

ILIAMNA-NONDALTON ROAD IMPROVEMENTS

Project No. STP-0214(3)/51951

REVISED ENVIRONMENTAL ASSESSMENT and FINDING OF NO SIGNIFICANT IMPACT

December 2001



Prepared by:

*State of Alaska
Department of Transportation
and Public Facilities*

For:

Federal Highway Administration

FEDERAL HIGHWAY ADMINISTRATION

FINDING OF NO SIGNIFICANT IMPACT

for

Iliamna-Nondalton Road Improvements

Project No. STP-0214(3)/51951

Purpose and Need:

The State of Alaska, the communities of Iliamna, Newhalen and Nondalton, and the Lake and Peninsula Borough have identified a strong need for improving year-round overland access between Iliamna/Newhalen and Nondalton. Concurrent with this general need, as explained in Section I of the EA, are specific needs to improve public safety, improve health care/services, expand and diversify community economies, improve the supply of government services, enhance the delivery of educational services, and correct or alleviate some existing environmental drainage and erosion problems.

Improving overland access between Iliamna/Newhalen and Nondalton is the highest priority transportation improvement project of the Lake and Peninsula Borough, as well as the communities of Iliamna/Newhalen and Nondalton. A well traveled, unfinished gravel road suitable for cars, trucks, and heavy equipment exists from Iliamna/Newhalen to the proposed bridge-crossing site at the Newhalen River. A less traveled road/trail exists from the crossing site to Nondalton. Some portions of that road/trail cross Alaskan Native Corporation property because the road right-of-way clearing has overgrown and users utilize the areas where the vegetation is shortest.

The long history of study and number of endorsements for improving the overland access between Iliamna/Newhalen and Nondalton demonstrates the need for this project.

Proposed Action:

The Preferred Alternative would 1) resurface, restore, and rehabilitate the existing approximately 23.17 kilometers (km) (14.4 mile) of roadway from Iliamna to the Newhalen River, 2) construct an approximately 199.1 meter (m) (653.2') long, 5.69 m (18.67') wide, one-lane, six span steel girder bridge over the Newhalen River, 3) improve approximately 2.74 km (1.7 miles) of roadway/trail from the Newhalen River to the Nondalton material site to meet current roadway standards, and 4) rehabilitate the existing approximately 1.0 km (0.6 mile) roadway from the Nondalton material site to Nondalton.

History of Project:

The original road, constructed by the military, began at the Iliamna airfield and continued on to a boat launch site on the east bank of the Newhalen River approximately 183 meters (600 feet) downstream from the mouth of Alexcy Creek. The "landing site" and old road are still used today to access the river and Nondalton. The need for the Iliamna-Nondalton Road as a state project was first formally identified in 1972. Project development was initiated from 1972 through 1975, however, in 1975, Nondalton residents expressed concern that their lifestyle would be affected and preferred that the

road connection to Nondalton be eliminated. As a result, in 1976 only the roads in the Iliamna and Newhalen area were upgraded.

A few years later the communities of Nondalton and Newhalen reinitiated action to construct a road between Nondalton and the Iliamna Airport. The legislature appropriated funding which was transferred to the City of Nondalton through a Transfer of Responsibility Agreement. The original intent of the project was to construct a full two lane community road and bridge between Iliamna/Newhalen and Nondalton. During Phase I, a pioneer road was stripped and constructed 11.43 km (7.1 miles) from the Newhalen River east towards Iliamna. An access trail was stripped and built on the Nondalton side, west of the Newhalen River. Resource agency permits were received for the road and bridge in 1984, however only a portion of the project was completed before funds were exhausted.

An economic feasibility study was done in 1986 to assess socioeconomic elements in a time of declining state revenue. After the initial funding, no further state assistance was granted for over a decade.

Alternatives Rejected:

The Alaska Department of Transportation and Public Facilities (ADOT&PF) has looked at numerous alternatives and bridge types to provide year-round overland access between Iliamna/Newhalen and Nondalton. These alternatives are discussed in Section III of the EA. Build Alternative No. 1, the preferred alternative, is a six span steel girder bridge over the Newhalen River and road improvements. The preferred alternative is the alternative with the least amount of environmental impact that satisfies the purpose and need of this project. Build Alternative No. 2 is a two span bridge and road improvements while Build Alternative No. 3 is a clear span bridge and road improvements. Build Alternatives No. 4, 5 and 6 include all of the road improvements described in Build Alternatives No. 1, 2 and 3, but involve different means to cross the Newhalen River.

Build Alternatives Nos. 2 - 8 were evaluated and eliminated during the preliminary design for this project because they would have presented serious problems with one or more of the following: reliability, convenience, safety, constructability, or cost. Consequently, only Build Alternative No. 1 and the No-Build Alternative impacts are fully evaluated in the EA.

Build Alternative No. 1 is preferred over the No-Build Alternative. The Federal-aid highway program mandate to provide safe and efficient transportation and the beneficial impacts of the proposed transportation improvement far outweigh the minimal negative impacts that may occur as a result of this project. Strong local support for improving the overland access between Iliamna/Newhalen and Nondalton also demonstrates the need for this project.

Environmental Consequences:

The proposed action will involve temporary impacts to wetlands and anadromous fish streams during construction. However, the overall impact of the project will be beneficial to wetlands and anadromous fish streams in terms of alleviating many existing erosion and sedimentation problems that affect these resources along the Iliamna-Nondalton Road.

The Secondary and Cumulative Impacts Study (SCIS) appended to the EA (Appendix B) identifies and describes potential and cumulative secondary impacts, and determines their magnitude. The report concludes that the project is likely to result in an overall improvement in the general environmental quality of the study area and to lessen several current risks to valuable environmental resources in the study area. Improved overland access would enhance the opportunity for joint regional development of public safety and government facilities, health care facilities, utilities, and the delivery of educational services to all three communities. The SCIS also concludes that an overall improvement is anticipated in the economic structure and the surface transportation in the study area. The report indicates that road reconstruction would provide increased access to private lands on the west side of the Newhalen River. The project may have a minor negative effect on the existing high-end tourist industry in the study area. This effect, however, would be offset by gains in the broader tourism market, resulting in a net positive impact on tourism in the study area. Reconstruction of the road is anticipated to contribute to the existing pattern of increasing recreational use of the area, but would not result in a significant impact on those resources. Minor cumulative benefits to residents of the state are expected through a reduction in the cost of services, less duplication of facilities and the furtherance of independence for the study area. Road reconstruction is likely to have a minor effect in reinforcing, but not changing, the existing social trends in the study area. The proposed road reconstruction would have no effect on the development of the Pebble Copper Mine or other proposed or existing resource extraction developments. Existing use patterns at Lake Clark National Park and Preserve will not be affected by the proposed road reconstruction. No other significant secondary or cumulative impacts were identified by the study.

Measures to Minimize Harm:

The permits include the following stipulations and will be incorporated into final design:

For the culverted stream crossings at stations 55+700, 56+100, 56+560, 56+700, 57+358, and 57+517, and Lovers Creek (39+765):

1. Prior to installation of the culverts, culvert baffles, and inlet/outlet aprons, site dewatering and sediment control plans and baffle designs shall be forwarded to the ADF&G/H&R for review and approval.
2. Water shall bypass the work area and be supplied to the stream reach immediately downstream of the work area in a constant flow and in sufficient quantity to support the fish living in the stream.

3. Immediately upon dewatering the work area, any fish that are stranded shall be collected and returned unharmed to the stream reach containing a continuous supply of water.
4. The culvert shall be designed, installed, and maintained so that water velocity, flow, and any resulting drops in the water surface profile at any point within the culvert influence shall not impede the efficient passage of the slowest swimming fish group that occurs at the location of the proposed culvert installation.
5. The culvert shall be installed on a firm substrate. If necessary to obtain a solid foundation, peat or other unsuitable material shall be excavated to a solid substrate and the area backfilled with clean gravel prior to placement of the culverts.
6. Riprap placed in and along the banks of the stream channel must conform to the channel shape and be inset to the design thickness so it will not constrict the channel. Alluvial gravel shall be layered on the inundated portions of the inlet and outlet aprons. The intent of the gravel is to accelerate deposition of finer grained material into the riprap voids, forcing the water to flow on top of the riprap instead of through it. The alluvial gravel should come from channel excavation activities or another source with similar gradation.
7. Each bank cut, slope, fill, and exposed earth work attributable to culvert installation and road building activities must be stabilized to prevent erosion both during and after project construction.

For the South Fork Alexcy Creek rock weirs:

8. Prior to installation of the culvert baffles and the rock weirs, site dewatering and sediment control plans and baffle designs shall be forwarded to the ADF&G/H&R for review and approval.
9. The section of stream where rock weirs are installed shall be dewatered during excavation and rock installation operations. Water shall bypass the work area and be supplied to the stream reach immediately downstream of the work area in a constant flow and in sufficient quantity to support the fish living in the stream.
10. Immediately upon dewatering the work area, any fish that are stranded shall be collected and returned unharmed to the stream reach containing a continuous supply of water.
11. The rock weirs shall be constructed of stones large enough to withstand a 50-year flood event and not be washed away. They shall also be sealed to ensure that pools are created and that water flows over and not through the weir. Each weir shall be equipped with a notch in which is installed a training wall designed to

create a jet of water that attracts fish to the notch and enhances their ability to pass upstream.

For the Bear Creek culvert baffles and outlet apron:

12. All inwater work shall occur only during the period May 15 through July 15.
13. Prior to installation of the culvert baffles and the outlet apron, site dewatering and sediment control plans and baffle designs shall be forwarded to the ADF&G/H&R for review and approval.
14. Water shall bypass the work area and be supplied to the stream reach immediately downstream of the work area in a constant flow and in sufficient quantity to support the fish living in the stream.
15. Immediately upon dewatering the work area, any fish that are stranded shall be collected and returned unharmed to the stream reach containing a continuous supply of water.
16. Riprap placed in and along the banks of the stream channel must conform to the channel shape and be inset to the design thickness so it will not constrict the channel. Alluvial gravel shall be layered on the inundated portions of the inlet and outlet aprons. The intent of the gravel is to accelerate deposition of finer grained material into the riprap voids, forcing the water to flow on top of the riprap instead of through it. The alluvial gravel should come from channel excavation activities or another source with similar gradation.

For the Newhalen River bridge:

17. All inwater work shall occur only during the period May 15 through July 15.
18. Equipment servicing and refueling shall not be conducted below the ordinary high water level of the Newhalen River. Equipment leaking fuel, oil, hydraulic fluid or other pollutants shall not be operated below the ordinary high water level or moved on the shoreline or bed of the Newhalen River. Petroleum product spills shall be cleaned up immediately and contaminated earth, debris, or other materials shall be disposed of as required by Alaska Department of Environmental Conservation regulations.
19. Installation of the riprap on the east bank must be completed either when the site is naturally dewatered or when measures must be taken to isolate and dewater the site from the flowing water of the river. Prior to manually dewatering the site, a set of riprap blanket site dewatering and sediment control plans shall be forwarded to AFDF&G/H&R Division for review and approval.

20. The slurry and sediment laden water removed from each pile prior to filling with concrete must be collected and disposed in an approved area. Slurry and sediment laden water shall not be discharged into the Newhalen River.
21. The ADF&G, Habitat and Restoration Division shall be notified at 267-2333 at least 72 hours before commencement of pile driving and riprap installation operations.
22. Adequate sorbent materials (i.e., material that collects or absorbs petroleum products while at the same time repels water) must be kept on site to be used to contain and cleanup any spill of petroleum products.
23. Equipment servicing and fueling operations must not occur within the annual floodplain (vegetation to vegetation line) or within 30 meters (100 feet) from any river, stream, drainage channel or waterbody. Petroleum products and hazardous materials must not be stored within 30 meters (100 feet) of water bodies. Stored petroleum products and hazardous materials must be placed within an impermeable diked area at 110 percent capacity of the largest independent fuel container. Manifolded tanks or bladders must be considered as a container.
24. Each bank cut, slope, fill, bottoms of road side ditches, and exposed earth work attributable to the project, especially during culvert installation and road building activities and at the east approach of the Newhalen River bridge, must be stabilized to prevent erosion both during and after project construction.
25. ADOT&PF shall install silt fences or implement other methods as necessary to filter or settle suspended sediment from drainage wastewater from the roadway construction prior to direct or indirect discharge into existing surface waters or wetlands. Any structure must be maintained until disturbed or deposited material has been stabilized against erosion. Special attention shall be given to collection and treatment of road embankment, road cut, and road surface runoff to the roadside ditches located at the bridge approach on the east side of the Newhalen River.
26. The ability of all persons to use or access state land or public water shall not be restricted in any way.

The Federal Highway Administration (FHWA) has conducted an independent review of the revised Environmental Assessment (EA) and ADOT&PF responses to comments received on the EA and has determined that the Preferred Alternative will not have a significant impact on the human environment. FHWA finds that the revised EA adequately and accurately discusses the need, environmental issues, and impacts of the proposed project, as well as the comments provided by the public and agencies during the EA review period. It complies with Executive Order 11990, Protection of Wetlands, Executive Order 11988, Floodplain Management and Executive Order 12898, Environmental Justice.

FHWA has determined that the revised EA provides sufficient evidence and analysis for determining that an Environmental Impact Statement will not be required. FHWA takes full responsibility for the accuracy, scope and content of the attached revised EA.

12/31/01
Date

Tim Ayle ENV/Right of Way Program Manager
For FHWA (Name & Title)

REVISED ENVIRONMENTAL ASSESSMENT
ILIAMNA-NONDALTON ROAD IMPROVEMENTS
Project No. STP-0214(3)/51951

Submitted Pursuant to 42 U.S.C. 4332(2)(c)
 by the
 U.S. Department of Transportation
 Federal Highway Administration
 and the
 State of Alaska
 Department of Transportation and Public Facilities

This action complies with Executive Order 12898, Environmental Justice; Executive Order 11988, Floodplain Management; and Executive Order 11990, Protection of Wetlands.

12/24/01
 Date of Recommendation

[Signature]
 For ADOT&PF

CHIEF PDI
 Title

12/24/01
 Date of Concurrence

[Signature]
 For ADOT&PF

REGIONAL DIRECTOR
 Title

12/24/01
 Date of Approval

[Signature]
 For ADOT&PF

Preconstruction Engineer
 Title

12/31/01
 Date of Approval

[Signature]
 For FHWA

ENV/Right of Way Program Manager
 Title

The following persons may be contacted for additional information concerning this document:

David C. Miller
 Division Administrator
 Federal Highway Administration
 P.O. Box 21648
 Juneau, AK 99802-1648
 Telephone (907) 586-7180

Jerry O. Ruehle
 Environmental Coordinator
 ADOT&PF
 P.O. Box 196900
 Anchorage, AK 99519
 Telephone (907) 269-0534

The Alaska Department of Transportation and Public Facilities (ADOT&PF), in cooperation with the Federal Highway Administration (FHWA), proposes to improve overland access between the communities of Iliamna/Newhalen, and Nondalton. The proposed project would 1) resurface, restore, and rehabilitate the existing approximately 23.17 kilometers (km) (14.4 mile) of roadway from Iliamna to the Newhalen River, 2) construct an approximately 199.1 meter (m) (653.2') long, 5.69 m (18.67') wide, one-lane, six span steel girder bridge over the Newhalen River, 3) improve approximately 2.74 km (1.7 miles) of roadway/trail from the Newhalen River to the Nondalton material site to meet current roadway standards, and 4) rehabilitate the existing approximately 1.0 km (0.6 mile) roadway from the Nondalton material site to Nondalton.

SUMMARY

The Alaska Department of Transportation and Public Facilities (ADOT&PF), in cooperation with the Federal Highway Administration (FHWA), proposes to improve overland access between the communities of Iliamna/Newhalen, and Nondalton. The proposed project would 1) resurface, restore, and rehabilitate the existing approximately 23.17 kilometers (km) (14.4 mile) of roadway from Iliamna to the Newhalen River, 2) construct an approximately 199.1 meter (m) (653.2') long, 5.69 m (18.67') wide, one-lane, six span steel girder bridge over the Newhalen River, 3) improve approximately 2.74 km (1.7 miles) of roadway/trail from the Newhalen River to the Nondalton material site to meet current roadway standards, and 4) rehabilitate the existing approximately 1.0 km (0.6 mile) roadway from the Nondalton material site to Nondalton.

The proposed bridge site would be located between Sixmile Lake and Iliamna Lake approximately 3.54 km (2.2 miles) downstream of Nondalton near the outlet of Sixmile Lake and 22.53 km (14 miles) north of Iliamna. The purpose of the project is to provide safe, reliable, year-round, all-weather overland access for people and cargo between Iliamna/Newhalen and Nondalton.

The road improvements would include reconstruction of the roadway base, resurfacing, installation, extension or replacement of culverts where necessary, and embankment stabilization to prevent and arrest erosion. Material required for construction would likely be obtained from excavation for the bridge approach on the Iliamna/Newhalen side, an existing upland material site located near Nondalton, and uplands along the roadway/trail corridor.

The purpose of this National Environmental Policy Act (NEPA) Environmental Assessment (EA) is to document the project elements and assess the environmental impacts to determine whether or not project impacts are significant pursuant to Council on Environmental Quality (CEQ) Part 1508.27. If the impacts are found not to be significant, the FHWA will issue a finding of no significant impact (FONSI). If there are significant impacts an environmental impact statement (EIS) will be prepared. Significant environmental impacts are identified with the assistance of public and resource agencies that have subject matter expertise or jurisdiction by law.

Since this project will impact approximately 1.74 hectares (4.3 acres) of wetlands, the project was scoped pursuant to the "Interagency Working Agreement to Integrate Section 404 and Related Permit Requirements into the National Environmental Policy Act" (finalized June 11, 1997). The intent of the COE 404 / NEPA Merger Agreement (attached in Appendix E) is to merge the permitting and environmental document procedures, running them concurrently instead of serially as has been done in the past. The goal is to receive the COE permit at the same time ADOT&PF receives environmental document approval. ADOT&PF works with resource protection agencies during preparation of the environmental document to ensure that it addresses all impacts that must be addressed by the COE. That way, ADOT&PF's environmental document can be adopted by the COE for the issuance of the COE permit, thus saving time and money.

The merger agencies for this project included the Alaska Department of Environmental Conservation, Alaska Department of Fish and Game, Alaska Department of Natural Resources, National Marine Fisheries Service, United States Corps of Engineers, United States Fish and Wildlife Service, United States Environmental Protection Agency, and the Lake and Peninsula Borough. (The USFWS has not signed the NEPA/404 Merger Agreement, however, they did participate in the process and provide concurrence forms at the appropriate concurrence points.) The eight merger agencies were contacted at three concurrence points: purpose and need, range of alternatives, and the preferred alternative. At all three stages, the merger agencies either concurred or elected not to participate in that stage for one of two reasons; they felt that based on the information presented that any regulatory or resource issue would be resolved at the next stage of project development or the agency did not have the ability to participate due to resource constraints. The table below shows how the merger agencies elected to participate.

Merger Agency Responses

Agency	Scoping Response	Significant Comments	Purpose & Need Concurrence Response	Alternatives to be Analyzed Concurrence Response	Preferred Alternative Concurrence Response
U.S. Army Corps of Engineers (COE)	Yes	No	Concurrence	Concurrence	Concurrence
National Marine Fisheries Service (NMFS)	Yes	No	Concurrence	Concurrence	Nonparticipation by choice
U.S. Environmental Protection Agency (EPA)	Yes	No	Nonparticipation by constraint	Nonparticipation by constraint	Nonparticipation by constraint
U.S. Fish & Wildlife Service (FWS)	Yes	No	Did not sign form	Did not sign form	Nonparticipation by choice
Alaska Department of Environmental Conservation (DEC)	Yes	No	Concurrence	Concurrence	Nonparticipation by constraint
Alaska Department of Fish & Game (F&G)	Yes	No	Nonparticipation by choice	Concurrence	Nonparticipation by choice
Alaska Department of Natural Resources (DNR)	Yes	No	Concurrence	Nonparticipation by choice	Concurrence
Lake & Peninsula Borough (L&PB) Coastal Resource Service Area (CRSA)	Yes	No	Concurrence	Concurrence	Concurrence

Some positive project effects identified during the scoping process were: better interaction between the communities, increased sharing of resources and services, greater employment opportunities, and the ability to safely cross the Newhalen River. Some of the concerns raised were: potential increased trespass on land outside the state right-of-way, potential increased usage of surrounding lands, and potential impacts to the Newhalen River's water quality and fisheries.

The following Federal, State and local permits, approvals or clearances will be required for this project: 1) U.S. Corps of Engineers (COE) Section 404/10 Permit for work in waters of the US, including wetlands, 2) U.S. Coast Guard (USCG) Section 9 for work over navigable waters, 3) Alaska Department of Fish and Game (ADF&G) Title 16 for work in anadromous or resident waters, 4) Alaska Department of Environmental Conservation (ADEC) Section 401 Water Quality Certification, 5) Alaska Division of Governmental Coordination (ADGC) Coastal

Consistency Determination, 6) Lake and Peninsula Borough (L&PB) Development Permit, and 7) Alaska Department of Natural Resources (ADNR) Early Entry Authorization.

Project Permitting Status

Agency	Type of Authorization	Permit or File #	Issue Date	Exp. Date
COE	Section 10/404 Permit	2-830477	3-16-01	9-30-03
ADEC	Section 401 Certificate of Reasonable Assurance	Newhalen River 4, NPACO No. 2-830477	2-27-01	N/A
USCG	Section 9 Permit	Pending	Pending	Pending
ADGC	Final Consistency Determination	AK 0002-12AA	2-23-01	N/A
ADFG	Fish Habitat Permit	FG 01-II-0074	3-2-01	12-31-03
L&PB	Development Permit	N/A	2-14-00	N/A
ADNR	Early Entry Authorization	ADL 227751	4-5-01	3-31-03

The project would be funded by the FHWA (approximately 91 percent) with the remaining nine percent coming from the State of Alaska. There is currently \$5.0 million dollars identified in the 2001-2003 State Transportation Improvement Program (STIP) draft Amendment #1 for construction beginning in the year 2003.

Public testimony and comments received on the Environmental Assessment have been addressed in this revised Environmental Assessment. ADOT&PF held public meetings in October 1997 in the communities of Nondalton, Iliamna, and Anchorage. The majority of written comments received were in strong support of the project. Written comments are provided in Appendix A. ADOT&PF also held three public hearings in February and March 2000 to allow public input on the Environmental Assessment. A summary of the comments is presented beginning on page 52, and a copy of the hearing transcript and actual written comments are provided in Appendix D. There was unanimous support for the project by community residents during these hearings, and most would like to see the project constructed as soon as possible.

Because much of the work in this document is over 5 years old, ADOT&PF reviewed project area data and consulted with the Lake and Peninsula Borough manager to determine whether the information in this document is still valid, as of December 2001. After reviewing the studies, conclusions, and data used in the document, ADOT&PF has determined that this Environmental Assessment is still valid. There have been no significant changes in the area's demographics, land ownership / land use, government services, education services, public health and safety, transportation facilities, utilities, tourism, fish and wildlife resources, or subsistence use. The following facts are intended to provide updated information relevant to the project area.

