOUSE POINT	LAT 47N46'		LONG 152W22'		Needs more research. Coordinate falls in the Gulf of Alaska					
51	NATIVES OF KODIAK, INC	SWAMPY ACRES FORMER FT. GREELY	LAT 57N 45'		LONG 152W 30'		Coordinates need verification	FUDS F10AK 0285				Active project
52	OUNALASHKA	MARGARET BAY SUBDIVISION TRACT D	73S	118W	3	SM	Needs more research. Description appears to be based on a state plat. Appears Section 3 is predominately ANCSA land.					
53	OUNALASHKA	MARGARET BAY SUBDIVISION TRACT C	73S	118W	3	SM	Needs more research. Description appears to be based on a state plat. Appears Section 3 is predominately ANCSA land.					
54	OUNALASHKA	MARGARET BAY SUBDIVISION LOT 6 B2	73S	118W	3	SM	Needs more research. Description appears to be based on a state plat. Appears Section 3 is predominately					

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
							ANCSA land.					
55	OUNALASHKA	MARGARET BAY SUBDIVISION TRACT A	73S	118W	3	SM	Needs more research. Description appears to be based on a state plat. Appears Section 3 is predominately ANCSA land.					
56	OUNALASHKA	MARGARET BAY SUBDIVISION LOT 1 & 2	73S	118W	3	SM	Needs more research. Description appears to be based on a state plat. Appears Section 3 is predominately ANCSA land.					
57	OUNALASHKA	MARGARET BAY SUBDIVISION LOT 1 BL1	73S	118W	3	SM	Needs more research. Description appears to be based on a state plat. Appears Section 3 is predominately ANCSA land.					
58	OUNALASHKA	FT. LEONARD-EIDER POINT					Legal descriptions too vague to locate	FUDS properties				

2014 Update on the Sites Reported by ANCSA Corporations in 1998							Preliminary Findings in 2014					
Order As Listed in 1998	CORPORATION	SITE NAME	LOCATION/LEGAL DESCRIPTION				STATUS AS OF 2014 INVENTORY		Site Number/Name	Status as Reported by State or Federal Agency	Land Status	Status
			T	R	Sec	M						
59	OUNALASHKA	FORT SCHWATKA-ULAKTA HEAD					Legal descriptions too vague to locate	FUDS properties				
60	OUNALASHKA	FORT BRUMBACK-SUMMER BAY					Legal descriptions too vague to locate	FUDS properties				
61	OUNALASHKA	HILL "400"					Legal descriptions too vague to locate	FUDS properties				
62	OUNALASHKA	CONSTANTINE BAY					Legal descriptions too vague to locate	FUDS properties				
63	OUNALASHKA	FORT MEARS					Legal descriptions too vague to locate	FUDS properties				
64	OUNALASHKA	UNALASKA GARRISON					Legal descriptions too vague to locate					
65	TANADGUSIX	MULTIPLE SITES - ST. PAUL ISLAND					Legal descriptions too vague to locate					

Notes: Numbers assigned only to indicate the order these sites appeared in Appendix A of the 1998 Report and for ease of comparison against their status in 2014. They do not represent a "Site Number" as assigned by a regulatory agency or an agency assuming the cleanup.

Sites in red font indicate the site appears to be on land conveyed to an ANC and the regulatory status appears to still be "Active". Verification is underway.

APPENDIX F – Examples of Site Complexity

Anvil Mountain Radio Relay Station

The Anvil Mountain Radio Station was established and operated by the U.S. Air Force (USAF). The station consisted of a complex of structures and support features, some of which are associated with known past releases of contaminants. The records summarized below were compiled from datasets maintained by the USAF, Alaska Department of Environmental Conservation (ADEC), and the U.S. Army Corps of Engineers (USACE) Formerly Used Defense Site (FUDS) group. As this table illustrates, each agency uses a different nomenclature for identifying and naming specific features. Further, the currently available spatial data consists of a single point, which does not support estimating the size and shape of each feature. More information is needed to establish the actual location of each feature, and how it may relate to nearby conveyed land.