Demographics:

Data from the 2000 U.S. Census indicate that the demographics have essentially remained the same since this document and the Secondary and Cumulative Impacts Study (SCIS) were written. The SCIS refers to the 1995 U.S. Census population of 99 for Iliamna, with 66% native and the population split almost evenly for males and females. The 2000 U.S. Census reported the population of Iliamna at 102, with 57.8% native, 54 males, and 48 females. The SCIS refers to the 1995 U.S. Census population of 227 in Nondalton, with 89.3% native, 120 males and 107

females. The 2000 U.S. Census reported the population of Nondalton at 221, with 90% native, 121 males, and 100 females.

Public Health and Safety:

The Nilavena Tribal Consortium has received grants from the Denali Commission and the Lake and Peninsula Borough to construct a regional health facility near the Iliamna Airport in 2002. Improved overland access between Iliamna and Nondalton would allow easier access to this facility by Nondalton residents.

Economic:

According to the Lake and Peninsula Borough manager (Walt Wrede), the economy of the project area has become seriously depressed in the last 5 years due to the commercial fishing crisis in the Bristol Bay Area. Current Alaska Department of Community and Economic Development (ADCED) data indicates that fishing in Bristol Bay is an important source of income for Iliamna, Newhalen, and Nondalton residents. Over the past several years, fish returns have decreased significantly, and the price of fish has also dropped dramatically. Economic disasters were declared by the Governor of Alaska in 1997, 1998, and 2001 for the project area. The Department of Commerce also issued Magnuson-Stevens Act Fish Disaster Grants to the three communities in 1997 and 1998.

Tourism:

The Nilavena Tribal Consortium has received a grant from the Economic Development Administration to construct a visitor and cultural center at the Iliamna Airport. This facility is scheduled for construction in 2002.

Fish and Wildlife / Subsistence Use:

ADF&G was contacted to ensure that no new issues regarding fish and wildlife or subsistence use needed to be addressed in the revised EA. They stated that the issues have been adequately addressed in the EA and the SCIS, and that ADF&G does not have any concerns with the project, as long as the stipulations in the Title 16 permit are adhered to (personal communication, ADF&G, Wayne Dolezal, October 1, 2001).

ADOT&PF does not believe that the changes described above affect the conclusions of the document. Because the demographics have remained essentially the same since the EA and the SCIS were written, and no new major operations or projects have begun in the region according to the Lake and Peninsula Borough, ADOT&PF considers this Environmental Assessment still valid.

TABLE OF CONTENTS

	<u>Page</u>
Summary	i
Table of Contents	v
List of Tables and Figures	vii
List of Acronyms and Abbreviations	viii
I. Purpose and Need Statement	1
II. Background	
A. Road History.....	5
B. Road Condition.....	6
C. Road Classification.....	6
D. Maintenance of Road	7
E. History of Community Support for Project.....	7
F. Other ADOT&PF Projects Planned for the Iliamna-Nondalton Area.....	8
III. Alternatives	
A. Alternatives Meriting Further Consideration	9
1. No-Build Alternative	9
2. Preferred Alternative: Build Alternative No. 1.....	9
B. Alternatives Considered but Eliminated.....	11
1. Two Span Bridge Alternatives: Build Alternative No. 2.....	11
2. Clear Span Bridge Alternatives: Build Alternative No. 3.....	12
3. Ferry Alternative: Build Alternative No. 4.....	12
4. Tram Alternative: Build Alternative No. 5.....	13
5. Floating Bridge Alternative: Build Alternative No. 6.....	13
6. Improve Road, No Bridge Alternative: Build Alternative No. 7.....	13
7. Build Bridge, No Road Improvements Alternative: Build Alternative No. 8.....	14
IV. Environmental Consequences	
A. Land Use	15
B. Farmland.....	16
C. Social.....	16
D. Relocation.....	18
E. Economic.....	18
F. Considerations Relating to Pedestrians and Bicyclists.....	19
G. Air Quality.....	19
H. Noise.....	19
I. Water Quality	20
J. Permits and Clearances Required.....	23
K. Wetlands.....	23
L. Water Body Modifications.....	26
M. Floodplain.....	26
N. Wild and Scenic Rivers.....	28
O. Coastal Barriers/Coastal Zone.....	28
P. Threatened and Endangered Species.....	28
Q. Fish and Wildlife (including EFH).....	28

R. Historic, Archeological and Cultural Resources.....	31
S. Hazardous Waste.....	31
T. Visual.....	32
U. Energy.....	32
V. Construction.....	33
W. Material and Disposal Site(s).....	34
X. The Relationship between Local Short-term Uses of Man’s Environment and the Maintenance and Enhancement of Long-Term Productivity.....	34
Y. Irreversible and Irretrievable Commitments of Resources.....	35
Z. Secondary and Cumulative Impacts.....	35
V. Comments and Coordination	
A. Agency Scoping.....	43
B. Public Scoping.....	45
1. Iliamna Meeting.....	45
2. Nondalton Meeting.....	45
3. Anchorage Meeting.....	45
C. Additional Scoping Activities.....	45
D. Summary of Comments.....	46
1. Merger Agencies.....	46
a. Purpose and Need Concurrence.....	46
b. Summary of Issues Raised.....	46
c. Alternatives to be Analyzed Concurrence.....	47
d. Preferred Alternative Concurrence.....	48
2. Other Agencies and the Public.....	49
a. Summary of Issues Raised.....	49
b. New Alternatives Suggested.....	52
c. Special Studies Suggested.....	52
E. Environmental Assessment Comments.....	52
1. Summary of Agency Comments.....	52
2. Summary of Public Comments.....	53
VI. List of Preparers.....	55
VII. Bibliography.....	57

Figures

Appendices

- A. Correspondence
- B. Secondary & Cumulative Impact Study
- C. Permit Application or Permit
 - COE Section 404/10 Permit
 - U.S. Coast Guard Section 9 Application
 - ADGC Final Coastal Consistency Determination
 - ADF&G Title 16 Permit
 - L&PB Development Permit
 - ADNR Early Entry Authorization

- D. Environmental Assessment Review Comments and Responses
- E. Interagency Working Agreement To Integrate Section 404 Into The National Environmental Policy Act (June 11, 1997)

LIST OF TABLES

	<u>Page</u>
Table 1 - Merger Agency Responses	44
Table 2 - Other Agency/Organization Responses.....	44

LIST OF FIGURES

- Figure 1 - Location and Vicinity Maps
- Figure 2 - Proposed Bridge Site – Aerial Photo
- Figure 3 - Proposed Newhalen River Bridge General Layout
- Figure 4 - Proposed Newhalen River Bridge Site Plan
- Figure 5 - Proposed Bridge Access Design Options
- Figure 6 - General Area - Land Status Map
- Figure 7 - Photo 1. Typical view of Iliamna-Nondalton Road.
Photo 2. Aerial view of Alexcy Creek Bridge.
- Figure 8 - Photo 3. Alexcy Creek Bridge.
Photo 4. ATV trail on Nondalton side of the Newhalen River.
- Figure 9 - Photo 5. Steep Iliamna bank of the Newhalen River.
Photo 6. Nondalton, as seen from the Iliamna bank of the Newhalen River.
- Figure 10 - Photo 7. ATV trail between the Newhalen River and the Nondalton material site.
Photo 8. Fish Village on the Iliamna side of the Newhalen River.
- Figure 11 - Photo 9. Culvert on eroded bank along the Iliamna-Nondalton Road.
Photo 10. Typical view of erosion along the Iliamna-Nondalton Road.
- Figure 12 - Photo 11. Aerial view of wide footprint.
Photo 12. Aerial view of wide footprint.
- Figure 13 - Photo 13. Eroded road embankment at Lover's Creek.
Photo 14. Eroded road embankment at S. Fork Alexcy Creek.

LIST OF ACRONYMS AND ABBREVIATIONS

AAC	Alaska Administrative Code
ADCED	Alaska Department of Community and Economic Development
ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADGC	Alaska Division of Governmental Coordination
ADNR	Alaska Department of Natural Resources
ADOT&PF	Alaska Department of Transportation & Public Facilities
ADT	Average Daily Traffic
AS	Alaska Statute
ASA	Alaska Sportfishing Association
ATV	All-Terrain Vehicles
BBNC	Bristol Bay Native Corporation
BMPs	Best Management Practices
CE	Categorical Exclusion
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CRSA	Coastal Resources Service Area
EA	Environmental Assessment
EFH	Essential Fish Habitat
EIS	Environmental Impact Assessment
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
FY	Fiscal Year
INIT	Iliamna-Nondalton-Inter-Tie
INL	Iliamna Natives Limited
INNEC	Iliamna/Newhalen/Nondalton Electric Cooperative
ISTEA	Intermodal Surface Transportation Efficiency Act
L&PB	Lake and Peninsula Borough
MSL	Mean Sea Level
NCRS	Natural Resource Conservation Service
NMFS	National Marine Fisheries Service
NEPA	National Environmental Policy Act
NPDES	National Pollution Discharge Elimination System
OHA	Office of History and Archeology
OHW	Ordinary High Water
PEB	Project Evaluation Board
PL	Public Law
SCIS	Secondary and Cumulative Impacts Study
SHPO	State Historic Preservation Officer
STIP	Surface Transportation Improvement Program
STP	State Transportation Program
USC	United States Code
USCG	United States Coast Guard
USCOE or COE	United States Army Corps of Engineers
USFWS or FWS	Fish & Wildlife Service
VPSO	Village Public Safety Officer

I. PURPOSE AND NEED STATEMENT

The State of Alaska, the communities of Iliamna, Newhalen and Nondalton, and the Lake and Peninsula Borough have identified a strong need for improving year-round overland access between Iliamna/Newhalen and Nondalton. Concurrent with this general need are six other specific needs, including: 1) improve public safety, 2) improve health care/services, 3) expand and diversify community economies, 4) improve the supply of government services, 5) enhance the delivery of educational services, and 6) correct or alleviate some existing environmental drainage and erosion problems.

1. Improving overland access between Iliamna/Newhalen and Nondalton is the highest priority transportation improvement project of the Lake and Peninsula Borough, as well as the communities of Iliamna/Newhalen and Nondalton. A well traveled, unfinished gravel road suitable for cars, trucks, and heavy equipment exists from Iliamna/Newhalen to the proposed bridge-crossing site at the Newhalen River. A less traveled road/trail exists from the crossing site to Nondalton. Some portions of that road/trail cross Alaskan Native Corporation property because the road right-of-way clearing has overgrown and users utilize the areas where the vegetation is shortest.
2. There is a need to improve local public safety. A transportation system is needed that will provide less reliance on air transportation between Iliamna and Nondalton. Alaska occupational fatality rate for commercial pilots (271 per 100,000) is approximately twice as high as for professional motorized drivers (130 per 1000,000) with plane crashes being the leading cause of occupational fatalities in Alaska, according to the National Safety Council and the National Transportation Safety Board (Anchorage Daily News, 12/15/99). Therefore, the likelihood of potentially serious injuries and accidental deaths resulting from air travel between Iliamna and Nondalton needs to be reduced. Currently, overland winter travel between Iliamna and Nondalton is possible, but travelers have to cross the frozen Newhalen River and Sixmile Lake by snowmachine, vehicle or on foot. During the winter of 1988 two snowmachine riders drowned after falling through the ice near Nondalton. With reliable access across the Newhalen River, safer overland transportation, especially during periods of inclement weather, reduced visibility, and unstable river ice conditions, would become the preferred method of travel.
3. Improvements in health care/services are needed. The difficulty and expense of getting critically ill or injured people out of Nondalton in an emergency needs to be lessened. This need is most urgent in the event of a major disaster such as a fire. A transportation system is needed that would enable the sharing of facilities, expertise, and equipment. As an example, local residents have expressed a desire and have recently received funding to construct a regional health facility near Iliamna. Improved overland access would permit such facilities to provide services to all the residents of Iliamna/Newhalen and Nondalton.
4. The economies of Iliamna/Newhalen and Nondalton need to be expanded and diversified. The cost of goods in these communities needs to be lowered. Currently, Nondalton is the largest community in the Lake and Peninsula Borough, but it is relatively isolated and offers very few job opportunities. This economic problem has been exacerbated in recent years due

to the commercial fishing crisis in the Bristol Bay area. Currently, approximately 50 percent of the Nondalton potential workforce are unemployed. With an overland transportation link between Iliamna/Newhalen and Nondalton, the customer base for local businesses would increase. This would give Nondalton residents the ability to take advantage of a greatly expanded range of employment opportunities. Improved overland access would also permit reduction in costs to passengers and freight carriers between Iliamna/Newhalen and Nondalton. Currently, 25-33 percent of material costs in Nondalton is estimated to be directly attributable to flight costs (SCIS, page B-46 and personal communication, Nondalton Mayor Greene.)

5. Providing government services to the residents of these communities needs to become more efficient and convenient. Government facilities at all levels could be consolidated in one place on the transportation system, rather than being spread out among several communities. At present, the Tazimina Hydroelectric Project provides power for the villages of Iliamna, Newhalen, and Nondalton. From the power plant to Nondalton, a transmission line parallels a portion of the existing road to the Newhalen River, where it then crosses under the river, and continues on to Nondalton. There is a need for reduced transportation costs in order to maintain this portion of line. Further, the underwater portion of this utility connection is plagued by many power outages. A bridge across the river could benefit the power company by allowing the transmission line to be removed from the water and attached to the underside of the bridge. The Tazimina Cooperation would be responsible for permitting and paying for such action. Coordination with the appropriate utility companies would occur during the design and utility phases of this project.
6. There is a need to enhance the delivery of educational services to the communities of Iliamna/Newhalen and Nondalton. The school district would like to improve its ability to transport supplies, materials, students, and personnel between Iliamna/Newhalen and Nondalton. The overland access improvements would not only reduce costs, but also would increase the safety of students and staff who travel regularly between these communities. The school district needs options in providing enhanced secondary programs to students in Newhalen and Nondalton where student populations are not large enough to warrant the diversity of curriculum that could be made available if certain classes were consolidated. Improved transportation services are also needed to provide students from both schools with enhanced competition opportunities in sports activities.
7. There is a need to correct or alleviate some environmental problems, which presently exist. First, it is now necessary to drive vehicles and heavy equipment on or in the Newhalen River (a salmon and rainbow trout resource) to access the other side of the river. As an example, the Alaska Department of Fish & Game (ADF&G) has had to issue the City of Nondalton permits to drive its heavy equipment in the river so it can maintain the remainder of the road to Iliamna. Permits can restrict when and how often equipment can cross the stream thereby potentially restricting road repairs. A reliable transportation link across the river will also reduce tundra scarring along routes leading to and from currently used equipment crossing points. Vehicles that are driven across the riverbed disturb fish habitat and vehicles that disturb new tundra are potentially creating an erosion problem. Second, the existing road has some erosion and drainage problems. This situation results in unnecessary environmental

damage along the road corridor. For example, ADF&G has reported that there is erosion taking place at various points adjacent to the road (see Figure 13) and at the steep bank to the Newhalen River at the terminus of the road from Iliamna. The base of the steep bank is a primary site used by local residents to beach their skiffs for transporting people and goods across the Newhalen River. The erosion problem at the steep bank is aggravated by people climbing up and down the bank and by wave action from the numerous skiffs which cross the river at this point. The road also has drainage problems in certain areas. This frequently results in large sections of the road becoming impassable due to mud. During these periods, vehicles drive around the poorly drained areas which causes the footprint of the road to become wider and wider, and results in unnecessary damage to the adjacent tundra and stream crossings (see Figure 12). There is a need to alleviate these problems.

In addition to the above mentioned needs, a small secondary benefit of this project would be more infrastructure to accommodate the growth of mid-market tourism in Iliamna/Newhalen and Nondalton. The ADF&G reports the current growth in angler days at between seven and 11 percent per year in this general area. Air taxi operators report similar growth rates for their operations during the summer and fall. Many other signs and statistics point to an increase in the utilization of the area including the increase in flights in to Iliamna and the vacancy bed rate. In addition, the Nilavena Tribal Consortium has received a grant from the Economic Development Administration to construct a visitor and cultural center at the Iliamna Airport. This facility is scheduled for construction in 2002. This project could enhance cultural and non-consumptive tourism in the area.

In conclusion, the long history of study and number of endorsements for improving the overland access between Iliamna/Newhalen and Nondalton demonstrates the need for this project. The purpose of this project is to meet those needs to the greatest extent practical.

II. BACKGROUND

A. Road History

During construction of the Iliamna airfield in 1942, the military began constructing the road north from Iliamna. The original road began at the airfield and continued on to a boat launch site on the east bank of the Newhalen River approximately 600 feet downstream from the mouth of Alexcy Creek. The "landing site" and old road are still used today to access the river and Nondalton. The need for the Iliamna-Nondalton Road as a state project was first formally identified in 1972. Project development was initiated from 1972 through 1975, with public involvement and coordination with other agencies. In 1975, Nondalton residents expressed concern that their lifestyle would be affected and preferred that the road connection to Nondalton be eliminated. As a result, in 1976 only the roads in the Iliamna and Newhalen area were upgraded.

A few years later the communities of Nondalton and Newhalen reinitiated action to construct a road between Nondalton and the Iliamna Airport. The legislature appropriated approximately \$1.45 million in 1983 and \$3 million in 1984 for the project called the Iliamna-Nondalton-Intertie project or I-N-I-T road. This money was transferred to the City of Nondalton through a Transfer of Responsibility Agreement. Upon project completion, the City of Nondalton had agreed to provide routine maintenance of the road (beyond the State's cutoff at MP 2.9) with possible assistance from the City of Newhalen, the Village of Iliamna, and the Iliamna/Newhalen/Nondalton Electric Cooperative (INNEC).

The original intent of the I-N-I-T project was to construct a full two-lane community road and bridge between Iliamna/Newhalen and Nondalton. During I-N-I-T Phase I, a pioneer road was stripped and constructed 11.43 km (7.1 miles) from the Newhalen River east towards Iliamna. An access trail was stripped and built on the Nondalton side, west of the Newhalen River. Resource agency permits were received for the road and bridge in 1984, however only a portion of the project was completed before funds were exhausted.

The key stumbling block to successful completion of the road was the bridge over the Newhalen River. A used bridge, consisting of parts from the former Gulkana River Bridge and the Lowe River Bridge, was partially transported to Iliamna. By March 1986 the road had been partially constructed from Iliamna to a point just north of Alexcy Creek. From there, clearing and grubbing was done for another 9.66 km (6.0 miles) north to the Fish Village on the Newhalen River. Overburden had been partially removed between the 5.15 km (3.2 miles) from the Newhalen River to Nondalton.

An economic feasibility study was done in 1986, to assess socioeconomic elements in a time of declining state revenue. After the initial funding, no further state assistance was granted for over a decade.

Since construction of the I-N-I-T road, both Nondalton and Iliamna have received funds from the State Revenue Sharing Program and revenues from the Lake and Peninsula Borough that provide

for road maintenance of the existing road, beyond MP 2.9. Some maintenance activities have also been performed by INNEC.

B. Road Condition

An agency field trip was conducted on July 14, 1995. Those present noted that the road was still in good condition from the airport north to the Alexcy Creek Bridge, at approximately Mile 8.5. The Alexcy Creek Bridge was in excellent condition since earlier in 1995 ADOT&PF Maintenance Section had done a good job rehabilitating the bridge. North of the bridge there was no gravel surfacing or roadway base. The cleared road right-of-way, however, remained very passable for vehicles. The existing natural substrate, silty glacial till, served as a road surface along most of the roadway. The inspection team drove to the proposed bridge site on the east side of the Newhalen River. The trail on the north side of the river to Nondalton was accessed from the river and inspected. From an aerial view, the group noted the roadway from Nondalton to the material site was in very good condition with only a limited number of drainage gullies that would require culvert structures.

Subsequent field trips during the summer of 1996 and 1997, and again in 1999, revealed the section of the Iliamna-Nondalton Road from Iliamna to the Alexcy Creek Bridge was still in good condition. Access from the Iliamna Airport to the proposed bridge site using two-wheeled drive vehicles was possible during much of the year except when blocked by snow or during very wet conditions. ADF&G has stated a major environmental concern they have with the existing roadway is the eroding road embankment at Lover's and S. Fork Alexcy Creeks (see Figure 13). The embankments are badly eroded and are depositing sediment into both streams. In addition staff observed the culvert outlet at the S. Fork Alexcy Creek being perched and undercut, thereby creating a possible fish barrier. They have requested all these problems be fixed.

C. Road Classification

An issue was brought up during scoping regarding the road classification of the existing road / trail that is being used by residents of Nondalton, Iliamna, and Newhalen to travel between the communities. The existing roadway qualifies under 17 AAC 05.030 as different types of "Off-System Roads". The roadway section from the Iliamna Airport to the Alexcy Creek Bridge meets the criteria under 17 AAC 05.030 for a "community road". This section has received regular maintenance and a new bridge deck over Alexcy Creek. The roadway is used to access the boat "landing site" on the Newhalen River approximately 8.5 miles from the Iliamna Airport.

The road from the Alexcy Creek Bridge to the Newhalen River meets the requirements of 17 AAC 05.030(c) for a "basic access road" and has received only occasional maintenance. A basic access road may be any public road that 1) is at least eight feet wide, 2) has portions of its route graded and surfaced, 3) has drainage improvements that do not meet ADOT&PF standards for secondary roads, 4) has structural improvements that permit the fording of streams, 5) has no signage, and 6) provides access to a cabin, homestead, lodge, or mineral extraction site. This roadway section has never received a proper surface and the road profile has deteriorated. The culverts installed in this reach approximately fifteen years ago allow proper drainage for surface runoff and are still functioning and in good condition. Several areas of this section of the roadway consist of soft materials, such as silty volcanic ash, and are difficult to traverse in wet weather or during spring breakup. Vehicles commonly leave the existing road right-of-way in

these areas to go around the soft spots. This off-road activity has significantly widened the area impacted by erosion (see Figures 7 and 12). In some areas the out-of-bounds traffic has endangered the Iliamna-Newhalen-Nondalton Electric Cooperative (INNEC) buried cable which runs parallel to the existing road right-of-way.

The roadway on the west side of the Newhalen River proceeds for 2.74 km (1.7 miles) to the material site outside the city of Nondalton. Residents use various modes of transportation along this roadway/trail including ATVs, snowmachines, and four wheel drive vehicles. This roadway section meets criteria under 17 AAC 05.030(b) as a "trail". The statute defines a trail as a foot path or way open to public use as a matter of right that 1) is not more than eight feet wide, 2) is not graded or surfaced and 3) has drainage improvements, if any, which do not meet minimum ADOT&PF standards for secondary roads.

Under 17 AAC 05.030(c), the remaining 2.25 km (1.4 miles) from the material site to the Nondalton Airport qualifies as a "community road". This roadway section was reconstructed and improved in 1994 as part of the Nondalton Airport Improvement Project No. 58617. A community road meets minimum ADOT&PF standards for secondary roads, and provides access from a community to a local site used by residents or from a mineral extraction site to a mineral resource transportation facility.

D. Maintenance of the Road

The Lake and Peninsula Borough (L&PB) Assembly passed a resolution on October 16, 2001 affirming its commitment to provide for basic and routine maintenance on the road after construction is complete in partnership with the communities of Iliamna, Nondalton, and Newhalen and in accordance with a Maintenance Agreement approved by ADOT&PF and the Borough (see page A-252 in Appendix A). ADOT&PF and L&PB will finalize a formal Maintenance Agreement after final location approval.

The issue of maintenance responsibilities was also brought up at all three of the Iliamna-Nondalton Road Completion Project public hearings held in Iliamna, Nondalton, and Anchorage during February and March 2000. The Mayor of Nondalton, Tom Greene, and the Lake and Peninsula Borough Manager, Walt Wrede, understand that ADOT&PF's maintenance responsibilities for this road end at MP 2.9. They also acknowledge that prior verbal commitments have been made to the Department that upon project completion, the City of Nondalton (with possible assistance from the City of Newhalen, the Village of Iliamna, and the Iliamna-Newhalen-Nondalton Electric Cooperative) will provide routine maintenance for the remainder of the road beyond MP 2.9.

E. History of Community Support for Project

Since the Lake and Peninsula Borough nominated this project for the STIP in 1995, a lengthy process of public involvement and coordination has been pursued by ADOT&PF. The project has received overwhelming support from the local, regional, and native organizations, as well as from residents in all three communities. Written support for the project is attached in Appendix A and Appendix D. Included are letters of support from the City of Nondalton (pages A-40 and D-22); City of Newhalen (page A-253); Bristol Bay Native Corporation (page A-70); Lake and

Peninsula Borough (page D-16); Iliamna Village Council (pages A-44, A-45, and D-21); Iliamna Natives Limited (page A-43); Kijik Corporation (page A-42); and Newhalen Tribal Council (page A-46). The Nondalton City Council, by unanimous vote and approximately 95% of the total registered voters in Nondalton have endorsed the final completion of the project (page D-22). Additional written support for the project is also documented in numerous comment sheets filled out by local residents during the public meetings and hearings (refer to Appendix A and Appendix D). Resolutions in support of the project from Lake and Peninsula Borough and the Iliamna-Newhalen-Nondalton Electric Cooperative are also appended (pages A-252 and A-34, respectively).

ADOT&PF held public meetings in October 1997 in the communities of Nondalton, Iliamna, and Anchorage. The majority of written comments received were in strong support of the project. Written comments are provided in Appendix A. ADOT&PF also held three public hearings in February and March 2000 to allow public input on the Environmental Assessment. A summary of the comments is presented beginning on page 52, and a copy of the hearing transcript and actual written comments are provided in Appendix D. There was unanimous support for the project by community residents during these hearings, and most would like to see the project constructed as soon as possible.

F. Other ADOT&PF Projects Planned for the Iliamna-Nondalton Area:

1) Iliamna Airport Paving and Fencing (ADOT&PF Project No. 54739):

Construction will consist of regrading the existing gravel surfaces (runways, aprons, taxiways, and service road) adding additional crushed aggregate base course, and paving with asphalt. The project also includes constructing and paving a new taxiway and service road, installing a standby generator for the airfield lights and ARFF/SRE Building, and installing a chain link fence around most of the airport. This project is scheduled for construction in 2002.

2) Areawide Road Surfacing Design – Iliamna (ADOT&PF Project No. 55395):

This project will recondition and pave various gravel roads in the Iliamna area, including the roads from Iliamna Airport to the communities of Iliamna and Newhalen. The project is scheduled for construction in 2002.

III. ALTERNATIVES

The ADOT&PF has looked at numerous alternatives and bridge types to provide year-round overland access between Iliamna/Newhalen and Nondalton. Build Alternative No. 1, the preferred alternative, is a six span steel girder bridge over the Newhalen River and road improvements. Build Alternative No. 2, is a two span bridge and road improvements while Build Alternative No. 3 is a clear span bridge and road improvements. Build Alternatives Nos. 4, 5 and 6 include all of the road improvements described in Build Alternatives No. 1, 2 and 3, except involve different means to cross the Newhalen River. To avoid repetition, discussion of the road improvements is presented only in Build Alternative No. 1.

Build Alternatives Nos. 2 - 8 were evaluated and eliminated because they would have presented serious problems with one or more of the following: reliability, convenience, safety, constructability, or cost. Consequently, only Build Alternative No. 1 and the No-Build Alternative impacts are fully evaluated in the EA.

A. ALTERNATIVES MERITING FURTHER CONSIDERATION

1. No-Build Alternative

Under the No-Build Alternative, the existing roadway would remain unchanged with no improvements from construction activities. The existing situation, with no complete overland road connection between Iliamna and Nondalton, would prevail. The existing roadway would receive only minimal maintenance. Traffic would continue to drive off-road to bypass soft or difficult sections of the existing roadway, which would widen the footprint impacted by traffic. The trespass problems on the pioneer road/ATV trail section of the road would not be addressed. This alternative however provides baseline information on the existing road conditions and is used for comparison of probable impacts during the development and evaluation of alternatives. It is retained as a feasible alternative if impacts from the build alternative are determined as too substantial or unreasonable.

2. Preferred Alternative: Build Alternative No. 1

This Build Alternative would 1) resurface, restore and rehabilitate the existing approximately 23.17 km (14.4 mile) roadway from Iliamna to the Newhalen River, 2) construct an approximately 199.1 m (653.2') long, 5.69 m (18.67') wide, one-lane, six span steel girder bridge over the Newhalen River, 3) improve approximately 2.74 km (1.7 miles) of road/trail from the Newhalen River to the Nondalton material site to meet current roadway standards, and 4) rehabilitate the existing approximately 1.0 km (0.6 mile) roadway from the material site to Nondalton.

The completed roadway would be approximately 6.7 m (22') wide, gravel surfaced, with two traffic lanes. The roadway would be located totally within existing state right-of-way.

Drainage problems, such as side cutting at low spots around culverts and soft sections, would be corrected. The project would include installation and repair of existing culverts where necessary. Slopes would be stabilized around existing culverts above the high water mark of Bear, Lover's, and S. Fork Alexcy Creeks.

The bridge over the Newhalen River would be positioned approximately 3.54 km (2.2 miles) downstream of Nondalton near the outlet of Sixmile Lake. It would be a one-lane bridge approximately 199.1 m (653.2') long, with a 4.8 m (15.75') single lane and a 5.69 m (18.67') overall width with the ability to be widened at a future date, if necessary. The structure would be constructed of relatively short, lightweight pieces that could be easily transported to the site. Shipment of large, heavy objects to the proposed site would be difficult and expensive. The Iliamna Airport is only capable of accepting aircraft as large as the Hercules and C-133. The cargo area of a Hercules measures 2.5m x 2.5m x 13.7m (8.2' x 8.2' x 44.9') and is limited to 191 kN (21.5 tons) and the C-133 aircraft has a cargo area which measure 3.5m x 3.5m x 27m (11.5' x 11.5' x 88.6') and is limited to 312 kN (35.1 tons). If a land-sea route via Williamsport-Pile Bay Road was used bridge cargo would be placed on a barge and shipped to Williamsport then hauled over the Williamsport-Pile Bay Road. A smaller barge would then carry the material to Iliamna. From Iliamna the cargo would be trucked to the proposed site. This method of shipping would impose limits on the weight and lengths of the proposed bridge members and require expensive upgrades to the Williamsport-Pile Bay Road. The maximum length of any single member would be 18.9 m (62').

Another land-sea route was considered but due to the historical low water levels on the Kvichak River it was not considered reliable enough for a Contractor to use. That route would see the construction material barged around the Alaska Peninsula to Naknek then up the Kvichak River to Lake Iliamna, then trucked to the proposed bridge site.

Due to a construction in-water work period of mid-May to mid-July a six-span steel structure bridge would most likely be built in one or two seasons. The proposed one-lane bridge superstructure would consist of four steel stringers supporting precast concrete deck panels. A cast-in place concrete curb would support the metal bridge railing. No asphalt overlay is proposed. Scuppers would be positioned approximately every 6 m (19') along the bridge edge to drain the bridge deck. Five piers spaced about 36.0 m (118') apart would support the bridge. Each pier would consist of three 76 cm (30") diameter steel pipe piles. Four of the five piers would be placed below the ordinary high water (OHW) elevation of the Newhalen River. Each pier would cover an area of approximately 1.36 m² (14.65 ft²). No temporary in-water falsework would be needed.

Due to the elevation difference at the proposed bridge site, approximately 10 m (33') of bank would need to be excavated on the east side of the Newhalen River for the 2.3 percent bridge grade. The excavated material could be utilized in upgrading the road along the project corridor. Since the elevation on the west side of the Newhalen River would remain approximately the same, access would continue to be provided within the state's right of way to the river. Three preliminary access options are proposed (see Figure 5). Option #1 would provide unrestricted access similar to the type of access present today. Option #2 would provide a small gravel parking area and a trail to allow people access to the river. Option #3 would provide a small gravel parking area and a boat launch/ramp within state right of way.

The boat launch was added to this project as a result of ADF&G concern that without a nearby boat launch alternative, the public will access the river next to the bridge anyway and damage the river banks. All resource agencies have had a chance to review and comment on the proposed boat

launch, as it was included in the ADGC review and all permit applications. Comments were received on these three options during the EA review. The majority of commenters prefer a boat launch on Sixmile Lake within the City of Nondalton. ADF&G has agreed to partner with the City of Nondalton to locate and construct a site, however no agreement has been signed (as of 10-1-01). To ensure that a public boat launch is provided, ADOT&PF has obtained permits to construct a boat launch at the proposed bridge site as a backup measure in the event the City of Nondalton does not provide an alternative boat launch before this project is constructed.

The boat launch would consist of a ramp of concrete planks that would be approximately 4 meters (13 feet) x 12 meters (39 feet); a gravel launch access road that would be approximately 4 meters (13 feet) x 50 meters (164 feet); and a gravel parking lot that would be approximately 20 meters (65 feet) x 36 meters (118 feet).

If a boat launch is developed by ADF&G and the City of Nondalton, ADOT&PF will construct in state right-of-way, Option #2, a parking lot and access trail to the Newhalen River. The purpose of the access trail is to ensure that foot traffic does not trample the riverbank and cause soil erosion and subsequent loss of water quality. Private Property - No Trespassing signs or similar signs will be installed at the edge of state right-of-way to discourage trespass on adjacent private property.

Bridge construction and road improvements are projected to cost approximately 8.0 million dollars (2001 dollars).

B. ALTERNATIVES CONSIDERED BUT ELIMINATED

Numerous alternatives were investigated during the preliminary design for this project. ADOT&PF's Bridge Design Section prepared a report titled Newhalen River Bridge Type Selection Report (attached in Appendix C, page C-27) in which detailed alternatives analysis was done for the various bridge alternatives. Following are those alternatives that were investigated but dismissed from extensive design for the reasons stated.

1. Two Span Bridge Alternatives: Build Alternative No. 2

The bridge that was originally proposed for this site in 1972 was two salvaged truss bridges. After 25 years of storage the truss members were so damaged, corroded or missing that the bridges were donated to other organizations. A replacement structure similar to the original plan was analyzed as one of the alternatives for this project.

While the pieces of truss bridges are small and easily transported, it is very labor intensive to construct and can not be widened. The construction would take an estimated six months not including the time required to construct the 19.04 m² (205 ft²) precast midstream pier. A temporary construction bridge would be required and temporary piles would need to be driven at each of the truss panel points then removed after the truss spans were fully assembled. For these reasons, truss bridges were ruled out as a feasible alternative.

A two span steel girder bridge similar in span proportion to the truss bridge was also evaluated, but due to the long girder segments [61–76 m (200-250 ft range)] that would need to be shipped, this option was deemed unfeasible. The Iliamna Airport is only capable of accepting aircraft as

large as the Hercules and C-133. The cargo area of a Hercules measures 2.5m x 2.5m x 13.7m (8.2' x 8.2' x 44.9') and is limited to 191 kN (21.5 tons) and the C-133 aircraft has a cargo area which measure 3.5m x 3.5m x 27m (11.5' x 11.5' x 88.6') and is limited to 312 kN (35.1 tons).

2. Clear Span Bridge Alternatives: Build Alternative No. 3

Clear span alternatives that do not require permanent instream piers were examined. The two types of clear span bridges evaluated include a cable-supported bridge, and a self-tied arch bridge.

Clear span bridges are the most expensive designs having an estimated construction cost of \$8.0 million. The cable-supported bridge would require large amounts of concrete to construct the cable anchorages. Large concrete blocks would need to be positioned at the ends of the cables and would weigh more than the bridge itself. The self-tied arch bridge would require a steel arch superstructure over the deck measuring over 36.78 m (120') in height at the bridge's midpoint. Steel cables would have to be suspended from the arch ribs to provide load support. Extensive in-water work would be required to place the arch segments and temporary in-water falsework supports would be required to stabilize the superstructure during construction. A temporary work bridge would be required with additional platforms to support the trusses of the permanent bridge until the arch superstructure was complete. Platforms would need to be located along the length of the bridge on either side. These platforms would be instream piers. Extensive abutment work would be required because the entire structure weight would be carried by those two supports. For all these reasons, this alternative was not considered prudent.

3. Ferry Alternative: Build Alternative No. 4

This alternative would provide a scheduled boat crossing service for vehicles and pedestrians across the Newhalen River. If the ferry operated at the proposed bridge site described in Build Alternative No. 1, service could occur for most of the approximately nine ice-free months. The ferry would be large enough to accommodate one bus or one grader, thereby providing service for school functions and road maintenance. Up to three cars could fit on the same ferry. Boat docks would need to be built on each side of the river to accommodate passenger and vehicle loading operations. Since passengers and vehicles would need to walk or drive to the ferry, excavation of the 60' hill on the Iliamna side would be required. The quantity of excavation need would be much greater than for the preferred alternative. The ferry would require regular maintenance and oversight year-round. Full time employment for one ferryboat captain and one crew member would be required during the ice-free months.

This alternative does not satisfy the Purpose and Need for this project. It may provide reliable, safe access between Iliamna and Nondalton during the ice-free months, but it would be inconvenient, and not provide year-round access. It would also be noisy, expensive and create a potential unnecessary risk of pollution to the river and impact smaller boats when they had to wait for the ferry to cross before they could use the river or maneuver around the ferry. For these reasons, this alternative is not explored in the EA.

4. Tram Alternative: Build Alternative No. 5

A tram system and parking lots could be built at the same site as the proposed bridge in Build Alternative No. 1. A cable car would traverse the river by a pulley system operated mechanically by an operator stationed at one of the tram's termini. The cable car could be enclosed for occupant

safety and protection from the weather. The one car and one set of pulleys would allow pedestrian traffic to access both sides of the river; one direction at a time. The cable car capacity could be approximately four to eight people; no provision would be made for hauling cargo other than light loads accompanying the passengers. Tram operation could be year-round. Due to safety concerns of such a system regular maintenance and inspections would be required on the cable car and pulley system. Full-time employment would be provided for one cable car operator.

This alternative does not satisfy the Purpose and Need Statement for this project. Even though it would provide year-round access between Iliamna and Nondalton, passenger capacity would be restricted. In addition, the size and tonnage of freight hauling capability would be limited. An added expense and inconvenience to users would be the multiple sets of transportation needed to get from Iliamna to Nondalton. If you lived in Iliamna and wished to go to Nondalton you would have to leave a vehicle at the parking lot on the east side of the Newhalen River, take the tram across the river and either walk, take a boat ride, or have another vehicle parked on the west side to drive the approximately 2.3 miles to Nondalton. There is however the potential a taxi company or shuttle service would be started to provide transportation from the bridge site to Nondalton. Having more than one vehicle would pose an economic hardship to most residents. For all these reasons, this alternative is not evaluated in the EA.

5. Floating Bridge Alternative: Build Alternative No. 6

A one-lane floating bridge, placed at the same site as the proposed bridge in Build Alternative No. 1, could accommodate both pedestrian and vehicular traffic. Excavation requirements on the Iliamna side of the Newhalen River would be similar to that of the ferry alternative. Abutments would need to be buried in the river banks and pilings buried in the riverbed to hold the bridge sections against the current. No parking areas would be needed at either side of the river, since vehicles and pedestrians would be able to drive or walk across the bridge instead of waiting for a ferry or tram to become available.

This alternative does not satisfy the Purpose and Need Statement for this project. Even though it would provide a safe transportation route between Iliamna and Nondalton, it would be operational only during ice-free months. It would need to be pulled out before the ice froze and could not be reassembled until the upstream ice had floated by. In addition, navigation on the Newhalen River would be restricted during times of the floating bridge operation. The bridge would require a high level of maintenance and inspection effort over the long term. Since the Newhalen River is subject to natural freeze/thaw events a floating bridge would pose an unreliable transportation route at some times of the year. For all these reasons, this alternative is not evaluated in the EA.

6. Improve Road, No Bridge Alternative: Build Alternative No. 7

The road would be improved as described in Build Alternative No. 1. However, no bridge would be built over the Newhalen River.

Under this alternative, travel would be restricted, as it currently exists, at each side of the river. Since this alternative does not provide overland access between Iliamna and Nondalton it does not satisfy the project's Purpose and Need, and is not evaluated in the EA.

7. Build Bridge, No Road Improvements Alternative: Build Alternative No. 8

A bridge, with one travel lane as described in Build Alternative No. 1, would be constructed across the Newhalen River; however, no improvements to the existing roadway system between the Iliamna Airport and Nondalton would be done.

This alternative does not satisfy the Purpose and Need for the project. Roadway accessibility would be limited by the condition of the roadway/trail section between the Newhalen River and the Nondalton material site and uncorrected soft areas between the Alexcy Creek Bridge and the Newhalen River. Current roadway erosion and siltation problems would not be addressed. Building just the bridge and not providing a safe and reliable road system from that bridge is not prudent, and is not evaluated in the EA.

IV. ENVIRONMENTAL CONSEQUENCES

The following presents probable environmental impacts associated with or without Build Alternative No. 1. Studies conducted include a Wetlands Determination, a Cultural Resources Survey, and a Secondary and Cumulative Impacts Study.

A. Land Use

Section 4(f) of the Department of Transportation Act of 1966 (49 U.S.C. 303) states: "The Administration may not approve the use of land from a significant publicly owned park, recreation area, or wildlife and waterfowl refuge, or any significant historic site unless a determination is made that 1) there is no feasible and prudent alternative to the use of the land from the property; and 2) the action includes all possible planning to minimize harm to the property resulting from such use". However, an exception to the 4(f) requirement is if the project is concurrently planned or developed with the 4(f) resource. [See 23 CFR § 771.135 (p)(5)(v); 1987 FHWA 4(f) Policy Paper question 14, and *Sierra Club v. DOT*, 948 F.2d 568 (9th Cir. 1991)]. Approximately 1,160 linear feet of the existing road and corresponding 4.7 acres of state right of way lies within the boundary of the 4,050,000 acre Lake Clark National Park and Preserve (see Figures 1 and 6). A Section 4(f) evaluation is not required since no additional right of way is needed and the existing right of way was granted in 1976 before the park was created on December 2, 1980.

According to 23 CFR 771.135, constructive use occurs when the transportation project does not incorporate land from a Section 4(f) resource, but the project's proximity impacts are so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are *substantially impaired*. This project was analyzed for potential proximity impacts as outlined in 23 CFR 771.135, including: 1) noise impacts, 2) visual or esthetic impacts, 3) restriction on access, 4) vibration impacts, and 5) ecological intrusion which substantially diminishes the value of wildlife habitat in a wildlife or waterfowl refuge adjacent to the project. The proposed Iliamna-Nondalton Road will not substantially impair the activities, features, or attributes of Lake Clark National Park and Preserve, therefore, no constructive use will occur. ADOT&PF has coordinated with Lake Clark National Park & Preserve, and they concurred that constructive use is not likely to occur as a result of this project (personal communication, Deb Liggett, Park Superintendent, November 26, 2001).

The project has been reviewed several times by the Lake and Peninsula Borough, the City of Nondalton, and the Village of Iliamna. Correspondence in Appendixes A and D indicates governing bodies favor improving the Iliamna-Nondalton Road and constructing a bridge over the Newhalen River. The City of Nondalton, City of Newhalen, Village of Iliamna, and the L&PB have all passed resolutions in support of the project. The local and regional native organizations have also provided letters of support for this project. (Refer to letters of support from Bristol Bay Native Corporation (page A-70); Iliamna Village Council (pages A-44, A-45, and D-21); Iliamna Natives Limited (page A-43); Kijik Corporation (page A-42); and Newhalen Tribal Council (page A-46)).

The Bristol Bay Area Plan for State lands establishes guidelines for construction of inter-community roads to support local transportation needs where 1) communities are close together, 2) alternate transportation options are more costly and less dependable, and 3) there is strong local

support. This project meets all three criteria. This project complies with applicable coastal management policies. A final coastal consistency determination from the Division of Governmental Coordination was received 2/23/01 (attached in Appendix C, page C-41) The Lake and Peninsula Borough Permit was received on 2/14/00 (attached in Appendix C, page C-67).

This project is compatible with area joint land development projects. The road to the Tazimina River Hydroelectric facility begins at approximately Mile 9.3 of the Iliamna-Nondalton Road. During INNEC hydroelectric facility construction, the Iliamna-Nondalton Road was upgraded in some places to accommodate construction trucks and equipment bound for the power plant.

The No-Build Alternative would result in no change to land use or development patterns.

B. Farmland

There are no prime or unique agricultural lands, as defined in the Farmlands Protection Policy Act of 1981: 7 U.S.C. 4201-4209 (P.L. 97-98), currently designated in the State of Alaska. The Farmland Protection Act is not applicable to this project and no formal consultation with the Natural Resource Conservation Service is required.

C. Social

This project has been reviewed, and is in compliance with Executive Order 12898. E.O. 12898 requires Federal agencies, to the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, to achieve environmental justice as part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects, including interrelated social and economic effects, of its programs, policies, and activities on minority populations and low-income populations in the United States. The intent of E.O. 12898 is only to improve the internal management of the executive branch. The order does not provide for judicial enforcement.

No disproportionately high or adverse effects on minority or low income populations will result from this project, as outlined in E.O. 12898. ADOT&PF did not exclude any persons or populations from participation in, deny persons or populations the benefits of, or subject persons or populations to discrimination under the NEPA process because of their race, color or national origin.

This project has received overwhelming support from the local, regional, and native organizations, as well as from residents in all three communities. Written support for the project is attached in Appendixes A and D. Included are letters of support from the City of Nondalton (pages A-40 and D-22); City of Newhalen (page A-253); Bristol Bay Native Corporation (page A-70); Lake and Peninsula Borough (pages A-252 and D-16); Iliamna Village Council (pages A-44, A-45, and D-21); Iliamna Natives Limited (page A-43); Kijik Corporation (page A-42); and Newhalen Tribal Council (page A-46). The Nondalton City Council, by unanimous vote and approximately 95% of the total registered voters in Nondalton have endorsed the final completion of the project (page D-22). In addition, two separate petitions documenting support of the project were circulated through the communities in 1996 and in 2000. The 1996 petition was signed by 122 local

residents, and the 2000 petition was signed by 64 local residents. Additional written support for the project is also documented in numerous comment sheets filled out by local residents during the public meetings and hearings (refer to Appendix A and Appendix D). Resolutions in support of the project from Lake and Peninsula Borough and the Iliamna-Newhalen-Nondalton Electric Cooperative are also appended (pages A-252 and A-34, respectively).

ADOT&PF held public meetings in October 1997 in the communities of Nondalton, Iliamna, and Anchorage. The majority of written comments received were in strong support of the project. Written comments are provided in Appendix A. ADOT&PF also held three public hearings in February and March 2000 to allow public input on the Environmental Assessment. A summary of the comments is presented beginning on page 52, and a copy of the hearing transcript and actual written comments are provided in Appendix D. There was unanimous support for the project by community residents during these hearings, and most would like to see the project constructed as soon as possible.