Source	Site ID	Site Name	Latitude	Longitude	Status*
USAF	DB009	OT099	35.341204	(94.369701)	
USAF	OT099	Building Demolition/Debris Removal (Not Reported)	64.561700	165.386400	
USAF	OT001	Overall Installation (Administratively Closed)	64.561700	165.386400	
USAF	SS002	Vehicle Maintenance Shop	64.561700	165.386400	
USAF	SS004	Saddle Tank Area	64.561700	165.386400	
USAF	SS005	Tank Foundation Area Spill	64.561700	165.386400	
USAF	SS006	Contaminated Ditch	64.561700	165.386400	
USAF	SS007	Saddle Tank Area	64.561700	165.386400	
USAF	SS008	Ground Storage Tank Spill	64.561700	165.386400	
USAF	SS003	Electrical Rm Spill	64.561700	165.386400	
Source	Hazard ID	Site Name	Latitude	Longitude	Status
ADEC	844	Anvil Mt. White Alice Site	64.563917	-165.375889	Active
Source	FUDS_No.	Property Name	Latitude	Longitude	Status
FUDS	F10AK1018	Anvil Mountain AWS	64.545	-165.3872222	FUDS (closed)

*The U.S. Air Force preliminary data provided did not include status

Barter Island

The USAF developed and operated a Defense Early Warning (DEW) line station at Barter Island that eventually was transformed into a Long Range Radar Station. The station consisted of a complex of structures and support features, some of which are associated with known past releases of contaminants. The records summarized below were compiled from datasets maintained by the USAF, the ADEC, and the FUDS group. As was the case with Anvil Mountain, each agency uses a different nomenclature for identifying and naming specific features, and the spatial data are limited to a single point for each feature. More information is needed to establish the actual location of each feature, and how it may relate to nearby conveyed land. Additional information is also needed to address the following questions:

1. The ADEC records indicate the Hangar Area (SS022) and Refueling Area (CG002) are active sites. The regulatory status of the other USAF features is not known; and

2. The regulatory status of FUDS and USAF features, other than the hangar and refueling area, is not known.

Source	Site ID	Site Name	Latitude	Longitude	Status	City
USAF	OT005	Radio Relay Area - duplicate site	35.341204	(94.369701)		
USAF	OT006	Fuel Tank - duplicate site	35.341204	(94.369701)		
USAF	LF007	Old Dump Site - duplicate site	35.341204	(94.369701)		
USAF	ST010	POL Storage Tanks - duplicate site	35.341204	(94.369701)		
USAF	LF009	Old Dump Area NW	35.341204	(94.369701)		
USAF	LF012	Old Runway Dump	35.341204	(94.369701)		
USAF	LF019	Old Dump Site - duplicate site	35.341204	(94.369701)		
USAF	SD008	Contaminated Ditch	70.130800	143.634200	Air Force	
USAF	SS015	Weather Station	70.130800	143.634200	Air Force	
USAF	SS020	Bladder Diesel Spill	35.341204	(94.369701)		
USAF	OT099	Building Demolition/Debris Removal	70.130800	143.634200	Air Force	
USAF	SS021	JP-4 Spill	70.130800	143.634200	Air Force	
USAF	SS017	POL Tanks	70.130800	143.634200	Air Force	
USAF	ST018	Fuel Tanks	70.130800	143.634200	Air Force	
USAF	SS016	White Alice Facility	35.341204	(94.369701)		
USAF	LF003	POL Catchment	35.341204	(94.369701)		
USAF	SS011	Air Terminal Fuel Storage	70.130800	143.634200	Air Force	
USAF	CG002	Refueling Area	35.341204	(94.369701)		
USAF	LF001	Old Landfill (new location)	35.341204	(94.369701)		
USAF	LF004	Compliance Landfill	35.341204	(94.369701)		
USAF	SS013	Heated Storage	70.130800	143.634200	Air Force	
USAF	SS014	Garage	70.130800	143.634200	Air Force	
USAF	SS022	Hanger Area	70.881200	143.352214	Air Force	
Source	Hazard ID	Site Name	Latitude	Longitude	Status	City
ADEC	4222	Barter Island LRRS Refueling Area (CG002)	70.135278	-143.595833	Active	Kaktovik
ADEC	4229	Barter Island LRRS Hangar	70.135278	-143.592222	Active	Kaktovik
Source	FUDS Number	Property Name	Latitude	Longitude	Status	City
FUDS	F10AK0277	Barter Island NGS	70.13416667	-143.5861111	FUDS	Kaktovik
FUDS	F10AK0995	Barter Island DEW Station	70.11694444	-143.6669444	Conveyed	Kaktovik