This project would in fact benefit the neighboring communities by providing better access to friends and family, reduced shipping costs, provide more employment opportunities, and reduce commuting time for those residents that live in one village but work on the other side of the river. Numerous Iliamna and Nondalton residents have stated that they would visit their friends and family more frequently if a more economic means were available to get across the Newhalen River.

Property values in Nondalton may increase slightly due to better accessibility. Community cohesion would be enhanced, since the improved road would allow greater social interaction between the three communities. There would be increased recreational opportunities as residents of all three communities would be better able to participate in events and activities in communities other than their own. The school district would benefit from decreased costs of transporting students between schools for activities. Students would be able to participate with other area schools and share various teaching and extra curricular resources. Currently some activities can not be offered in Iliamna or Nondalton due to the low numbers, but the school district has indicated that if the two communities were connected by a bridge they would try and share resources and offer more classes and events. The linking of the communities would enhance opportunities for joint regional development measures such as a regional hospital, a home for elders, and a regional landfill. Public safety would be greatly improved, allowing safer and expedited emergency response times, improved safety officer response times, better traffic safety, and a fire escape route in the event of a fire in Nondalton.

The majority of local residents use ATVs for motorized transportation, with a few residents using cars and trucks. This trend of using ATV's would be expected to continue, as the cost of transporting, maintaining, and operating full size vehicles in this area is costly.

The utilization of the Newhalen River fisheries and recreation use of the river exhibits a pattern of increasing use and ADF&G personnel have noted increased usage of the more remote areas by those desiring a true wilderness experience. This project should not change this pattern.

The No-Build Alternative would result in little or no changes in current social conditions or trends.

D. Relocation

Construction of Build Alternative No. 1 would not require the relocation of any residential or commercial properties. ADOT&PF owns sufficient right-of-way for the proposed project. A DNR Right of Way permit was obtained to accommodate the installation of bridge piers and fill in the Newhalen River.

The No-Build Alternative would not involve any changes to the existing roadway right-of-way corridor.

E. Economic

The project could provide improved economic development and opportunity for area residents. Retail sales could benefit from ease of access and create more local demand for goods and services. The transport and exchange of goods and services could be enhanced with a reliable, cost effective, and timely transportation route. The cost to transport fuel to Nondalton could be greatly reduced, since the small boat or plane transport link could be eliminated. The Mayor of Nondalton (Tom Greene) has stated he believes the cost of transporting many goods from Iliamna to Nondalton via the road could be reduced by 25 percent or more.

This project would continue to provide reliable, improved access to the Tazimina River Hydroelectric facility access road. That facility, in turn, provides an economic benefit to the communities of Iliamna/Newhalen and Nondalton by providing less expensive, clean, renewable power to local residences and businesses. The operation will not expand as a result of the proposed project, however, the improved road and a bridge across the Newhalen River will make their operations more efficient, from an economic standpoint. The General Manager of the Iliamna-Newhalen-Nondalton Electric Co-op (INNEC) has stated that the lack of a bridge to Nondalton actually affects the overall efficiency of the entire electric co-op operation. They once calculated that it cost nearly 33% more to construct or repair electric utilities in Nondalton due to the extra costs incurred by the lack of a bridge. These costs included having to handle materials and poles several times to get them to Nondalton and reduced efficiency of crews since they have to leave their service trucks behind and cross Newhalen River in skiffs or by snow machine. (Personal communication, INNEC, Jerry Armstrong, September 17, 2001.)

Some beneficial economic impacts to the local economy are expected to occur during construction activities. Local residents, depending on their expertise could be hired to perform the work while local businesses could benefit from the influx of workers and their needs. Since the road between Iliamna and Fish Camp already provides a vital transportation link for some local residents, access would be maintained during construction of this project. Stipulations requiring that reasonable access be maintained between Iliamna and Fish Camp will be incorporated into the contract. No long-term road closures will be allowed during construction.

Under the No-Build Alternative there would be no substantial changes in local development, tax revenues, federal expenditures, employment opportunities, and accessibility.

F. Considerations Relating to Pedestrians and Bicyclists

There is little pedestrian and bicycle travel between Iliamna/Newhalen and Nondalton. Current use is limited by the travel distance, remoteness, dusty road condition, and lack of a safe and convenient means to cross the Newhalen River. Pedestrian and bicycle travel would be much improved with the road improvement project. Due to low traffic volumes, pedestrians and bicyclists would share the roadway with the motorists. A separated bike path and/or pedestrian sidewalk is not proposed as it is anticipated that they would not be utilized to a high degree by local residents, as motorized vehicles are the preferred form of travel.

Pedestrian access to the Newhalen River at the bridge site would be provided with all three of the proposed bridge access options. During the review of the preliminary draft Environmental Assessment ADF&G, NMFS and USF&WS requested various degrees of access at the bridge site be assessed and designed to prevent long term erosion and water quality problems. As a result of their request three access options for this site were proposed in the EA (see Figure 5). After public and agency review and comment on the EA, ADOT&PF decided to provide an access trail and parking lot at the bridge, but will not build a boat launch if the City of Nondalton and ADF&G can reach an agreement to build a launch on Sixmile Lake within the city of Nondalton.

Under the No-Build Alternative, the riverbank at the proposed bridge site would continue to be trampled by foot traffic and associated erosion would continue to occur.

G. Air Quality

The proposed project is located within an air quality attainment area. Thus, air quality is good and meets or exceeds the U.S. Environmental Protection Agency (EPA) criteria for "healthy" air conditions.

Temporary degradation of air quality during construction would be expected due to operation of heavy construction equipment and the moving and placing of exposed soil surfaces (see Construction Impacts section). The impact to village residents should be minimal due to the distance of the village centers to the road and/or proposed bridge site.

The No-Build Alternative would be expected to have minimal impact on existing air quality. A small increase in vehicular traffic would increase airborne particulate levels thereby diminishing existing air quality.

H. Noise

Noise impacts from a roadway occur when predicted and/or actual noise levels after construction approach or exceed the FHWA noise abatement criteria, or substantially exceed existing noise levels. The FHWA designates the threshold of noise impacts as 72 decibels (dBA) for commercial receivers and 67 dBA for residential receivers. ADOT&PF considers an increase of 10 – 15 dBA to be a substantial increase in noise levels and 65 dBA to be the threshold for noise abatement.

No cluster or high density residences, or sensitive noise receivers (churches, schools or hospitals) are located along the project corridor. Single family residences are at least 305 m (1,000 feet) from the road and due to the low traffic volumes actual and predicted noise levels are below FHWA and ADOT&PF thresholds. No noise abatement measures are proposed for this project

The No-Build Alternative would result in little or no increase in projected noise levels.

I. Water Quality

This project should improve the existing water quality problems that presently exist. First, it is now necessary to drive vehicles and heavy equipment across the Newhalen River to access the other side of the river. As an example, the Alaska Department of Fish & Game (ADF&G) has had to issue the City of Nondalton permits to drive its heavy equipment in the river so it can maintain the remainder of the road to Iliamna. Vehicles that are driven across the riverbed disturb fish habitat and vehicles that disturb new tundra are potentially creating an erosion problem.

Second, the existing road has some erosion and drainage problems. This situation results in unnecessary environmental damage along the road corridor. For example, ADF&G has reported that there is erosion taking place at various points adjacent to the road (see Figure 13) and at the steep bank to the Newhalen River at the terminus of the road from Iliamna. The base of the steep bank is a primary site used by local residents to beach their skiffs for transporting people and goods across the Newhalen River. The erosion problem at the steep bank is aggravated by people climbing up and down the bank and by wave action from the skiffs which cross the river at this point. The road also has drainage problems in certain areas. This frequently results in large sections of the road becoming impassable due to mud. During these periods, vehicles drive around the poorly drained areas which causes the footprint of the road to become wider and wider, and results in unnecessary damage to the adjacent tundra and stream crossings (see Figure 12).

It is anticipated that this project will improve the overall water quality of adjacent water bodies and wetlands along the Iliamna-Nondalton Road. Proposed improvements to repair and/or install culverts, embankment stabilization to prevent and correct existing gully erosion (see Figure 11), and replacement of volcanic “soft spots” with stable material will result in better water quality and fish habitat in water bodies adjacent to the road. In addition, an improved roadway should reduce the occurrence of off-road driving thereby improving the quality of the adjacent water bodies, which are sometimes crossed.

The road embankments at the Bear Creek, Lovers Creek, South Fork Alexcy Creek and Alexcy Creek crossings have eroded substantially (refer to photos and Figure 1). These embankments will be stabilized using tiers of gabions to create inlet and outlet headwalls. At Bear Creek, an outlet apron of class II riprap extending 9 meters (30 feet) downstream of the outlet will be installed in the streambed. At Lovers Creek, an outlet apron of class II riprap extending 6 meters (20 feet) downstream of the outlet will be installed in the streambed.

Between Alexcy Creek and the material site south of Nondalton, road improvements will include reconstruction or installation of the roadway base and road surfacing, as well as installation, extension or replacement of culverts at several stream crossings to improve the water quality and drainage (culvert locations shown on Figure 1). Culverted crossings of fish bearing waters are identified at project stations 55+700 (formerly 55+720), 56+100 (formerly 56+113), 56+560 (formerly 56+709), and 56+700 (formerly 56+780). Between Nondalton and the material site south of the village, the existing road will be resurfaced and rehabilitated with two culverts to be replaced, one at station 57+358 (formerly 57+360) and the other at 57+517 (formerly 57+518).

At each culvert, class I concrete inlet and outlet headwalls will be used and a riprap apron will be installed in the streambed upstream of the inlet and downstream of the outlet to prevent scouring and erosion. All of the culvert inlet and outlet riprap aprons will be underlain with geotextile fabric and will be installed to a thickness of at least 394 mm (15.5 inches) for class I riprap, 787 mm (31 inches) for class II riprap, and 1181 mm (46.5 inches) for class III riprap. At each of these culvert inlets, riprap will also be placed on the road embankment from 1.4 – 1.5 meters (4.5 to 5 feet) above the culvert invert or to 279 mm (11 inches) above the top of the adjacent streambank, whichever is less. On the outlet of the culverts, riprap will also be placed on the road embankment from 0.9 – 1.2 meters (3 to 4 feet) above the culvert invert or to 279 mm (11 inches) above the top of the adjacent streambank, whichever is less. This will improve water quality of these streams by preventing or minimizing future erosion of the embankments.

Low traffic volumes should not result in roadway contaminants entering open water areas. Current (2001) Average Daily Traffic (ADT) is only 91 vehicles per day. Traffic projections indicate that the ADT will increase to 96 by the year 2003, 108 by the year 2008, and 122 by the year 2013. Runoff water from highly traveled roadways usually contains small quantities of roadway contaminants, such as oil, grease, and exhaust residues. However, since this roadway will have low traffic volumes, runoff water will contain minimal contamination. The clean gravel surface of the proposed road should result in fewer sediments in runoff than the existing road surface along most of the project corridor, which is high in silt content.

The proposed location of the bridge is at a stable and relatively straight stretch of the river where there is no active river erosion (i.e. migration of the channel meander). Due to the close proximity to Sixmile Lake, the water levels do not vary much under flood conditions. It is reasonable to expect the water flow and water quality at the site to remain relatively uniform. Rainfall on the proposed Newhalen River bridge will drain to scuppers (holes in the bridge deck) and fall into the river. The low volume of traffic and low rainfall in the area should result in minimal water quality impacts to the river. Bridge deck drainage to scuppers rarely transport much suspended sediment. With sheet flow, such as occurs with rainfall on pavement, there is simply not enough energy involved for movement of much sediment (e-mail message of 12/6/99 from Mark Miles, P.E., to Jerry Ruehle). No discharge permit is required for bridge scuppers. DEC has issued a Section 401 water quality certification for this project.

The runoff from the new embankment on the Iliamna side, near the Newhalen River, will be directed away from the bridge and treated prior to being discharged into the river. Special lined ditches, rock check dams, rock blankets and other erosion control measures will be considered during the design phase of this project to reduce erosion and treat sediment laden runoff before it enters the Newhalen River.

No direct impact to groundwater quality or potable water sources will occur. Dispersion of contaminants will be minimized by maintaining vegetation buffers where possible, using porous embankment materials, building rock ditch dams and by the generally flat grade, which will serve as a natural filter.

The goal of the Department's Erosion and Sediment Control Plan will be to have zero impact on receiving waters. However, it is likely that some degradation of the Newhalen River water's quality will temporarily occur during construction. These impacts will be minimized to the greatest extent practicable by use of ADOT&PF Best Management Practices. All reasonable measures to keep these impacts to a minimal level will be taken. The ADF&G permit includes an instream work timing window of May 15 through July 15 for the Bear Creek culvert baffles and outlet apron and construction of the Newhalen River bridge. Other inwater work does not have a timing window.

Prior to construction the Department will prepare an Erosion & Sediment Control Plan. This plan will be submitted to ADEC for approval along with project drainage plans. The Construction contractor will develop and implement a Stormwater Pollution Prevention Plan complying with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Permit. Best Management Practices will be implemented during and after construction to minimize erosion and sedimentation. Temporary degradation of water quality may result during construction; however, these impacts should not be significant or long-term.

ADF&G, ADEC, and L&PB specifically reviewed the project to ensure there will be no discharge of suspended or settleable solids that will adversely impact either fish or fish habitat. To ensure the project is consistent with this policy, ADGC's Final Coastal Consistency Determination includes the following stipulations:

- The slurry and sediment laden water removed from each pile prior to filling with concrete must be collected and disposed in an approved area. Slurry and sediment laden water shall not be discharged into the Newhalen River.
- Each bank cut, slope, fill, bottoms of road side ditches, and exposed earth work attributable to the project, especially during culvert installation and road building activities, and at the east approach at the Newhalen River bridge, must be stabilized to prevent erosion both during and after project construction.
- DOT/PF shall install silt fences or implement other methods necessary to filter or settle suspended sediment from drainage wastewater from the roadway construction prior to direct or indirect discharge into existing surface waters or wetlands. Any structure must be maintained until disturbed or deposited material has been stabilized against erosion. Special attention shall be given to collection and treatment of road embankment, road cut, and road surface runoff to the road-side ditches located at the bridge approach on the east side of the Newhalen River. This stipulation covers not only the construction phase of the project, but also the roadway's permanent design.

The No-Build Alternative would result in continued degradation of water quality in the area, as existing erosion and stream sedimentation problems would go unchecked.

J. Permits and Clearances Required

Due to this projects involvement in wetlands a Section 404/10 permit from the U.S. Army Corps of Engineers has been acquired (attached in Appendix C, page C-1). Pursuant to the “Interagency Working Agreement to Integrate Section 404 and Related Permit Requirements into the National Environmental Policy Act” this project was “merged” and the analysis and coordination documented in this Environmental Assessment was used in the Section 404/10 process decisions.

Permit applications were submitted to the appropriate agency for public notice concurrent with the NEPA review period. All permit applications, or the permit, are included in Appendix C. The following permits and clearances would be required for the building of Alternative No. 1. Since regulations and laws change, this list may change prior to construction.

1. U. S. Army Corps of Engineers, Section 404/10 Permit
2. U. S. Coast Guard (USCG), Section 9 Permit
3. Alaska Division of Governmental Coordination, Coastal Consistency Certification
4. Alaska Department of Environmental Conservation, Section 401 Water Quality Certification
5. Alaska Department of Fish and Game (ADF&G), Title 16 Permits
6. Lake and Peninsula Borough Development Permit
7. U.S. Environmental Protection Agency, National Pollutant Discharge Elimination System Construction Permit (to be obtained at the time of construction)
8. ADNR Early Entry Authorization

The proposed bridge site was permitted by the USCG (P108-75) and ADF&G (17-05-75) in August 1975 and renewal applications submitted again in 1983/4. However due to funding constraints the bridge was never constructed. New applications were submitted to both agencies. A Fish Habitat Permit (FG 01-II-0074) was issued March 2, 2001 for Alternative No. 1, the preferred alternative (attached in Appendix C, page C-59). The US Coast Guard application is currently being processed.

No permits, certifications, or clearances would be required for the No-Build Alternative.

K. Wetlands

On October 4, 1996 the USCOE conducted an on-site jurisdictional wetland determination and determined based on that visit, aerial photography, and additional information that wetlands would be impacted by the proposed project. It was determined that the proposed road upgrade portion from Iliamna to the Newhalen River would only impact riparian wetlands in the areas of the culvert extensions. Although the October 4, 1996 inspection team was unable to inspect the Nondalton side of the river, subsequent field observations indicate the area is similar to the Iliamna side (uplands, except in culvert locations). The site visit revealed minimal amounts of wetlands near existing culverts and in the vicinity of the Newhalen River. There are no wetlands on the east bank of the Newhalen River in the vicinity of where the roadway would be reduced in height to match the lower west bank.

Approximately 33,650 cubic meters (44,000 cubic yards) of fill will be discharged into 1.74 hectares (4.3 acres) of waters of the U.S., including wetlands, for the installation of culverts and

associated riprap aprons. The majority of the wetlands to be filled as a result of this project are on the Nondalton side of the river, where the use of ATV's has severely degraded the functional value of these wetlands. ATV's tend to drive around the poorly drained areas which causes the footprint of the road to become wider and wider, and results in unnecessary damage to the adjacent wetlands and stream crossings. Construction of the road will keep ATV's and other vehicles from driving through the wetlands adjacent to the road, which will result in improved functional value of the remaining wetlands that are not filled as a result of this project. The functional values of the streams will also be improved by this project since the culverts will be made to adequately pass fish, and the riprap aprons will prevent further scouring and erosion, which will improve the water quality of the streams.

An additional 105 cubic meters (136 cubic yards) of fill (riprap) will be placed below ordinary high water (OHW) of the Newhalen River for the east side abutment. The riprap will be installed beneath the existing streambank and riverbed surface profiles so that the top of the riprap will not protrude above streambank or streambed contours. This work is anticipated to have little effect on the overall functional value of the river at this location. There is no known spawning in this reach of the river; it only serves as a migration corridor. Due to the substantial width of the channel, fish migration will not be hindered by the presence of the piers or the riprap. In addition, all in-water work will be conducted between May 15 and July 15 to avoid impacts to fish during construction (refer to ADF&G permit, page C-62).

The bridge crossing will improve the stream bank vegetation in the immediate area, since less traffic (pedestrians, four-wheelers, and heavy equipment) will access the river by traversing this area. The new approaches will place little fill in the river. The Corps of Engineers concluded in their permit evaluation and decision document that the bank habitat in this reach of stream will be improved.

Piers placed into the Newhalen River will support the bridge. The hydrology at the site will not change from the existing natural condition even with the addition of 4 of 5 piers below ordinary high water (OHW). The "Newhalen River Bridge Type Selection Report, 1998" explains that each pier will consist of three 76 cm (30 inch) diameter steel pipe piles with pre-cast pier caps. The total displaced riverbed area for all five piers will be less than 6.8 m² (73 ft²). The natural riffle and pool character of the river will be preserved. The bridge supports will cause minor circulation eddies at flood stage. Ice will potentially back up against the piles, however, the piers will be designed to withstand the anticipated ice load.

The proposed project will be designed to avoid and minimize where possible impacts to wetlands and best management practices during construction will be implemented to minimize impacts to adjacent wetlands. Most of the culvert improvements will be through the established roadbed. The preferred alternative will include all practicable measures to minimize wetland impacts when wetlands can not be avoided. The original road was authorized by USCOE permit 4-830477, Newhalen River 4 which included the bridge approaches and abutment work, but due to funding constraints only a portion of the roadwork was completed. Alternative No. 1, the preferred alternative, is authorized by USCOE permit 2-830477, Newhalen River 4 (see Appendix C).

Only Practicable Alternative Finding

Executive Order 11990, Protection of Wetlands, requires that there be no practicable alternative to the proposed action and that the project include all practicable measures to minimize harm to wetlands.

ADOT&PF has analyzed the project, and determined that there are no practicable alternatives having less impact on the aquatic ecosystem and without other significant adverse environmental consequences that do not involve discharges into waters of the U.S. Other locations and routes were considered for the project. However, since there is already an existing road/trail to the proposed bridge site, any different site would cause equal or greater wetland degradation. Other designs were considered, but rejected. The proposed design utilizes the existing, already disturbed road right-of-way.

ADOT&PF in conjunction with federal, state, and local resource agencies developed the following design features and mitigation plan to minimize harm to wetlands. These stipulations are included in the project permits, which will become a binding part of the construction contract.

1. Work in the Newhalen River and in Bear Creek shall only occur from May 15 through July 15.
2. Installation of the riprap on the east bank of the Newhalen River will either be completed when the site is naturally dewatered, or measures will be taken to isolate and dewater the site from the flowing water of the river.
3. The slurry and sediment laden water removed from each pile prior to filling with concrete will be collected and disposed in an approved area. Slurry and sediment laden water will not be discharged into the Newhalen River.
4. The Contractor shall provide effective control of erosion and surface water run off from the road into adjacent streams and wetlands during construction.
5. Each bank cut, slope, fill, bottoms of road side ditches, and exposed earth work attributable to the project, especially during culvert installation and road building activities, and at the east approach at the Newhalen River bridge, will be stabilized to prevent erosion both during and after project completion.
6. Equipment servicing and fueling operations will not occur within the annual floodplain or within 30.3 meters (100 feet) from any river, stream, drainage channel, or waterbody. Adequate sorbent materials will be kept on site to be used to contain and cleanup any spill of petroleum products.

Based upon the above considerations, it is determined that there is no practicable alternative to the proposed construction in waters of the U.S., and the proposed action includes all practicable measures to minimize harm to wetlands that may result from the project. The COE issued its Section 404 permit for the project on March 16, 2001.

The No-Build Alternative would continue to impact the wetlands adjacent to the streams from sluffing and erosion.

L. Water Body Modifications

Waterbody modifications, including placement of riprap along stream banks and pier installation, will occur to the Newhalen River as a result of bridge construction. The Newhalen River has been deemed a Category 3 waterway and determined navigable by the Department of the Army Alaska District and the USCG. The proposed bridge will be located at approximately Rivermile 24, approximately 3.54 km (2.2 miles) downstream of Nondalton near the outlet of Sixmile Lake where minimal debris or icing problems occur. The "Newhalen River Bridge Hydraulics and Hydrology Report", 1998 states the proposed bridge location is located on a section of the river that is relatively straight, non-tidal, and no active river erosion seems to occur here. The hydrology at the site will not change from the existing natural condition even with the addition of 4 of 5 piers below ordinary high water (OHW). The "Newhalen River Bridge Type Selection Report", 1998 (attached in Appendix C, Page C-27) explains that each pier will consist of three 76 cm (30 inch) diameter steel pipe piles with pre-cast pier caps. The total displaced riverbed area for all five piers will be less than 6.8 m² (73 ft²). The bridge has been designed so that the original streambed contours will be retained, and the channel will not be constricted. The riprap will be dug into the substrate so that its final elevation is at the same level as the riverbed and will not cause a change in the direction or velocity of the stream flow.

Section 10 of the Rivers and Harbors Act of 1899 requires that a Department of the Army permit be obtained for certain structures or work in or affecting navigable waters of the United States prior to conducting the work (33 USC 403). Alternative No. 1, the preferred alternative, is authorized by USCOE permit 2-830477, Newhalen River 4 (see Appendix C).

A U.S. Coast Guard (USCG) permit is also required for this work. A permit application has been sent to the USCG Aids to Navigation, and is pending approval of the revised EA and issuance of the FONSI by FHWA.

In addition to the work proposed for the Newhalen River, culverts will be extended or replaced as part of this project to prevent a backwater effect upstream of the road embankment, to prevent further erosion, and to maintain fish passage, where necessary. These culvert improvements are described in detail under Section I – Water Quality and in the ADF&G permit (page C-59). The ADF&G permit requires that the streams be temporarily diverted around the work area during construction of these culvert improvements (refer to stipulations on page C-62 through C-64). A constant flow with sufficient quantity to support the fish living in that stream will be maintained. Upon completion of the work, the streams will be returned to their original alignment.

The No-Build Alternative would result in continued siltation to existing water bodies.

M. Floodplain

Per Executive Order 11988: Floodplain Management, as amended by Executive Order 12148, DOT Order 5650.2, and 23 CFR Part 650, this project was assessed for impacts to the floodplain. E.O. 11988 requires that no Federal action be developed within the base floodplain unless there is no practicable alternative. Only a small portion of the project crosses the Newhalen River

floodplain. The floodplain would have to be crossed by any alternative to provide road access from Iliamna to Nondalton. Therefore, avoiding the floodplain with this transportation facility is not practicable.

The east bank of the Newhalen River is approximately 18.3 m (60 feet) higher than the floodplain riverbank on the west side. The bridge piers, bridge abutments, and a portion of the boat launch ramp will be located in the floodplain; however, the hydraulics and hydrology report indicates the proposed bridge will not cause any measurable backwater. The 100-year flood elevation is 76.5 m (256.9 feet) above Mean Sea Level (MSL). Bridge low steel will be 79.67 m (261.4 feet) at abutment 7 and 82.80 m (271.6 feet) at pier 3, the low end of the navigation window.

Approximately 353 cubic meters (462 cubic yards) of riprap would be placed in the 100-year floodplain [168 cubic meters (220 cubic yards) at abutment 1, and 185 cubic meters (242 cubic yards) at abutment 7]. Figure 3 shows the 100-year floodplain in relation to the proposed bridge. The riprap will be keyed in below the riverbed so as not to constrict the natural stream channel. In accordance with 23 CFR Part 650, ADOT&PF conducted a Location Hydraulic Study (see Appendix C, page C-22). As summarized in the report, the measures to minimize floodplain impacts include designing and installing an adequately sized structure that will limit the increase in backwater, and adequately pass the 50-year and 100-year floods without significant damage to the floodplain, bridge, or embankment. The preferred alternative will be designed to minimize floodplain impacts and will not support any incompatible floodplain development. There are no practicable alternatives to the proposed encroachment that will serve to reduce the hydraulic impacts presented by the encroachment. The proposed facility conforms with all applicable State and Federal floodplain regulations.

To insure that development in the L&PB complies with the Comprehensive Plan, Coastal Management Plan and other plans and policies the Borough has adopted, a L&PB Development Permit was acquired (see Appendix C, page C-67). Most projects that require excavation and placement of more than 10,000 ft², or a quarter of an acre of fill within 30.3 m (100 feet) of an anadromous stream (the Newhalen River) require this permit. The intent of this permit system is to protect "valuable natural resources, watersheds and fish habitat". Pursuant to FEMA National Flood Insurance Program Regulations 44 CFR Part 60 this project should lessen the risk of erosion losses within the floodplain.

The No-Build Alternative would result in continued erosion within the floodplain at both sides of the river bank due to foot traffic and vehicular traffic accessing the river, but it wouldn't require placement of fill in the floodplain.

N. Wild and Scenic Rivers

As defined in the Wild & Scenic Rivers Act, P.L. 90-542 as amended, there are no wild or scenic rivers located in the area of the proposed project (Alaska Rivers in the National Wild and Scenic Rivers System, National Park Service, 1990).

O. Coastal Barriers /Coastal Zone

The Coastal Barriers Resources Act of 1982 P.L. 97-348, prohibits federal financial assistance for development within the Coastal Barrier Resources System, which consists of undeveloped coastal barriers along the Atlantic and Gulf coasts. As defined in the Act no barrier resources exist along the Alaska coast.

The Coastal Zone Management Act of 1972 and Reauthorization Amendments of 1990 require all projects to comply with the State of Alaska Coastal Zone Management Plan. The ADGC initiated the consistency review of this project by the local coastal zone office (L&PB) concurrent with the review of this document and found the project consistent on February 23, 2001 (see Appendix C.)

P. Threatened and Endangered Species

There no Threatened or Endangered species pursuant to the Threatened and Endangered Species Act of 1973, as amended: 16 U.S.C. 1531-1543 (P.L. 93-205) in the project vicinity (personal communications, USFWS, Gary Wheeler and NMFS, Jeanne Hanson, October 5, 1998).

Q. Fish and Wildlife

The project area is not recognized as a brown bear spring concentration area nor is it an area of known den concentrations. Bears concentrate miles downstream near the low stream banks during the summer and fall in search of fish, not near the bluff area near the proposed bridge site.

Bird observations along the road corridor and near the proposed bridge site indicate low densities. During the summer various passerine birds, waterfowl, and shore and water birds use the wetlands, tundra and shrubs adjacent to the existing road corridor, but most prefer the undisturbed areas miles way from the road corridor. Only a few species spend the winter in the area. The majority of the birds migrate south in the fall. ADF&G has stated there is no known occurrence of any sensitive wildlife populations using the project corridor.

The Secondary and Cumulative Impacts Study (SCIS) indicates the proposed project is not expected to induce substantial growth in tourism for any purpose, including sport fishing and hunting. While it is likely that some sport fishing and hunting will increase with better access, most growth is expected to increase with or without this project. Neither ADF&G or other resource protection agencies raised a concern that road improvements and bridge construction would have negative impacts on fish populations or sport fishing opportunities. Since the majority of the roadway has existed for many years, we do not expect a significant increased harvest of fish and wildlife as a result of the proposed reconstruction. ADF&G has stated that the issue of potential secondary and cumulative impacts to fish and wildlife was adequately addressed in the EA and in the SCIS (personal communication, ADF&G, Wayne Dolezal, October 1, 2001).

Subsistence

Testimony at the public hearings by those who subsist in the area indicated wide-spread support for the road and bridge project. According to Nondalton Tribal Council members, little subsistence hunting or trapping by area residents occurs along the existing roadway, as wildlife densities are generally low adjacent to the road corridor. Little change to this situation is expected with project construction. The project area is not recognized as an important area for moose calving, rutting, or winter feeding. The closest documented important use area for caribou is west

of the project area about 24.14 km (15 miles) around the upper drainage of Upper Talarik Creek and ADF&G has no records of any important trapping areas for fur-bearers in the project area.

Opposition to the boat launch portion of the project was based on potential impacts with subsistence fish camps. However, this opposition was not because access for subsistence would be curtailed, but concern that those launching boats would damage nearby camps, trash the area, and act inappropriately around bears. ADOT&PF, in consultation with the Borough and fish and wildlife resource agencies, incorporated into the project description the installation of signage warning of private property and the need for proper disposal of refuse. The boat launch near the bridge will not be constructed if the City of Nondalton signs an agreement with ADF&G to construct a boat launch on Sixmile Lake. As of 12/31/01, no agreement has been signed.

ADF&G has stated that the issue of potential secondary and cumulative impacts to subsistence use of fish and wildlife resources is adequately addressed in the EA and in the SCIS, and that they have no objection to the project, provided the stipulations in the Title 16 Permit No. FG 01-II-0074 are followed (personal communication, ADF&G, Wayne Dolezal, October 1, 2001).

Southwest Alaska Rainbow Trout Management Plan

In February 1990 the Alaska Board of Fisheries adopted the ADF&G Division of Sport Fish Southwest Alaska Rainbow Trout Management Plan, which provides policy guidance for rainbow management and emphasizes conservative wild stock management. The Newhalen River falls within the Plan's 54,700 square mile area. However the river is not considered "Special Management Waters". It does have various sport fishing restrictions including unbaited single hook artificial lures, no fishing from April 10 through June 7 and no helicopter access allowed for sport angling. The plan is intended to "protect the biological integrity of the region's wild rainbow trout stocks, provide recreational benefit to all users and maximize the economic potential of the area and state". The plan recognizes "growth in the region's rainbow trout sport fisheries is inevitable" and the plan should not "preclude limited harvest of rainbow trout for food or trophies". ADF&G does not anticipate that the recreational fishing value of the trout population will be diminished as a result of this project, or that construction of this project will result in negative impacts to the rainbow trout population (refer to page C-52, ADGC Final Consistency Determination). There may be rearing rainbow in this reach of river, but they would be expected to spawn in the tributaries, not in the mainstem (personal communication, ADF&G, Wayne Dolezal, December 29, 1999). ADF&G does not consider this project to conflict with the Southwest Alaska Rainbow Trout Management Plan (personal communication, ADF&G, Wayne Dolezal, October 1, 2001).

Essential Fish Habitat Assessment

The Magnuson Stevens Fishery Conservation and Management Act of 1996 [16 U.S.C. 1801 et seq.] provides for the designation and conservation of Essential Fish Habitat (EFH). Defined by Congress, EFH seeks to minimize adverse effects on "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity." On July 14, 1999 ADOT&PF notified NMFS that this project may have an effect on EFH and stated that an assessment would be provided in the EA. The proposed project is described on pages 9 and 10 of this document and the effects of the project are described in Section IV. Environmental Consequences and in Appendix B, a report titled "Secondary and Cumulative Impacts Study of the Proposed Iliamna-Nondalton

Road Reconstruction". The Newhalen River and its tributaries are important producers of salmon and other fish utilized by commercial, recreation, and subsistence users. A concerted effort would be employed in the design and construction of this project to minimize the impact to the resources.

In accordance with ADF&G recommendations, this project includes plans to improve fish stream habitat along the project corridor. An ADF&G Title 16 permit has been obtained for the proposed work in anadromous and resident fish streams (attached in Appendix C, page C-59). These plans include providing permanent erosion control measures around fish streams, providing baffles and step pools to improve fish passage, and installing, extending or replacing culverts to prevent further erosion, and to maintain and improve fish passage.

There are two anadromous fish streams on the road from Iliamna to the Newhalen River; Bear Creek, which has a culvert, and N. Fork Alexcy Creek where there is a bridge. Since there will be no in-water work at N. Fork Alexcy Creek, no Title 16 permit will be required for this creek. At Bear Creek, a pair of baffles will be installed in the existing culvert and an outlet apron extended 9.1 meters (30 feet) downstream of the outlet to prevent further erosion and scouring. Per ADF&G recommendations, this project includes plans at S. Fork Alexcy Creek to retrofit an existing perched culvert with baffles and provide rock step pools for resident fish passage. Approximately six other streams along the road corridor were surveyed and/or trapped by ADF&G and ADOT&PF personnel in August 1999. While resident fish were not captured in the area of the roadcrossings, four streams are believed to have resident fish. Therefore, those culverts would be designed to pass resident fish. At Lovers Creek, eight baffles will be installed in the existing culvert and an outlet apron extended 6.1 meters (20 feet) downstream to prevent further erosion and scouring.

In the area of the proposed Newhalen River Bridge, adult sockeye and chinook salmon as well as rainbow trout, grayling, arctic char, and whitefish have been reported. Park Service biologists have observed sockeye salmon spawning near the bank at Fish Camp, but no reports of spawning near the proposed bridge site (personal communication, ADF&G, Wayne Dolezal, December 29, 1999). In 1975 and 1983/84, the ADF&G and USCG respectively, issued permits for the construction of a 550-foot long bridge with a center pier support over the Newhalen River with numerous stipulations including a no in-water work window during the period from July 1 to September 15. However, due to funding problems, that bridge was never constructed and its permit has expired. Since then ADF&G has refined the work timing window for the Bristol Bay area to permit in-water work only during mid-May through mid-July and our ADF&G Title 16 permit for the proposed bridge work has all in-water work occurring during the period between May 15 through July 15. Based on the nature of the impacts expected from the project and the mitigation measures identified above, we have determined that there will be no substantial adverse individual or cumulative effect on EFH in the project area. This project should result in improved resident and anadromous fish stream habitat due to installation of permanent erosion control measures around fish streams, baffles and step pools to improve fish passage, and installation, extension, or replacement of culverts to prevent further erosion, and to maintain and improve fish passage. The new bridge will eliminate the need for heavy equipment and vehicles fording the river, which can impact fish habitat by disturbing the river bank or bottom, causing sedimentation. Installation of the bridge piers will result in minimal short-term impacts during construction, due

to sedimentation and equipment working in-water, however, no long-term or substantial impacts are anticipated.

This project's preferred bridge type is a six span bridge with four piers placed below OHW. Actual area of riverbed occupied by all five piers in the proposed new alternative is less than was previously permitted, down from 19 m² (205 ft²) to 6.8 m² (73 ft²). The bridge has been designed so that the original streambed contours will be retained, and the channel will not be constricted. The riprap will be dug into the substrate so that its final elevation is at the same level as the river bed and will not cause a change in the direction or velocity of the stream flow. Construction of pier placement, and pile driving would be timed to avoid the critical fish window. The Contractor would employ various Best Management Practices to maintain existing water quality and protect aquatic habitat, and abide by all permit conditions.

The No-Build Alternative is likely to result in hunting and fishing pressure increasing at a lesser rate in the area north and west of the Newhalen River, due to restricted overland access (refer to SCIS, page B-60).

R. Historic, Archeological and Cultural Resources

On September 10-11, 1996, the ADNR Office of History and Archeology (OHA) conducted a reconnaissance level cultural resources survey on the 2.74 km (1.7 mile) segment of the proposed road corridor between the existing material source just southwest of Nondalton and the Newhalen River. The SHPO determined that a survey was not necessary for the road corridor portion between the Newhalen River and Iliamna. Based on the investigation results of the survey, the OHA recommended that the ADOT&PF seek the concurrence of the SHPO in a Finding of No Effect. The SHPO provided this notification on October 18, 1996, concluding the responsibilities of the ADOT&PF and the FHWA under Section 106 of the National Historic Preservation Act for this project. ADOT&PF obtained an updated Finding of No Effect from the SHPO on November 28, 2001 (see page A-250). Should cultural resources be discovered during construction, all work which would disturb these resources would be stopped and the SHPO immediately contacted.

The No-Build Alternative would not involve construction and therefore would have no impact on any cultural resources.

S. Hazardous Waste

Within the project corridor, no potential hazardous waste sites were identified. ADEC's contaminated sites database was examined during scoping (4/20/98). The database indicated no known contaminated sites exist along the proposed Iliamna-Nondalton Road. There are several sites within the communities of Iliamna and Nondalton, however, none of these sites are within the project corridor. Nothing indicated the presence of potentially contaminated sites during any of the project field reviews. ADEC's contaminated sites database was checked again in October, 2001. There were still no known contaminated sites reported along the proposed project corridor as of that date. Should contamination be discovered within the state right-of-way a clean-up and disposal plan acceptable to ADEC would be developed.

As part of the construction contract the Contractor would be required to develop a Hazardous Material Control Plan to address containment, cleanup, and disposal of all construction related

discharges of petroleum fuels, oils, and/or other hazardous substances. In addition, the specification requiring the use of material “free from contamination” would be in the construction contract.

T. Visual

The project is in a rural setting located in the gently rolling hills within the Bristol Bay Lowland bordered by the Ahklum Mountains to the northwest and the Aleutian Range to the southwest. Terraces along the river vary from low floodplain to high bluffs. Away from the river, the terrain is generally rolling with the river being visible from a number of locations along the roadway. Area vegetation is a mixture of upland and wetland forest species interspersed with large expanses of tundra species. Since many residents use wood to heat their homes there are few trees over 6.1-9.1 meters (20-30 feet) along the road corridor. Most vegetation averages less than 6.1 meters (20 feet) tall.

Road improvements would not significantly alter existing viewsheds. The view of the roadway to adjacent property owners between Iliamna and the Newhalen River would essentially be the same. Between the Newhalen River and Nondalton additional clearing would be required. The improved embankment would be more visible. However the landscape is already disturbed from the existing road/trail. Road improvements could result in the reduction of numerous trails, thereby reducing the amount of secondary clearing.

From the proposed bridge motorists would be able to look northeast towards Sixmile Lake and Fish Village and southwest, downriver. Some residents of Fish Village and Nondalton, and river users would be able to see the low profile design of the bridge. The linear elements would connect the east bluff edge to the lower river terrace on the west side. The bridge deck would be approximately 7 meters (23 feet) above the river at the river's midpoint.

The No-Build Alternative would preclude any new impacts to the visual environment.

U. Energy

After construction, there may be a slight increase in energy consumption as a slightly higher number of vehicles would use the completed road, but vehicle energy consumption should be less than boat and plane energy consumption.

No additional energy would be required for road utilities, since no street lights or traffic signals would be installed for this project. However, there would be greater energy requirements for road maintenance, since the road is now only minimally maintained.

The fully operational Tazimina Hydroelectric facility, designed to accommodate area growth, has a generating capacity that can be increased from 700 kW to 1,400 kW. Eventually, other communities in the region may be connected to the distribution system. If residences, businesses, or roads are developed in the future, the Hydroelectric facility would likely be able to accommodate additional demand.

Construction of a bridge would allow the existing INNEC underwater power cable to Nondalton to be placed on the bridge so it wouldn't be subject to low river water level disturbance.

Under the No-Build Alternative, energy requirements for road maintenance may remain steady, until increasing deterioration of the road surface leads to failure, at which time greater amounts of fuel for equipment would be required for repairs or reconstruction. In addition, the underwater power cable would remain in place and the problems associated with the cable would continue.

V. Construction

Construction of this project would probably require two construction seasons. It is anticipated that the bridge would be constructed in one or two construction years since no inwater work would be permitted from mid-July to mid-May. Road and bridge construction would impact the following areas:

Air quality would be temporarily diminished during roadway construction activities. Impacts would be minimized by using dust control measures as necessary and maintaining construction equipment in good running condition. Due to the rural location of the proposed improvements, impact to local residents should be minimal.

Noise levels in the area of construction would increase on a short term basis due to the use of heavy equipment. These levels would be temporary and avoid the residential areas and main areas of public assembly.

Water quality of the Newhalen River would be temporarily impacted during bridge construction, and pier placement. The project would be designed to place piers in the river with minimal impact. Best Management Practices would be used to minimize bank and river-bottom disturbance. Detailed bridge plans and specific methods of construction would be developed during the design phase.

The project would have a Department prepared Erosion and Sediment Control Plan from which the Contractor would prepare a Storm Water Pollution Prevention Plan. These plans would detail best management practices that would be used during the construction of the project to maintain water quality standards and include siltation control measures to minimize impacts. Care would be taken to minimize impacts to the river and its bottom. However, it can be expected that during short periods State Water Quality Standards may not be met. A waiver of Water Quality Standards from ADEC may be required for specific activities such as bridge construction, culvert extension, culvert replacement or culvert installation.

Staging areas and storage of fuels would be located in uplands and not be allowed within 30 meters (100') of any wetland or stream/river. Protective fuel transfer measures would be implemented and the Contractor would be required to identify all fuels that would be used and/or stored in the project area, prepare a waste disposal plan and prepare a spill prevention, control and countermeasure plan.

Fish and wildlife impacts would be minimized by scheduling the periods of pier placement, pile driving, and culvert work with ADF&G to avoid periods of fish out-migration, spawning, and rearing. ADOT&PF Best Management Practices (BMP) would be employed to reduce turbidity levels to the lowest extent possible through water quality control measures.

Vehicular traffic on the existing road from Iliamna to the Newhalen River would be temporarily disrupted. One-way lane traffic would maintain access. River traffic and recreational use of the river in the project area could be restricted during bridge construction. A temporary construction navigation plan for river use during construction would be coordinated with and approved by the U.S. Coast Guard as part of the Section 9 permit. USCG staff have stated commercial traffic in the area is limited and is generally by skiff or other small boat. All construction activities would be conducted so that free navigation of the waterway is not unreasonably interfered with during construction. If construction materials such as cables, rebar, large pieces of concrete, or any other materials which may present a hazard to boaters are accidentally dropped in the river, a river closure would be put in effect until the material is removed. Safety would be emphasized during construction.

The No-Build Alternative would preclude impacts from construction but not continuing embankment erosion.

W. Materials and Disposal Site(s)

Material for this project would be Contractor supplied. The Department does not plan to identify or designate any specific material or disposal site(s). Known material sites include the upland material site near Nondalton, the excess material from the bridge site, and sites in Iliamna that could be used by the Contractor. Developed material sites are not plentiful in the area, although those that are developed contain excellent quality material. Unusable material would be used for slope flattening or disposed of at an upland or Contractor permitted site(s).

The No-Build Alternative would preclude impacts from material and disposal sites.

X. The Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity

Local short-term uses of man's environment refers to the use of resources from the road project area. Resources include gravel, concrete, topsoil, construction equipment, labor, and funds. Use of these resources is expected to benefit community productivity directly and on a long-term basis.

With a reliable, safe year-round overland travel route, business activities would be able to deliver goods or services in a more efficient manner between the communities. This, in turn, would maintain or increase the current level of community productivity.

The proposed transportation improvements are based on State and local comprehensive planning, which considers the need for present and future traffic requirements, land use, and development. Local short-term impacts and use of resources for the Preferred Alternative are consistent with the long-term maintenance of the facility and the enhancement of the local area and productivity.

The No-Build Alternative would have a detrimental effect on the short-term uses of man's environment. The existing roadway condition would further deteriorate, causing more problems with erosion, stream sedimentation, and trespass. Long-term productivity would decrease as road conditions worsened with a continued absence of effective and efficient access between the communities.

Y. Irreversible and Irretrievable Commitments of Resources

The Preferred Alternative would involve a commitment of a range of natural, physical, human, and fiscal resources. Developed material sites are not plentiful in the area, although those that are developed contain excellent quality material requiring little processing. Use of gravel for this project is not expected to impact resource utilization on a long-term basis. However, construction of the Preferred Alternative would permanently remove material from availability for the life of the project. Other construction materials commonly associated with construction such as cement, and concrete are also readily available, but would be irretrievably committed. Considerable amounts of fuel and labor would also be required. Although these materials are generally not retrievable, they are not in short supply and their use would not have an adverse effect upon continued availability. Materials currently committed in the existing highway would be utilized where possible in the new facility.

Use of federal resources would require a one-time expenditure of approximately eight million dollars (in 2001 dollars) from the FHWA and the State of Alaska. This would be irretrievably committed for project construction.

The commitment of these resources can be justified by residents, businesses, and tourists benefiting from the improved overall quality of the state transportation system. These benefits would consist of, among other things, improved accessibility, improved traveling safety and reliability for vehicles, overall time savings and reduced cost of transporting goods to Nondalton.

The No-Build Alternative would preclude any commitment of resources, with the exception of maintenance activities, due to lack of construction activities.

Z. Secondary and Cumulative Impacts

The Alaska Department of Transportation and Public Facilities contracted with Community Planning to do a secondary and cumulative impact study of the proposed project. Secondary impacts are defined as effects which are "caused by an action and are later in time or further removed in distance, but are still reasonably foreseeable" (40 CFR 1508.8). Secondary impacts have a connection, or nexus, between the proposed action and the secondary or indirect impact. Cumulative impacts are effects which "result from incremental consequences of an action when added to other past and reasonably foreseeable future actions" (Federal Highway Administration, 1993).

The "Secondary and Cumulative Impacts Study of the Proposed Iliamna-Nondalton Road Reconstruction" is included in Appendix B. The report identifies and describes potential and cumulative secondary impacts, and determines their magnitude. Following is a summary of the report's conclusions.