FAA Moses Point Station

The information obtained for the Federal Aviation Administration (FAA) station at Moses Point illustrates the differences in nomenclature between the ADEC and the FAA, and regulatory complexity. The FAA records indicate that the status of each feature is No Further Remedial Action Planned (NFRAP) due to technical and infeasibility of further remediation. Any additional remedial action would require demolition of a building that is still in use. The BLM records indicate the station occupies land that has been conveyed to the Elim Native Corporation and the FAA leases the facility from the corporation.

Source	Hazard ID	Site Name	Latitude	Longitude	Status	City
ADEC	803	FAA Moses Pt. Fuel Storage Area	64.698056	-162.057222	Active	Elim
ADEC	804	FAA Moses Pt. Maint./Vehicle Fac.	64.698056	-162.057222	Active	Elim
ADEC	805	FAA Moses Pt. Septic/Sewage Fac.	64.698056	-162.057222	Active	Elim
ADEC	807	FAA Moses Pt. VORTAC Burns 1 & 2	64.698056	-162.057222	Active	Elim
	848	FAA/FUDS Joint Cleanup	64.693257	-162.085132	Closed	Elim
Source		Property Name	Latitude	Longitude	Status	City
FAA		FAA Moses Pt. VOR			NFRAP	Elim
FAA		FAA Moses Pt. DME			NFRAP	Elim
FAA		FAA Moses Pt. NDB			NFRAP	Elim
FAA		FAA small garage (Elim Runway)			NFRAP	Elim

APPENDIX G – Attendees for Work Plan Introduction & Implementation Meetings

April 27, 2015 – General Alaska Native Corporation Meeting Attendees

Emy Matz, Doyon	Ellen Lander, Doyon
Therese Clark, Olgoonik Corporation	Nichola Rudy, ANVCA
Jason Brune, CIRI	Bruce Anders, CIRI
Kim Reitmeier, ANCSA Regional Association	Mainon Schwartz, ASRC
Jeff Nelson, NANA	Steve Connelly, Eklutna, Inc.
Lawrence Gaffney, Huna Totem Corporation	Daniel Cheyette, BBNC
Tiel Smith, ASRC	Erik Kenning, ASRC
Ethan Schutt, CIRI	Larry Pederson, BBNC
June McAtee, Calista	Mary Martinez, Calista
David Gregoro, Dunalaska Corporation	Tom Panamaroff, Koniag, Inc.
Jeff Philliip, Doyon	David Phillips, Chugach AK Corporation
Connie J. Downing, Tyonek Native Corp.	Brennan Cain, Eyak Corporation
David Kroto, Tyonek Native Corp.	Jackie Moeller, Ouzinkie (phone)
Andrea Gusty, Kuskokwim Corp.	Jim Arnesen, Eklutna, Inc.
Michele Metz, Sealaska	Ralph Eluska, BLM
Paul Krabacher, BLM	KJ Mushovic, BLM
David Mushovic, BLM	Cory Black, BLM
Mike McCrum, BLM	Ramona Chinn, BLM
Alan Bittner, BLM	

April 29, 2015 – Chugach, N.A.N.A., Ahtna and Koniag Regional Corporation Attendees

David Anderson, Natives of Kodiak	Phillip Johnson, DOI
Jana Turvey, Leisnoi Inc.	John Halverson, ADEC
Brian Duffy, Kikiktugruk Inupiat Corporation	Sarah Lukin, Pt Capital for NOK
David Phillips, Chugach	Jim Erickson, Natives of Kodiak
Jennifer Roberts, ADEC	Steve Mattson, USAF
Jerome Montague, SOC ALCOM	Matt Vandaele, Koniag

Joe Bovee, Ahtna

Brennan Cain, Eyak

Matt Lux, BLM

Ralph Eluska, BLM

Cory Black, BLM

Ramona Chinn, BLM

Paul Krabacher, BLM

KJ Mushovic, BLM

David Mushovic, BLM

Mike McCrum, BLM

June 9, 2015 – NANA (agency review), Arctic Slope and Bristol Bay Corporation areas:

Scott Nish, Kuukpik

Phillip Johnson, DOI

Katelyn Heflin, DOI

John Halverson, ADEC

Richard Ragle, USACE

Brad Platt, FAA

Theresa Clark, Olgoonik

Mischa Ellanna, BBNC

Keith Torrance, UIC/Umiaq

Steve Mattson, AFCEC

Tiel Smith, ASRC

Bartz Englishoe, APC

Daniel Cheyelte, BBNC

Kim Jorgensen, UIC (phone)

Miriam Aiken, UIC (phone)

Fannie Soplun, KIC (phone)

Ralph Eluska, BLM

Cory Black, BLM

Matt Lux, BLM

Ramona Chinn, BLM

David Mushovic, BLM

Loch Anderson, BLM

Paul Krabacher, BLM

July 21, 2015 – Sealaska Corporation area:

Michelle Metz, Sealaska

Phillip Johnson, DOI

Richard Ragle, USACE

Brad Platt, FAA

Steve Mattson, AFCEC

Ralph Eluska, BLM

Cory Black, BLM

Matt Lux, BLM

Ramona Chinn, BLM

Paul Krabacher, BLM

July 21, 2015 – Calista Corporation:

Sharon McClintock, BNC

Mary Martinez, Calista

Phillip Johnson, DOI

Richard Ragle, USACE

Brad Platt, FAA

Ralph Eluska, BLM

Matt Lux, BLM

Loch Anderson, BLM

July 21, 2015 – Bering Straits Corporation:

Morris D. Nassuk, KNC

Leo Charles, Koyuk Native Corporation

Rebecca Anasogak, Koyuk Native Corporation

Sharon McClintock, BNC

Ralph Eluska, BLM

Matt Lux, BLM

Loch Anderson, BLM

Paul Krabacher, BLM

Nicole Johnson White Mtn and Brevig Mission NC*

*phone

August 25, 2015 – Doyon Corporation:

Larry Lau, Tozitna

Ray Richards, Doyon

Barbara Barnett, Zho-Tse

James Aallen, Northway Native

Jack Vanhatten, Stevens Village

Richard Ragle, USACE

Phillip Johnson, DOI

John Halverson, ADEC

Matt Lux, BLM

Dick Thwaites, BLM

Blanche Sam, K'oyitl'ots'ina (phone)

Paul Krabacher, BLM

Steve Mattson, AFCEC

Cory Black, BLM

Ramona Chinn, BLM

Paul Krabacher, BLM

Richard Ragle, USACE

Steve Mattson, AFCEC

Phillip Johnson, DOI

Brad Platt, FAA

Cory Black, BLM

Ramona Chinn, BLM

Eileen Bryant, BLM

Larry Pederson, Bering Straits Corporation*

Robert Brean, Tanacross

Jennifer John, Zho-Tse

Altona Rathbun, Baan O Yeel Kon

Emma Hildebrand, Northway Native

Michael Kelly, Stevens Village

Steve Mattson, AFCEC

Brad Platt, FAA

Cory Black, BLM

Christy Favorite, BLM

Ralph Eluska, BLM

Kevin Whitworth, MTNT (phone)

August 25, 2015 – Cook Inlet Region, Incorporated:

Connie Downing, Tyonek

Bruce Anders, CIRI

Richard Ragle, USACE

Phillip Johnson, DOI

John Halverson, ADEC

Matt Lux, BLM

Paul Krabacher, BLM

September 1, 2015 – Aleut:

Rick Miller, Ounalashka

Melvin Smith, Aleut

Patricia Lekanoff Gregory, Aleut/Ounalashka

Richard Ragle, USACE

Phillip Johnson, DOI

John Halverson, ADEC

Matt Lux, BLM

Mike McCrum, BLM

Dina Ginn, NAVFAC NW (phone)

David Kroto, Tyonek

Jason Brune, CIRI

Steve Mattson, AFCEC

Brad Platt, FAA

Cory Black, BLM

Christy Favorite, BLM

Ralph Eluska, BLM

Julie Shane, TDX

Vincent Tutiakoff, Aleut/Ounalashka

David Gregory, Ounalashka

Steve Mattson, AFCEC

Doug Campbell, FWS

Cory Black, BLM

Ralph Eluska, BLM

Paul Krabacher, BLM