Environmental

Secondary Impacts - The proposed project would lessen degradation of the existing road and associated environmental impacts from roadway runoff and erosion. Drainage improvements and regular maintenance would lessen erosion and damage to the vegetation along the corridor.

Erosion at culvert crossings and dips in the road would be greatly reduced. The disturbance of the Newhalen River bed from heavy equipment and trucks fording the river should be eliminated.

Cumulative Impacts - The road reconstruction would not result in a meaningful impact to statewide or area fish and game populations. A bridge crossing the Newhalen River would, for some people, impair the perception of a wilderness experience.

Secondary impacts of the no-action alternative would include continued degradation of the roadway, and increased disturbance of the vegetation along the roadway from off-road driving. Erosion would continue to cause siltation to the Newhalen River and its eastern tributaries along the roadway. There would be an increased likelihood of a fuel spill into the Newhalen River due to vehicles crossing the river.

Public Safety and Health

Secondary Impacts - Public safety and health services in Iliamna and Nondalton would, on the whole, be improved. There would be less reliance on air transportation between the communities. The Village Public Safety Officer (VPSO) in each community would be able to share personnel and facilities. Health care is likely to see immediate gains because it would be easier to share facilities, expertise, and equipment and evacuate the critically ill or injured.

Cumulative Impacts - No cumulative impacts were identified.

The no-action alternative is likely to have a negative secondary impact on the study area's public safety and health care systems, both in the near and long term due to the lack of centralization and the continued reliance on air transportation. Cumulative impacts include a lesser tendency to consolidate facilities and services, limiting the opportunity for cost reductions.

Economic

Secondary Impacts - An overall expansion and diversification in the economic structure of the study area is likely to result from this project due to an increase in employment, lowered cost of goods, increased trade and commerce between Iliamna and Nondalton, and increased access to a larger year-round market.

Cumulative Impacts - No cumulative impacts were identified.

Secondary and cumulative impacts of the no-action alternative would have an overall negative effect on the study area's economic structure. This negative impact is likely to increase over time as the differences between single isolated communities (Nondalton) and the rest of Alaska become more pronounced. The differential in the cost of living between Iliamna and Nondalton would escalate.

Government

Secondary Impacts - The Iliamna-Nondalton Road would make it easier to supply government services to the study area through increased and less expensive access between the communities. Government facilities at all levels could be consolidated at one place on the road system rather

than being spread out among several communities (a regional landfill/incinerator and sharing of school district resources are examples).

Cumulative Impacts - Reconstruction of the road is likely to foster a tendency to centralize all types of services and facilities, enabling all the communities to combine resources and develop cooperative facilities. This consolidation should benefit all residents of Alaska by lowering overall costs for services and allowing state funds to be used with better effect.

Secondary impacts of the no-action alternative are likely to have a negative effect on the study area's government services and viability. This negative impact is likely to increase over time in both communities as further cuts in federal spending are passed along to the local area.

Cumulative impacts include a lesser tendency to consolidate facilities and services, limiting the opportunity for cost reductions.

Education

Secondary Impacts - Completion of the Iliamna-Nondalton Road would benefit the school district through an improved ability to transport supplies, materials, students, and personnel between the communities.

Cumulative Impacts - No cumulative impacts were identified.

Secondary impacts of the no-action alternative are likely to result in a reduction in educational quality and access in the study area due to higher costs and difficulty in transportation and sharing facilities.

Transportation

Secondary Impacts - The reconstruction of the Iliamna-Nondalton Road will improve surface transportation in the study area. The potentially dangerous practice of vehicles fording the Newhalen River just south of the proposed bridge site would cease. Repair or shipment of necessary maintenance vehicles would be easier and safer. The road reconstruction is likely to reduce or eliminate driving on the river ice during unsafe periods. (Several people have lost their lives due to accidents associated with driving on the ice between the two communities.)

Existing air taxi operators and air transportation would not be negatively impacted by the road rehabilitation. Air taxis would continue to be contracted for the delivery of mail.

Cumulative Impacts - Since the Iliamna-Nondalton Road is isolated from other surface transportation systems, and will only serve approximately 350 full time residents, reconstruction of this road will have little cumulative effect on statewide or regional transportation.

Secondary impacts of the no-action alternative are likely to have a negative effect on the study area's transportation due to lack of road improvements and the lack of a bridge crossing the Newhalen River. The unsafe practice of crossing the Newhalen River would be continued, disrupting the stream bottom, running the risk of oil spills, and risking lives during winter crossings. Cumulative impacts include a lesser tendency to consolidate facilities and services, limiting the opportunity for cost reductions.

Lands

Secondary Impacts - Overall, road reconstruction is likely to result in less trespass on adjoining private lands, since a properly constructed road would tend to keep vehicles on the road. Improved access between Iliamna and Nondalton resulting from the road reconstruction is likely to result in a minor increase in the pressure to develop private land adjoining the Newhalen River. The reconstruction would also provide increased access to private lands on the west side of the Newhalen River, owned by Kijik Corporation.

Cumulative Impacts - No cumulative impacts were identified.

Secondary impacts under the no-action alternative include an increase in trespass on private lands adjoining the road due to off-road driving. The interest in developing land along the road, especially for non-residents of the area, is likely to remain the same without reconstruction.

Utilities

Secondary Impacts - The road reconstruction is likely to have a positive effect on the provision of utilities in the study area. Bridge construction would allow the INNEC power line to be routed to form a complete loop to Nondalton by adding a power cable to the bridge. This would provide dual service to Nondalton and prevent prolonged power outages from line breaks by ice scour or vehicles breaking the buried segment near Fish Camp. Fuel trucks could deliver petroleum products to Nondalton year-round.

Cumulative Impacts - No cumulative impacts were identified.

Secondary impacts under the no-action alternative include continued interruption of electric power to Nondalton by vehicles breaking the buried power line or by ice scour. Maintenance of the power system in Nondalton would continue to rely on Iliamna based crews, with equipment and supplies arriving by air to repair or restore service. Fuel transport and storage for Nondalton would remain difficult.

Tourism

Secondary Impacts - The reconstruction of the road is likely to have a minor negative effect on the existing high-end tourist industry in the study area. This effect would be offset by gains in the broader tourism market. The project would likely have a positive impact on overall tourism in the area.

The road reconstruction would contribute to the existing pattern of increasing recreational use of the area, but would not result in a significant impact on those resources. Fishing pressure is increasing in the area and ADF&G is taking measures to protect the resource while continuing to provide enjoyable fishing experiences. The road project is likely to enhance potential access to outlying areas north and west of Newhalen with light hunting pressure and substantial populations of big game.

Cumulative Impacts - Road reconstruction is not likely to have any effect on planned tourism development in the study area or region. Existing use patterns at Lake Clark National Park and

Preserve are not likely to be affected by the road reconstruction. Visitation would remain mainly far to the north of the study area.

Secondary and cumulative impacts of the no-action alternative would likely result in a positive effect on the study area's high-end tourism by preserving the aesthetics and perception of wilderness for these visitors. However this segment of the tourism market is relatively stagnant when compared to other sectors which are growing at a much faster rate. The study area will likely lag behind other areas in tourism growth and the ability to service other faster growing sectors without road rehabilitation.

Pebble Copper Mine

Cominco Alaska, Inc., a North American firm based in Canada, has not established specific development plans for its potential copper mine approximately 32.19 km (20 miles) southwest of Nondalton, 28.97 km (18 miles) northwest of Iliamna, between the headwaters of Upper Talarik Creek and the Koktuli River. Cominco has proposed a large open pit mining operation on State lands, employing about 1,000-1,500 workers during construction and about 500 during the operation phase. The future development of the Pebble Copper Mine and haul road would not be addressed until environmental studies are made, permits are issued, and the project becomes economically feasible. The 161 km (100-mile) east-west proposed haul route to a tidewater port currently preferred by Cominco does not follow the north-south alignment of the Iliamna-Nondalton Road alignment. The ADOT&PF is not proposing to build this project to sufficient standards for industrial use. The 85-130 ton capacity trucks planned to transport the mining concentrate to a tidewater port would need an industrial standard road and bridges. A complete new road and bridges would be necessary if the Pebble Copper Mine project proceeds with development. This project will not facilitate any new mining activity because it will not accommodate the industrial size of those vehicles. The construction of this project would have no secondary or cumulative effect on the development of the mine or other proposed or existing resource extraction developments.

DOT&PF contacted Cominco in September, 2001 to find out the latest status of the Pebble Copper Mine Project. In the absence of a major new discovery at the Pebble Copper deposit or a substantial increase in world copper prices it appears that the completion of the 1-2 year feasibility analyses for the Mine will be on hold for the foreseeable future. They do have plans for a drilling program in 2002. Even if they find reserves of high enough grade, they would still have to continue with 2-3 more years of delineation drilling. At that point, they would conduct a 1-2 year feasibility study to determine whether or not to move forward with the project. (Personal communication, Cominco, George Cole, V.P., September 27, 2001)

Sport Fishing and Hunting / Subsistence

The Secondary and Cumulative Impacts Study (SCIS) indicates the proposed project is not expected to induce substantial growth in tourism for any purpose, including sport fishing and hunting. While it is likely that some sport fishing and hunting will increase with better access, most growth is expected to increase with or without this project. Neither ADF&G or other resource protection agencies raised a concern that road improvements and bridge construction would have negative impacts on fish populations or sport fishing opportunities. Since the majority

of the roadway has existed for many years, a significant increased harvest of fish and wildlife as a result of the proposed reconstruction is not expected.

Testimony at the public hearings by those who subsist in the area indicated widespread support for the road and bridge project. Little subsistence hunting or trapping activity by area residents occurs along the existing roadway. Wildlife densities are low along the roadway corridor, according to Nondalton Tribal Council members. The project area is not recognized as an important area for moose calving, rutting, or winter feeding. The closest documented important use area for caribou is west of the project area about 24.14 km (15 miles) around the upper drainage of Upper Talarik Creek and ADF&G has no records of any important trapping areas for fur-bearers in the project area. Little change to this situation is expected with project construction.

ADF&G has stated that the issue of potential secondary and cumulative impacts to fish and wildlife and subsistence use of fish and wildlife resources is adequately addressed in this EA and in the SCIS, and that they have no objection to the project, provided the stipulations in the Title 16 Permit No. FG 01-II-0074 are followed (personal communication, ADF&G, Wayne Dolezal, October 1, 2001).

Alcohol Use

The issue of whether or not the road would cause increased access to and abuse of alcohol was raised during scoping. Various Nondalton residents and agencies, including the State's Department of Health and Social Services agree the road will increase the likelihood of people driving to and from Nondalton, but no one could say for sure whether the purchase of drugs or alcohol would increase as a result of the proposed project. There is no store in Iliamna that sells alcohol, consequently any importation of alcohol would have to be by airplane, which is currently the case in both Iliamna and Nondalton.

After the February/March 2000 public hearings in Iliamna, Nondalton, and Anchorage, ADOT&PF contacted the Alaska State Department of Health and Social Services (DHSS), Division of Alcohol and Drug Abuse, Associate Coordinator, George Kirchner. Mr Kirchner stated that he "does not believe the road would make any difference on drugs or alcohol being brought in to Nondalton" (personal communication, DHSS, George Kirchner, April 18, 2000). The need for the area's communities to address alcohol related issues will continue, with or without a road connection from Iliamna/Newhalen to Nondalton.

Updated Information:

Because the Secondary and Cumulative Impacts Study is over 5 years old, ADOT&PF reviewed project area data and consulted with the Lake and Peninsula Borough manager to determine whether the information in this document is still valid, as of December 2001. There have been no significant changes in the area's demographics, land ownership / land use, government services, education services, public health and safety, transportation facilities, utilities, tourism, fish and wildlife resources, or subsistence use accordingly, there are no material changes since the study was done in 1997 that alter the study's findings. The following facts are intended to provide updated information relevant to the project area.

Demographics:

Data from the 2000 U.S. Census indicate that the demographics have essentially remained the same since this document and the Secondary and Cumulative Impacts Study (SCIS) were written. The SCIS refers to the 1995 U.S. Census population of 99 for Iliamna, with 66% native and the population split almost evenly for males and females. The 2000 U.S. Census reported the population of Iliamna at 102, with 57.8% native, 54 males, and 48 females. The SCIS refers to the 1995 U.S. Census population of 227 in Nondalton, with 89.3% native, 120 males and 107 females. The 2000 U.S. Census reported the population of Nondalton at 221, with 90% native, 121 males, and 100 females.

Public Health and Safety:

The Nilavena Tribal Consortium has received grants from the Denali Commission and the Lake and Peninsula Borough to construct a regional health facility near the Iliamna Airport in 2002. Improved overland access between Iliamna and Nondalton would allow easier access to this facility by Nondalton residents.

Economic:

According to the Lake and Peninsula Borough manager (Walt Wrede), the economy of the project area has become seriously depressed in the last 5 years due to the commercial fishing crisis in the Bristol Bay Area. Current Alaska Department of Community and Economic Development (ADCED) data indicates that fishing in Bristol Bay is an important source of income for Iliamna, Newhalen, and Nondalton residents. Over the past several years, fish returns have decreased significantly, and the price of fish has also dropped dramatically. Economic disasters were declared by the Governor of Alaska in 1997, 1998, and 2001 for the project area. The Department of Commerce also issued Magnuson-Stevens Act Fish Disaster Grants to the three communities in 1997 and 1998.

Tourism:

The Nilavena Tribal Consortium has received a grant from the Economic Development Administration to construct a visitor and cultural center at the Iliamna Airport. This facility is scheduled for construction in 2002.

Fish and Wildlife / Subsistence Use:

ADF&G was contacted to ensure that no new issues regarding fish and wildlife or subsistence use needed to be addressed in the revised EA. They stated that the issues have been adequately addressed in the EA and the SCIS, and that ADF&G does not have any concerns with the project, as long as the stipulations in the Title 16 permit are adhered to (personal communication, ADF&G, Wayne Dolezal, October 1, 2001).

ADOT&PF does not believe that the changes described above affect the conclusions of the Secondary and Cumulative Impacts Study. The SCIS remains a valid document.

V. COMMENTS AND COORDINATION

Notice of this project has been designed to reach as many potentially interested people as possible. The project could affect nearly every permanent resident of the communities of Iliamna, Newhalen, and Nondalton. Outreach to the individuals, businesses, and property owners in this area occurred early in the project planning process. The Department also made an effort to include seasonal users of the area by contacting lodge owners, the Alaska Fish Board, the Alaska Sportfishing Association, and shoppers of several outdoor gear suppliers.

Scoping was performed in accordance with methods routinely employed by the ADOT&PF for federally funded road projects. More information on the scoping techniques and tasks performed can be reviewed in the Scoping Summary Report, referenced in Section VII.

After the Environmental Assessment was approved for distribution and review, a notice of availability of the document and public hearing dates was published in the Anchorage Daily News and The Bristol Bay Times. Three public hearings were held: February 28, 2000 in Iliamna, February 29, 2000 in Nondalton and March 1, 2000 in Anchorage. Comments and responses are found in Appendix D.

A. Agency Scoping

The ADOT&PF conducted the original scoping for this project during 1995. An agency field trip took place to the project site on July 14, 1995. Representatives from four resource agencies and ADOT&PF visited Iliamna and Nondalton, drove the roadway from Iliamna to the Newhalen River and inspected the bridge site from both the north and south approaches.

A scoping package was mailed to 15 agencies on September 28, 1995, with comments requested by October 27, 1995. Newspaper notices of the project description and invitation for comments was published in the Anchorage Daily News on October 25, 1995 and the Bristol Bay Times on October 26, 1995. Comments were requested by November 15, 1995. Responses to this original scoping effort were addressed, analyzed, and appended to the first environmental document; a Categorical Exclusion. This document was approved by the FHWA on January 3, 1996.

For the EA scoping effort, on October 7, 1997, information packages were sent to the seven signatory "merger" agencies (and one non-signatory "merger" agency, USFWS) involved in the "Interagency Working Agreement to Integrate Section 404 and Related Permit Requirements into the National Environmental Policy Act" and approximately 70 non-merger agencies, individuals, businesses, environmental organizations, and tribal groups. Agencies were asked to send comments to ADOT&PF by November 7, 1997. Three scheduled public scoping meetings were announced in the letter, and recipients were encouraged to contact ADOT&PF for more information.

Tables 1 and 2 show the merger agencies responses and other agency responders for this project.

Table 1 - Merger Agency Responses

Agency	Scoping Response	Significant Comments	Purpose & Need Concurrence Response	Alternatives to be Analyzed Concurrence Response	Preferred Alternative Concurrence Response
U.S. Army Corps of Engineers (COE)	Yes	No	Concurrence	Concurrence	Concurrence
National Marine Fisheries Service (NMFS)	Yes	No	Concurrence	Concurrence	Nonparticipation by choice
U.S. Environmental Protection Agency (EPA)	Yes	No	Nonparticipation by constraint	Nonparticipation by constraint	Nonparticipation by constraint
U.S. Fish & Wildlife Service (FWS)	Yes	No	Did not sign form	Did not sign form	Nonparticipation by choice
Alaska Department of Environmental Conservation (ADEC)	Yes	No	Concurrence	Concurrence	Nonparticipation by constraint
Alaska Department of Fish & Game (ADF&G)	Yes	No	Nonparticipation by choice	Concurrence	Nonparticipation by choice
Alaska Department of Natural Resources (ADNR)	Yes	No	Concurrence	Nonparticipation by choice	Concurrence
Lake & Peninsula (L&PB) CRSA	Yes	No	Concurrence	Concurrence	Concurrence

Table 2 - Other Agency/Organization Responses

Agency/Organization	No Response	Comment	Significant
National Park Service, Anchorage	X		
National Park Service, Port Alsworth	X		
Federal Aviation Administration	X		
U.S. Coast Guard	X		
State Historic Preservation Office	X		
Bristol Bay Coastal Resource Service Area	X		
Lake and Peninsula Borough	X		
Bristol Bay Housing Authority	X		
Bristol Bay Health Corporation	X		
City of Newhalen	X		
City of Nondalton	X		
Village of Iliamna	X		
Bristol Bay Native Corporation		Yes	No
Bristol Bay Native Association	X		
Kijik Corporation	X		
Iliamna Natives Limited	X		
Nondalton Tribal Council	X		
INNEC	X		

B. Public Scoping

A public notice of the project description and invitation for comments was published in the Anchorage Daily News on October 13, 20 and 30, 1996 and the Bristol Bay Times on October 16 and 23, 1997. Comments were requested by November 7, 1997. As advertised, three open house public meetings were held in the communities of Iliamna, Nondalton, and Anchorage during the period October 27 to November 4, 1997. Meeting notes of the proceedings of each meeting, recorded by ADOT&PF, are included in Appendix A. Descriptions of ADOT&PF public meeting techniques and information provided can be found in the project's Scoping Summary Report.

1. Iliamna Meeting

The Iliamna meeting was held on Monday, October 27, 1997, at the Iliamna Village Council Building, from 3:00 pm to 7:00 p.m. The sign-in sheet shows 17 people attended that meeting. Issues/comments raised during that meeting are noted in the Scoping Summary Report and summarized at the end of this section.

2. Nondalton Meeting

The Nondalton meeting was held on Tuesday, October 28, 1997, at the Nondalton Community Building, from 2:00 p.m. until 5:00 p.m. Originally scheduled for 2:00 p.m. to 6:00 p.m., an early dismissal was necessary due to malfunctioning runway lights at the Nondalton airport. Approximately 25 individuals attended that meeting. The concerns/comments raised during that meeting are outlined in the Scoping Summary Report and summarized at the end of this section.

3. Anchorage Meeting

The Anchorage meeting was held on Tuesday, November 4, 1997 at the ADOT&PF Aviation Building, 4111 Aviation Drive, Anchorage, from 3:00 p.m. to 7:00 p.m. The sign-in sheet records 19 people attended this meeting. Several people attended who had previously attended the October scoping meetings in Iliamna or Nondalton. Concerns/comments raised at that meeting are listed in the Scoping Summary Report and also summarized at the end of this section.

C. Additional Scoping Activities

In an effort to reach as many interested or affected groups and individuals as possible, ADOT&PF mailed public meeting notices to the City of Nondalton and the Iliamna Village Council to be posted at various locations throughout each community the week before each meeting.

In Anchorage, ADOT&PF posted laminated announcements at sports shops (REI and Gary King's) in an effort to reach sportfishing enthusiasts.

On October 16, 1997, ADOT&PF faxed a meeting announcement to the Fish Board Coordinator's office in Juneau. The Coordinator agreed to distribute the information to Fish Board members prior to the public meetings.

On November 3, 1997, ADOT&PF faxed Radio KNBA information on the upcoming Anchorage public meeting. Radio staff announced the meeting several times prior to the meeting.

D. Summary of Comments

1. Merger Agencies

a. Purpose and Need Concurrence

All seven signatory merger agencies returned completed Concurrence Forms. The USCOE, NMFS, ADEC, ADNR, and the L&PB CRSA concurred with the Purpose and Need Statement. The ADF&G responded with “nonparticipation by choice”, indicating that issues can be resolved at the next stage of project development. The ADF&G had no objections to the project, stating that conditions would likely protect and improve conditions related to water. The USEPA responded with “nonparticipation by constraint”, indicating that the agency does not have the ability to participate in the process at this point due to workload.

The USFWS was also sent a merger agency scoping package. In a telephone record, the USFWS stated they had no concerns or comments and had no objections with the ADOT&PF proceeding with the project. However, since they were not a signatory agency, they did not return the Concurrence Form.

Scoping responses were sent in by the USCOE, NMFS, ADNR, ADEC, ADGC, and ADF&G and are summarized below. Copies of the responses and agency Concurrence Forms are found in Appendix A.

b. Summary of Issues Raised

U.S. Army Corps of Engineers: sent flood hazard data and determined that a permit pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act would be required. The specific type of permit will be determined after the submittal of our application.

National Marine Fisheries Service: reviewed the comments from the ADF&G and support their recommendations. In addition NMFS requested copies of the Scoping Summary Report be provided to the resource agencies prior to requesting concurrence with the Purpose and Need Statement.

U.S. Environmental Protection Agency: stated that due to resource constraints, they were unable to offer any scoping comments and faxed a Concurrence Form checked, “Nonparticipation by Constraint”.

Alaska Department of Environmental Conservation: stated the comments they provided in the original 1995 scoping process remain valid. In summary, ADEC stated 1) they may require a plan review for storm water collection and treatment, 2) erosion problems need to be addressed during and after construction, and 3) they supported the ADF&G on the requirement for stream bank protection. Concerned about water quality, the ADEC questioned if bridge installation would cause hydrology changes; relocation of the river or changes in the active erosion areas of the river.

Alaska Department of Fish & Game: stated the scoping comments they provided on November 6, 1995 should be considered and provided additional comments on erosion of the road prism, slope of the road approach to the bridge, and road maintenance. They recommended that the road prism be stabilized at stream crossings, bridge approaches be constructed to prevent sediment

transport to the Newhalen River, and road maintenance techniques avoid placement of gravel berms adjacent to the road.

They stated if construction needs to occur below the ordinary high water level of the Newhalen River then a Title 16 Permit from ADF&G would be required. That permit undoubtedly would have conditions relating to specified work windows and construction techniques. For work in other fish bearing streams Fish Habitat Permits would be required. They also requested that we consider the secondary impacts, including stream sedimentation, increased hunting and fishing pressure adjacent to the road, and increased vehicular collisions with wildlife. (Note: A Secondary and Cumulative Impacts Study was completed January 1997 and included in Appendix B of this EA.)

Alaska Department of Natural Resources: Division of Mining and Water Management advised that care should be taken not to de-water nearby wetlands during road construction. They are concerned with adverse impacts downstream due to the lack of a bridge, forcing the fording of heavy equipment across the river. They note construction of a bridge would reduce sedimentation and erosion problems at the river crossing. Also, road construction would reduce wetland impacts in comparison to the current situation where vehicles continually increase the footprint to avoid soft areas. They stated that provided design and construction are done using appropriate engineering practices, the project would likely not only protect, but improve conditions with regard to water.

The scoping package was forwarded to the Division of Land, which had no comments, and the Division of Parks and Outdoor Recreation, which stated there are no existing or proposed state parks in the project vicinity.

Alaska Division of Governmental Coordination: stated they would keep the information on file until receipt of an Alaska Coastal Management Program application.

Lake and Peninsula Borough: had no comments.

c. Alternatives to be Analyzed Concurrence

All seven signatory merger agencies returned completed Concurrence Forms regarding the range of alternatives to be discussed in this EA.

U.S. Environmental Protection Agency: checked “Nonparticipation by Constraint” due to staff loads.

U.S. Corps of Engineers: concurred without further comments.

National Marine Fisheries Service: concurred without further comments.

Alaska Department of Environmental Conservation: concurred and included a printout from the Contaminated Sites Database.

Alaska Department of Fish & Game: concurred with the range of alternatives and had the following recommendations. They would like to have both abutments constructed as far back

from the banks as possible and a vegetated buffer maintained, stormwater directed easterly away from the east bank, and the bridge built to accommodate large maintenance equipment. They would also like to see the road right-of-way maintained to allow public access along the east and west river banks.

Alaska Department of Natural Resources: chose "Nonparticipation by Choice". Nonparticipation by choice means that based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

Lake and Peninsula Borough: concurred without further comments.

d. Preferred Alternative Concurrence

All seven signatory merger agencies and USFWS returned completed Concurrence Forms regarding the preferred alternative that is discussed in this EA.

U.S. Environmental Protection Agency: checked "Nonparticipation by Constraint" as they did on the previous concurrence point.

U.S. Corps of Engineers: "concurred" with the preferred alternative with no comments.

National Marine Fisheries Service: elected the "Nonparticipation by choice" and commented that they would like ADOT&PF to assess need and design an access point/boat launch for recreational users at the bridge, ensure culverts provide adequate flow for fish passage, and follow ADF&G work windows.

Fish and Wildlife Service: checked "Nonparticipation by Choice" on their form and reiterated ADF&G's comment on culvert concerns and the need for public access to the Newhalen River. In addition they would like to see the east abutment of the Newhalen River bridge moved back away from the river so that no riprap would need to be deposited below the ordinary high water line.

Alaska Department of Environmental Conservation: selected "Nonparticipation by constraint" at this concurrence point.

Alaska Department of Fish & Game: selected "Nonparticipation by choice" and had the following comments on the preliminary draft environmental assessment. With a few exceptions they felt the PDEA adequately addressed fish and wildlife related concerns. They recommend we use the information they collected in August 1999 on culverts and fish passage, mention the badly eroded road embankments, discuss measures to prevent road runoff from entering the Newhalen River, and design access to the Newhalen River on the Nondalton side to prevent long term erosion and water quality problems. Over the last few years the work timing window for the Bristol Bay area has been refined; inwater work is usually permitted only during the period mid-May through mid-July.

Alaska Department of Natural Resources: checked "concurrence". They mentioned that since the Newhalen River is navigable and its bed state owned a right-of-way from DNR may be required for the bridge.

Lake and Peninsula Borough: concurred with the preferred alternative. They did submit comments on the preliminary draft environmental assessment and requested we again look at means to transport bridge materials to the site, especially perhaps longer pieces. The Borough Planning Commission and Assembly would prefer as few piers as possible in the Newhalen River. Later in the same letter they state that since the Borough Assembly meeting they became aware of new information including the fact that ADOT&PF is working with ADF&G and it now is clearer that the preferred alternatives design may have significant advantages over other designs. (Note: After receiving this letter we consulted with our bridge designers and they confirmed that the six span bridge is still the best design.)

2. Other Agencies and the Public

a. Summary of Issues Raised

The issues and concerns raised during scoping are summarized below.

Land Use

- Project completion may have some negative impacts on the land; people want to save the land from degradation.
- More trespassing may occur, so native corporations would need to police their lands.
- Concern with the bridge and road encouraging more trespass problems, especially on berry patches.
- Concern about the impact on increased levels of land use in the area.
- The EA should discuss the proposed Pebble Beach mine.

Education

- The project would initiate more interaction between students and teachers.
- The project would allow more shared resources and activities between community schools.

Social

- The project would contribute to the health of the area's communities.
- Concern the project would increase importation of drugs and alcohol into Nondalton.
- Concern that it could be a public policy tragedy for ADOT&PF to deny local residents this valuable transportation improvement.
- Opportunity for local hire.
- Concern about the cost of constructing this project.
- How is this project economically justified? Is there a calculated cost-benefit ratio?
- Concern whether the entire project can be built with the funding requested. If it can't, which parts will be deleted or deferred?
- What is the cost per Nondalton vehicle of this proposal? What is the cost per person, per household, of this proposal?
- Concern that without this project, employment opportunities would be even more limited than what they are now.
- Make sure the EA accurately represents the full costs of the project.

- What is the economic value, in terms of expenditure value and net willingness to pay, of rainbow trout and salmon in area streams in relation to crowding, target species and amenities, under different levels of use?
- What is the economic value, in terms of passive use value, of the river?

Air Quality

- Some folks think the road will create more dust and already the berries are dusted.

Wetlands

- The project will require a Section 404/10 permit for discharge of dredged and/or fill material into waters of the United States.
- Care should be taken not to allow dewatering of wetlands by the road construction.

Fish & Wildlife

- Concern about the impacts on the “Wild Trout Management Plan”.
- Placement of bridge piers, placement of new culverts, culvert extensions or culvert replacements will require a Fish Habitat Permit from ADF&G.
- The negative impacts of the project on the existing high-quality commercial fishing and sport-fishing resources of the Newhalen River need to be addressed.
- ADOT&PF needs to address the concern of increased pressure on local fish and game stocks.
- What is the impact on rainbow trout age and size distribution in the population of trout that migrate within the Kvichak drainage?

Subsistence

- Some folks think this project will negatively affect availability of berry resources.

Aesthetics

- The bridge will negatively impact the scenic views of the Nondalton area.
- The safety and basic quality of life of so many residents should not be sacrificed for the bridge aesthetics issue.
- Bridges are aesthetically pleasing.

Parks

- Does Section 4(f) apply to this project?

Utilities

- The Iliamna, Newhalen, Nondalton Electric Cooperative (INNEC) power cable should be placed across the bridge.
- Concern about major investments that were made in the summer of 1997 in constructing the Tazimina Hydroelectric Plant and the spur road which connects to the Iliamna-Nondalton Road.

Traffic

- Concern that traffic will increase with project completion.

Access

- Allotment owners may risk having others trespass more easily on their property.
- There are landings now available to gain access to the river and connected water bodies; there is a question whether this project will increase sport fish use of the area.

Safety

- There are many bad spots in the road now.
- There is a concern with a one-lane bridge.

Rights-of-Way

- Liability issues should be explored. Who is liable if someone gets hurt within the ADOT&PF right-of-way before the project is completed?
- Question of who owns the right-of-way along the corridor and under what legal interpretation?
- Concern about the power easement deadline. What happens if the road is not built?
- Does the state own a valid, existing right-of-way for the road over the entire distance from Iliamna to Nondalton?

Maintenance

- Concern that this project will not solve the many maintenance problems existing along the road.
- Concern about the costs of maintenance. What are they?
- A question whether the state has ever constructed, improved or maintained a public road from Alexcy Creek north to the road segment that links a material site to Nondalton?
- The EA needs to accurately represent the history of maintenance.

Alternatives

- What are all of the reasonable alternatives to the project?

Design & Construction Considerations

- Silty materials add to asthma problems of residents. Add more gravel to the surfacing materials.
- Consider two lanes for the bridge design.
- Consider adding a lockable gate at the bridge site.
- ADF&G recommends that the bridge abutments and armor rock on the bridge abutments be placed completely above OHW. ADF&G is concerned with pile driving and placement of bridge piers noting that this work may require isolation of the work area from flowing waters of the Newhalen River.
- In the EA, discuss the role of the development of the Cominco mine on the location and design of the project.
- Concern that federal design approval and funding is available for the construction of a one-lane bridge and a rural minor collector road.
- Question whether this project involves any “reconstruction”. ADOT&PF needs to accurately describe the quality, quantity and character of the work to be performed.
- The EA should accurately represent the legal classifications of the road.

Secondary and Cumulative Impacts

- ADOT&PF needs to consider sedimentation of the stream from roadway erosion, increased hunting and fishing pressure on the lands and streams adjacent to the road, and increased vehicular collisions with wildlife.
- Secondary impacts from road improvements may be much more significant than the direct impacts from road construction.

- Are there any impacts to the brown bear, Newhalen River sport fishery, and the purposes and character of Lake Clark National Park?
- Concern that the time and expertise invested in evaluating the potential impacts and the conclusions which resulted based on the Secondary and Cumulative Impacts Study have been largely ignored.

b. New Alternatives Suggested

During and as a result of the scoping process additional alternatives were evaluated. They include a ferry alternative, a tram alternative, constructing just the bridge, or improving just the existing roadway. These alternatives are addressed in this Environmental Assessment.

c. Special Studies Suggested

During the scoping period, suggestions were made regarding the need to do additional studies; a cost-benefit analysis and a secondary and cumulative impact analysis. A secondary and cumulative impact study was completed January 1997. A cost-benefit analysis is not required as the ADOT&PF Planning Section considers cost in the STIP process. As public entities, FHWA and ADOT&PF have a duty to protect public resources and provide for fiscally sound and efficient transportation projects, however a cost-benefit analysis is not required by NEPA or other Federal or state laws. In addition, cost-benefit analyses are not used by ADOT&PF to score Remote Roads and Trails transportation improvement projects. Project cost is not one of the standard thirteen criteria that are routinely scored by the ADOT&PF Project Evaluation Board (PEB) in the evaluation of proposed remote Alaskan road transportation improvement projects such as the Iliamna-Nondalton Road Improvement Project. Economic development is not the primary purpose for this project; the intent of the project is to provide year-round overland access between Iliamna and Nondalton allowing the communities mobility, increased safety, and use of regional service facilities.

E. Environmental Assessment Comments

1. Summary of Agency Comments

The Environmental Assessment was mailed to merger agencies, other state, federal and local agencies, and some public members on January 25, 2000 for review and comment. The following agencies provided comments (see Appendix D):

National Marine Fisheries Service - stated that they had reviewed the EA and had no comments. The information provided "is adequate for a non-objection to EFH given the in-water work window."

Alaska Department of Fish & Game - provided comments on the EA and ADGC Consistency Review. They stated "with a few exceptions the EA adequately addresses fish and wildlife related concerns", however they needed additional details for several elements of the project before they could issue a Habitat Permit. Those details were provided through numerous meetings and exchanges, and resulted in the issuance of the Habitat Permit on March 2, 2001.

Lake and Peninsula Borough - enthusiastically supports this project and believes the EA does "an excellent job of describing the nature and scope of the project and appreciates the frequent consultation". Borough staff attended all three public hearings and "witnessed the overwhelming display of public support that was once again displayed for this project." They stated that the "do nothing option" is unacceptable from an environmental and community development perspective.

They provided specific comments and information to strengthen and improve the purpose and need statement for the project, however, since the merger agencies have had the opportunity to comment and concur on the purpose and need statement in the EA the decision was made not to incorporate the additional information in the Revised EA Purpose and Need section but has been included in Appendix D. L&PB stated there should be no public access or boat launch at the proposed bridge site and stated that there are better locations for a boat launch within the City of Nondalton. After numerous communications with the resource agencies and public officials, ADOT&PF has decided not to build a boat launch adjacent to the proposed bridge if the City of Nondalton and the Alaska Department of Fish and Game can develop an alternative site on Sixmile Lake within the City of Nondalton boundaries. If that public boat launch is not developed prior to the construction of this project, ADOT&PF will build Option #3. However if Option #3 is not constructed, Option #2 will be built to ensure the riverbank and vegetation near the bridge are not trampled and damaged, and to maintain water quality in the Newhalen River. Whichever option is constructed Private Property - No Trespassing or similar signs will be installed to discourage trespass on to adjacent private property.

Iliamna Village Council - wrote a letter stating the Council is in full support of the road and would "like the State of Alaska to work closely with the communities in getting the road contract and hiring local people for the road project."

City of Nondalton/Office of the Mayor - The Nondalton City Council, by unanimous vote "endorse and demand the final completion of the project." They believe the EA does not identify any significant social or environmental impact. However, the Council opposes the boat launch and any other activity in the vicinity of the bridge. They do not think anyone from Nondalton, Iliamna or Nondalton will utilize the site due to the distance from each village. Second, they state the site has some swift currents and unpredictable river bottom and they are working with ADF&G on a better launch site. As stated above, if ADF&G and the City of Nondalton develop a public boat launch prior to this project, DOT will only build Option #2 and sign the area to discourage trespass outside of the state right-of-way.

2. Summary of Public Comments

Public comments on the EA came in the form of testimony during the three public hearings or written comments. A summary of the comments is presented below, and a copy of the hearing transcript and actual written comments provided in Appendix D.

There is unanimous local and general public support for the project. The majority of community residents support the project and would like to see the project constructed as soon as possible. A few individuals however do not support the construction of a boat launch at the proposed bridge site. They would prefer a site be developed within the boundaries of the City of Nondalton.

Reasons vary from concern over trespass on to adjacent private property, to concern over the siting of a launch at that location of the river, to concern that the launch would be too far from Nondalton and Newhalen/Iliamna.

A few individuals do not support the Preferred Alternative. One commenter wrote opposing the project and his letter addresses: increased access and consumption of drugs and alcohol, increased non-resident resource use, desire for local hire, maintenance concerns, caribou migration effects, how this might influence future roads, increased trespass, and bridge height. Another individual wrote questioning the purpose and need for the project, has a concern about an absence of a long-range planning process and not integrating the NEPA process, inadequate Alternatives Section, and the desire for an Environmental Impact Statement. Those letters and DOT&PF responses are in Appendix D.

VI. LIST OF PREPARERS

Name/Education	Expertise Applied to this EA	Profession/Experience
James A. Bryson	FHWA Guidance and Project Review	Realty/Environmental Officer 12.5 years FHWA Environmental
Tim A. Haugh B.S. Wildlife Science	FHWA Guidance and Project Review	Environmental/Right-of-Way Specialist 9 years FHWA Environmental
Steven R. Horn, P.E. B.S. Civil Engineering	Project Development, Management and Supervision	Preliminary Design & Environmental Supervisor 24.5 years ADOT&PF design
Jerry O. Ruehle B.S. Wildlife Mgt	Document Supervision	Preliminary Design & Environmental Coordinator 20 years ADOT&PF Environmental; 2 years USFWS; 1 year ADF&G
John Dickenson, P.E.	Project Supervision and Document Review	Project Manager 30.5 years ADOT&PF Highway and Preliminary Design
Susan N. Wick B.S. Environmental Studies	Document Review and Preparation Supervision	Environmental Team Leader 15.5 years ADOT&PF Environmental; 5 years ADF&G Fisheries Biologist
Carol J. Sanner B.S. Wildlife/Fisheries M.S. Fisheries	Regulatory Permitting	Environmental Permits Officer 13.5 years ADOT&PF Environmental; 22.5 years wildlife and fisheries research, management, teaching
Helen P. Lons B.S. Wildlife Biology/ Natural Resources Management	Environmental Research and Primary Author	Environmental Analyst 2 years ADOT&PF Environmental; 4 years ADMVA Environmental; 1 year ADNRR Natural Resources Mgmt; 3 years private sector; 3 years USFWS
Kristen J. Hansen M.S. Environmental Science	Environmental Research and Co- Author	Environmental Analyst 2.5 years ADOT&PF Environmental; 1.5 years private sector (environmental)
Lavonne Rhyneer A.A. Liberal Arts B.S. Natural Science	EA Design Preparation and Figure Layout	Drafting Technician 14.5 years ADOT&PF Environmental; 1.5 years ADF&G drafting; 1 year engineering drafting
Gordon Lewis B.S. Biology/Scientific Land Management M.S. Land Resources	Secondary and Cumulative Impacts Study Author	Planning and Land Use Consultant 16 years Alaskan experience

VII. BIBLIOGRAPHY

Ackley, U. of AK. *An Economic Evaluation of Recreational Fishing in Bristol Bay, Alaska*.

Alaska Department of Fish & Game, Division of Sport Fish, *Management of Sport Fisheries in Southcentral Alaska: An Overview of Fisheries, Issues, Objectives, Program Expenditures, and Benefits Through 1996*. January 21, 1997.

Alaska Department of Fish & Game, Division of Habitat, *Alaska Habitat Management Guide, Southwest Region, Volume II: Human Use of Fish and Wildlife*, 1985.

Alaska Department of Natural Resources, Division of Parks and Outdoor Recreation, Office of History and Archeology, *Archaeological Investigation of the Proposed Iliamna-Nondalton Road Corridor: Nondalton to Newhalen River (Project No. 51951), OHA Archeological Survey Unit Short Report 96-4*. November, 1996.

Alaska Department of Transportation and Public Facilities, Iliamna-Nondalton Road Improvements, *Scoping Summary Report*, December, 1997.

_____, Statewide Transportation Improvement Program (STIP) FY 1996-1998, Amendment #4, February 1997.

_____, Draft Statewide Transportation Improvement Program (STIP) FY 1998-2000, November, 1997.

_____. Nondalton Airport Improvements Environmental Assessment, Project No. 58617. July, 1992.

_____, Central Region, Division of Planning. *Nondalton-Newhalen/Iliamna Pioneer Road Feasibility Study*. March, 1986.

Alaska Office of the Governor, Division of Governmental Coordination, *Regulation of Cumulative and Secondary Impacts in Alaska*, July, 1993.

Anchorage Daily News, *"Feds focus on cutting Alaska aviation deaths"*, December 15, 1999.

Bristol Bay Area Plan for Statelands, Alaska Department of Natural Resources, September, 1994.

Community Planning, *Secondary and Cumulative Impacts Study of the Proposed Iliamna-Nondalton Road Reconstruction*. January, 1996.

Council on Environmental Quality, *Considering Cumulative Effects Under the National Environmental Policy Act*. January, 1997.

Deaux, Edward, Ph.D. and Tom Nighswander, M.D., *Nilavena Tribes Health Center Study*, August 21, 2000.

Federal Highway Administration, Excerpts from *A Guide to Federal-Aid Programs, Projects, and Other Uses of Highway Funds*, Publication No. FHWA-PD-92-018, Federal Highway Administration (September 1992).

Federal Highway Administration. Secondary and Cumulative Impact Assessment, Federal Highway Administration, Project Development Branch, 1993.

FHWA and Alaska Department of Highways, Central District. *Newhalen to Nondalton, Bristol Bay Borough, Alaska, Project S-0214(1), Supplement To The Negative Declaration of March 23, 1972*. November 13, 1975.

Iliamna-Nondalton Inter-Tie Phase 1 Progress Report, Volume II. Project Name: Nondalton/Newhalen Road Construction, Project Number: F1094. 1983.

Issacs, Jon & Associates, *Commercial Recreation Service Providers Study* for the Bristol Bay

Jones & Stokes, *Southcentral Alaska Sport Fishing Economic Study* for ADF&G, 1987.

Lake and Peninsula Borough, *Lake and Peninsula Borough Comprehensive Plan*, 1993.

Lake and Peninsula Borough and Dept. of Community and Regional Affairs. *Lake and Peninsula Borough Coastal Management Plan, State Approved Draft*, March 1996.

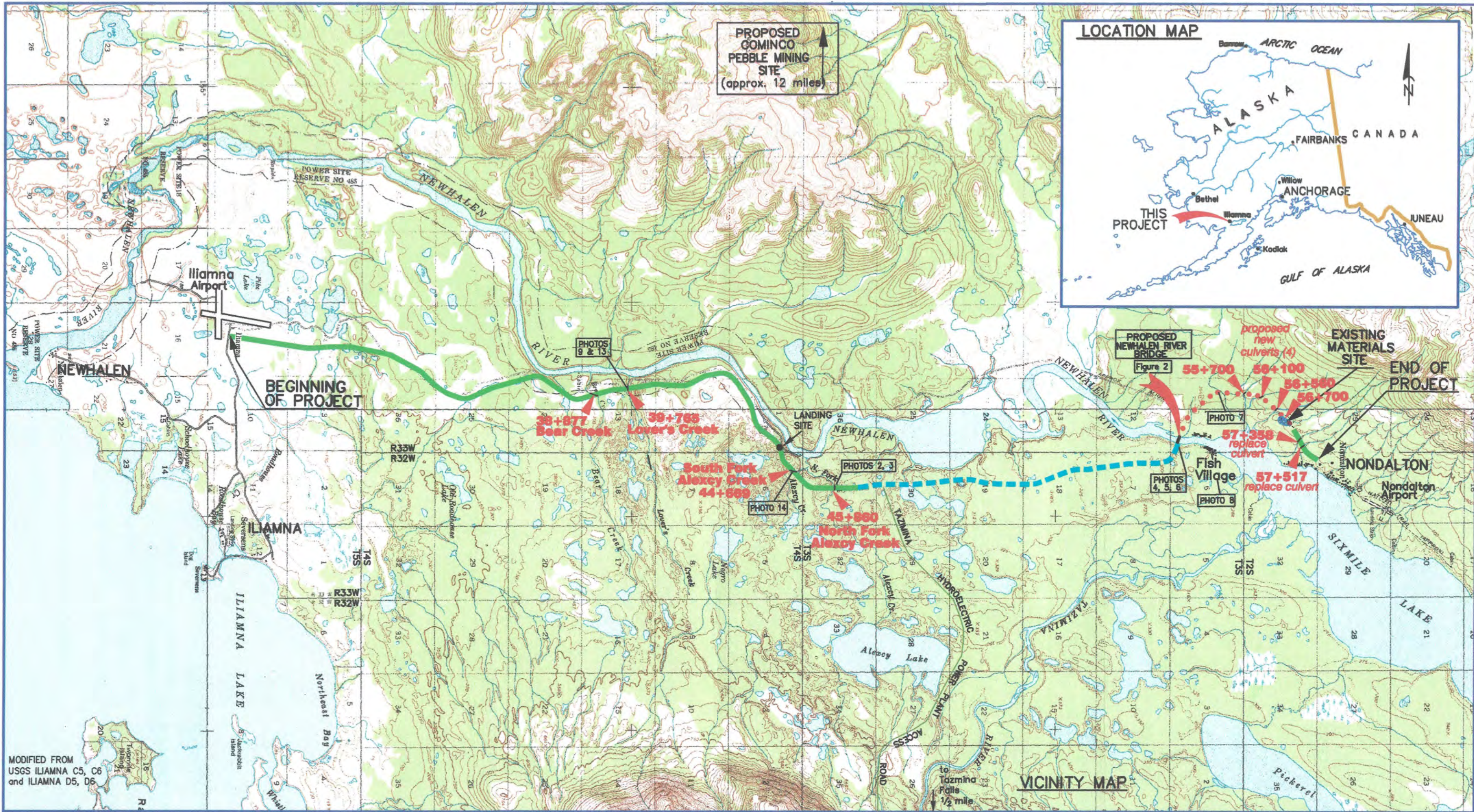
Memorandum, dated April 22, 1992, from Thomas O. Willett, Office of Engineering, FHWA, Washington, D.C. to Jerald Clark, FHWA, Portland, Oregon. Subject: Availability of Funds in Alaska/23 U.S.C. 118(f).

Mills, ADF&G, *Harvest, Catch and Participation in Alaska Sport Fisheries*, 1987-95.

A Summary -- Intermodal Surface Transportation Efficiency Act of 1991 -- Alaska Edition, U.S. Department of Transportation, (1992).

U. S. Army Engineer District, Alaska. 1995. *Finding of No Significant Impact and Environmental Assessment, Williamsport Navigation Improvements, Williamsport, Alaska*.

FIGURES



MODIFIED FROM
USGS ILIAMNA C5, C6
and ILIAMNA D5, D6



DIVISION OF
STATEWIDE DESIGN AND ENGINEERING SERVICES
PRELIMINARY DESIGN
AND
ENVIRONMENTAL SECTION



0 1
Scale in Miles

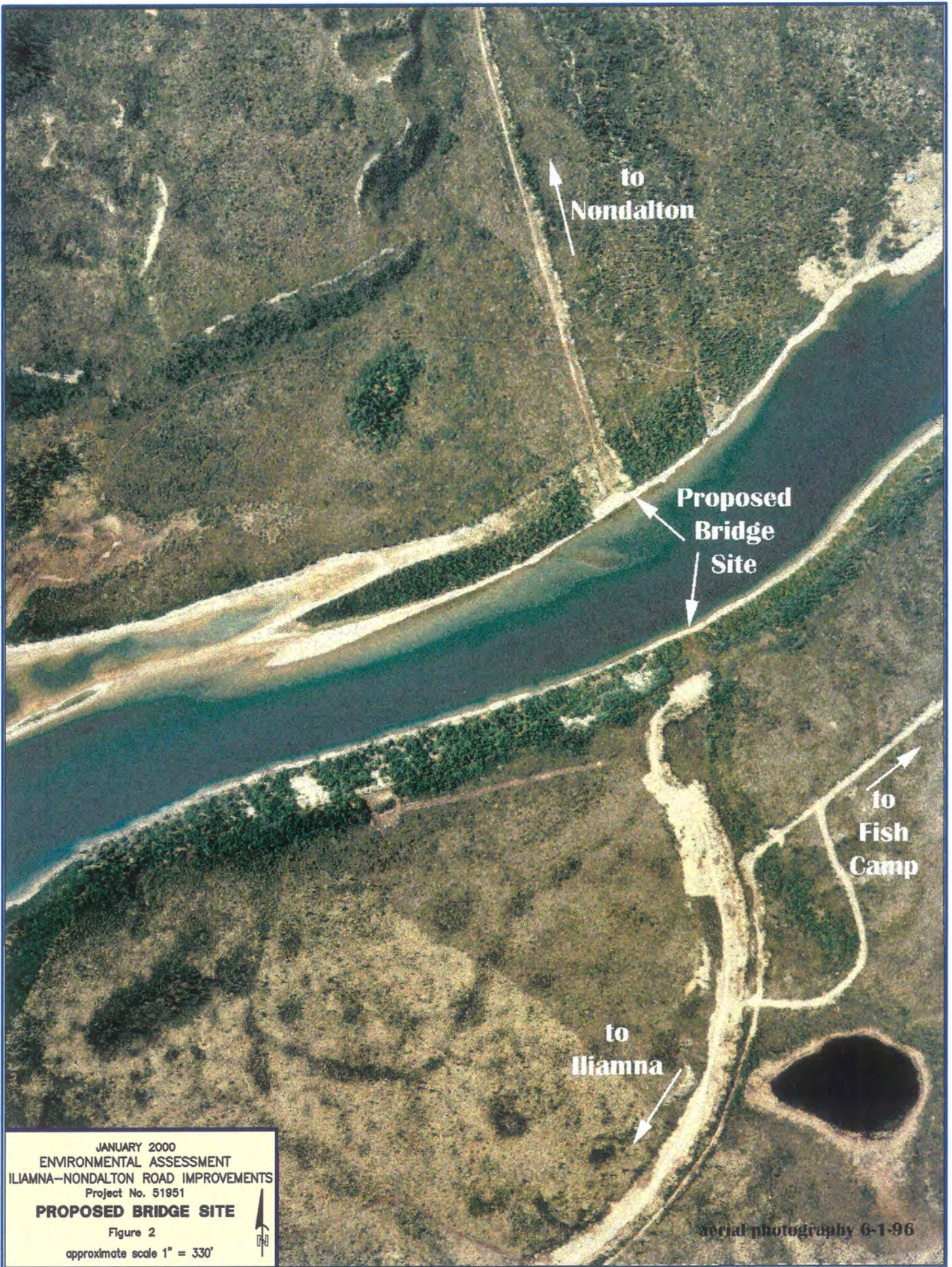
LEGEND

- EXISTING ROAD (resurface only)
- - - - EXISTING ROAD (to be improved and resurfaced)
- EXISTING PIONEER ROAD/ATV TRAIL (construct to roadway standards)

ENVIRONMENTAL ASSESSMENT
ILIAMNA-NONDALTON ROAD IMPROVEMENTS
Project No. 51951
LOCATION and VICINITY MAPS

Figure 1

newtry2.tif , dotlead_copy.tif



to
Nondalton

Proposed
Bridge
Site

to
Fish
Camp

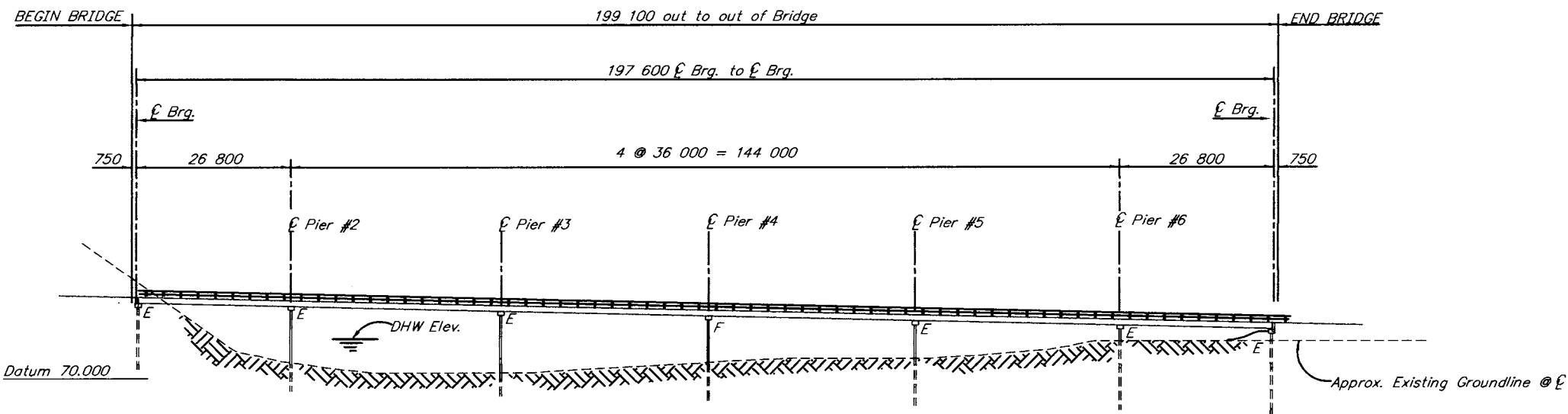
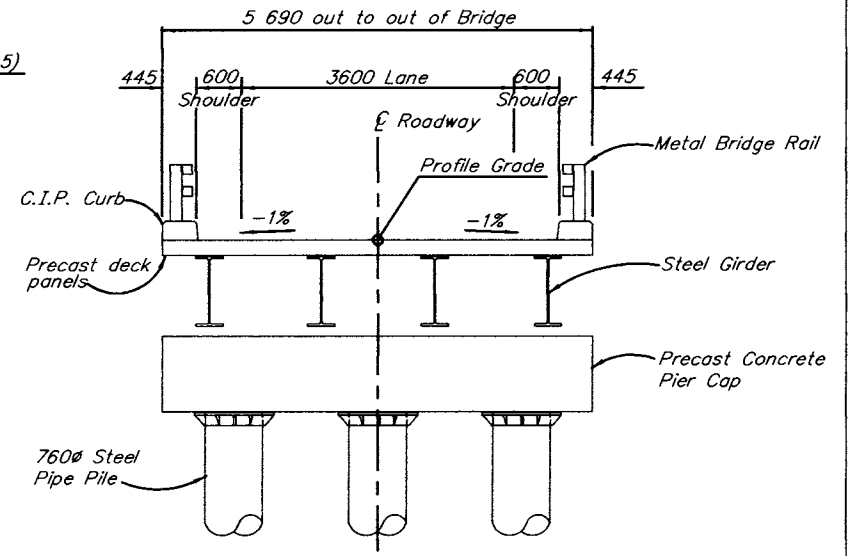
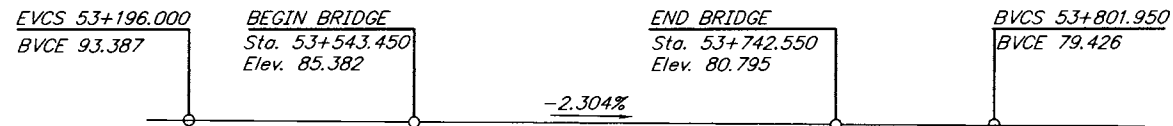
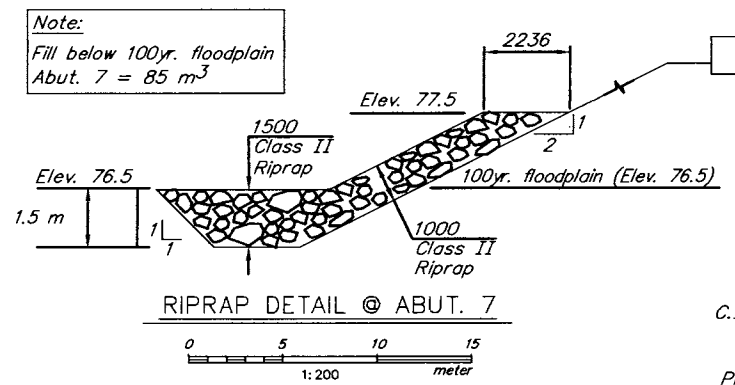
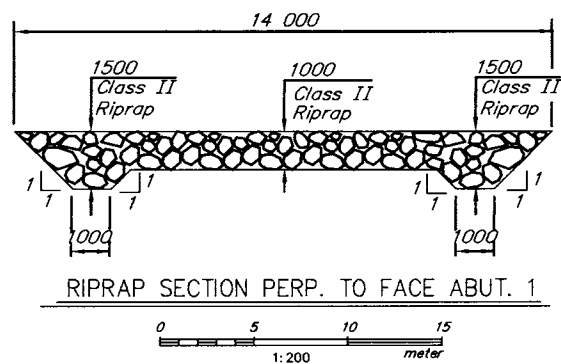
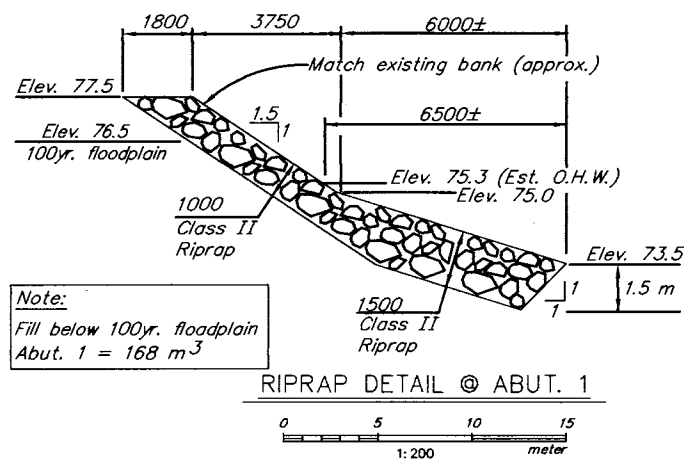
to
Iliamna

aerial photography 6-1-96

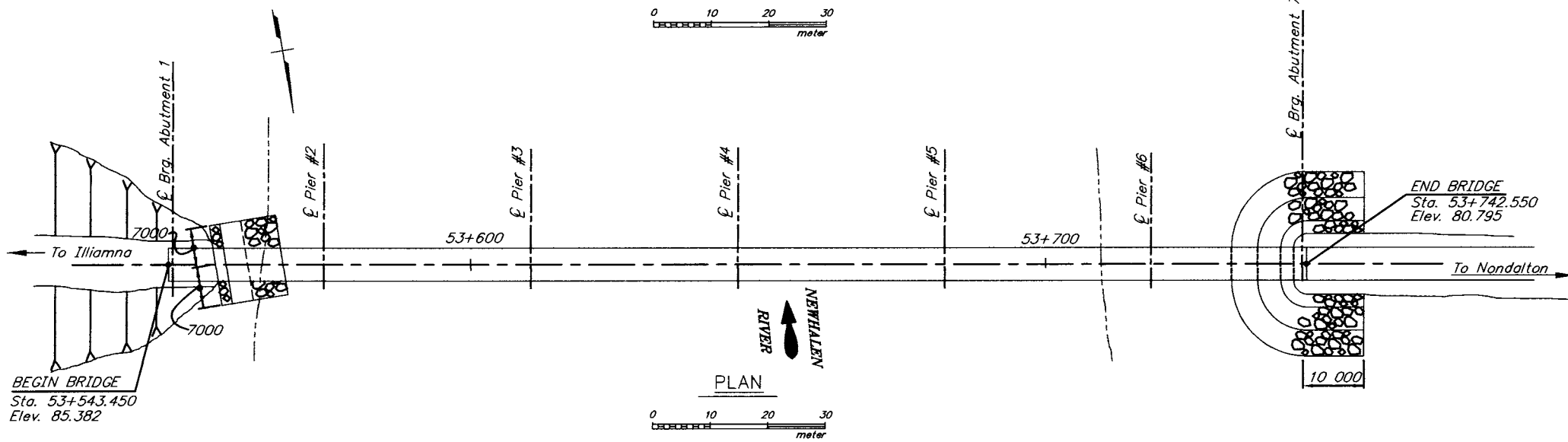
JANUARY 2000
ENVIRONMENTAL ASSESSMENT
ILIAMNA-NONDALTON ROAD IMPROVEMENTS
Project No. 51951
PROPOSED BRIDGE SITE
Figure 2
approximate scale 1" = 330'



both.tif



DRAWING INDEX	
TITLE	DWG. NO.
General Layout	1
Site Plan	2
Abutments	3
Piers	4
Bearing & Exp.	5
Typical Section	6
Precast Deck Panels	7
Framing Plan	8
Girder Detail 1	9
Girder Detail 2	10
Girder Splice	11
Camber Detail	12
Metal Bridge Rail	13
Test Hole Logs	14-16



PRELIMINARY
FOR DESIGN STUDY

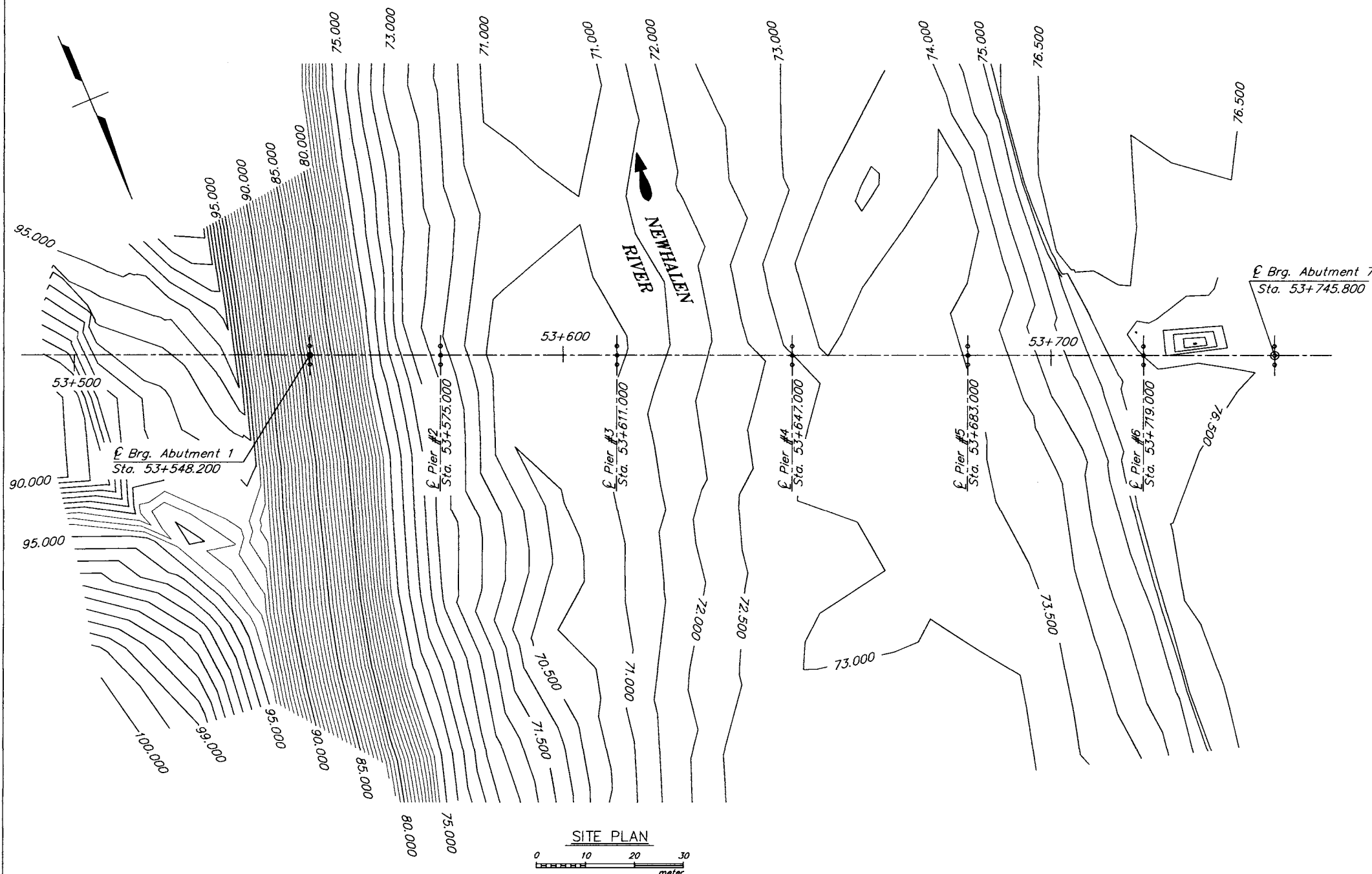
NEWHALEN RIVER BRIDGE
ROUTE S-214
GENERAL LAYOUT

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
and PUBLIC FACILITIES
JUNEAU, ALASKA



BRIDGE NO. 1286
FIGURE 3

Designed By: EEM
Detail Check By:
Design Check By:
P: 1/2005 1286-1.dwg
3/25/2006 12:37
Plot Scale = 12.70
Revised By: CSA



GENERAL NOTES

SPECIFICATION:

Design:..... AASHTO LRFD Bridge Design Specification, 1994 Edition, with the latest Interim Specifications.

Construction:..... State of Alaska Interim Standard Specifications for Highway Construction, (Metric) 94M with Special Provisions.

Live Load:..... HL93

Dead Load:..... 1.1 kPa for future paving.

MATERIAL PROPERTIES:

Structural Steel:..... $F_y = 345 \text{ MPa}$

Cast-in-Place Concrete:..... $f'_c = 21 \text{ MPa}$

Precast Concrete:..... $f'_c = 41 \text{ MPa}$

Reinforcing Steel:..... $F_y = 414 \text{ MPa}$

STRUCTURAL MATERIALS:

Concrete:..... All cast in place concrete shall be Class "A".

Reinforcing Steel:..... All reinforcing steel shall be standard U.S. sizes and shall conform to ASTM A615M Grade 400.

Structural Steel:..... All structural steel for Girders, Splice plates & Brg. stiffeners shall be ASTM A572M GR345. All other structural steel shall be ASTM A36 unless otherwise noted.

All Piles shall be 760x19 thick, ASTM A572M, Grade 345.

All high strength bolts shall be ASTM A325

PILE SPECIFICATIONS:

Piling:..... Design pile load = 645 kn
Ultimate bearing capacity = 1780 kn

HYDRAULIC & HYDROLOGIC SUMMARY			
	50 Yr.	100 Yr.	500 Yr.
Flood frequency (Yr.)	50	100	500
Exceedance Probability (%)	2	1	0.2
Design discharge (cms)	1169	1266	1481
Design Highwayter (m)	76.3	76.5	76.8
Anticipated additional backwater (m)	<0.1	<0.1	-
Contraction scour (m)	-	1.0	1.0
Abutment scour (m)	-	Na	Na
Pier scour (m)	-	1.2	1.3

Drainage area for this crossing:8620 square kilometers

Hydraulic Capacity:..... 2460 cms at low superstructure elevation 78.31 m which has an exceedance probability of equal to or less than 0.2 percent.

Total scour equals contraction scour + local scour

ESTIMATE OF QUANTITIES					
ITEM NO.	ITEM	UNIT	SUBSTR.	SUPERSTR.	TOTAL
501(1)	Class A Concrete	L.S.-m	49	44	93
501(8)	Precast Concrete Deck Panel	Ea.	—	132	132
501(9)	Precast Concrete Pile Cap	Ea.	7	—	7
503(1)	Reinforcing Steel	L.S.-kg.	18,582	1,645	20,227
504(2a)	Structural Steel, Furn., Fab.d and Erected A572m, Grade 345	Kg	—	226,500	226,500
504(2b)	Structural Steel, Furn., Fab.d and Erected A36m, Grade 345	Kg	—	13,017	13,017
505(5)	Structural Steel Piles—Furnished	m	500,115	—	500,115
505(6)	Structural Steel Piles—Driven	Ea.	21	—	21
507(1)	Metal Bridge Railing	m	—	398.200	398.200
606(12)	Guardrail/Bridge Rail Connection	Ea.	—	4	4
611(1)	Riprap, Class II	m ³	205	—	205
631(2)	Geotextile, Erosion Control, Class A	m ²	205	—	205

Item numbers are for reference only. Quantities shown are not necessarily the pay quantities nor the total quantity of the particular item. Reinforcing steel lap lengths are not included in the quantity shown.

PILE TIP ELEVATION		
	DESIRABLE	ESTIMATED
Abut. 1	58.0 m	54.5 m
Pier 2	58.0 m	54.5 m
Pier 3	58.0 m	54.5 m
Pier 4	58.0 m	54.5 m
Pier 5	58.0 m	54.5 m
Pier 6	58.0 m	54.5 m
Abut. 7	58.0 m	54.5 m

PRELIMINARY
FOR DESIGN STUDY

NEWHALEN RIVER BRIDGE
ROUTE S-214
SITE PLAN

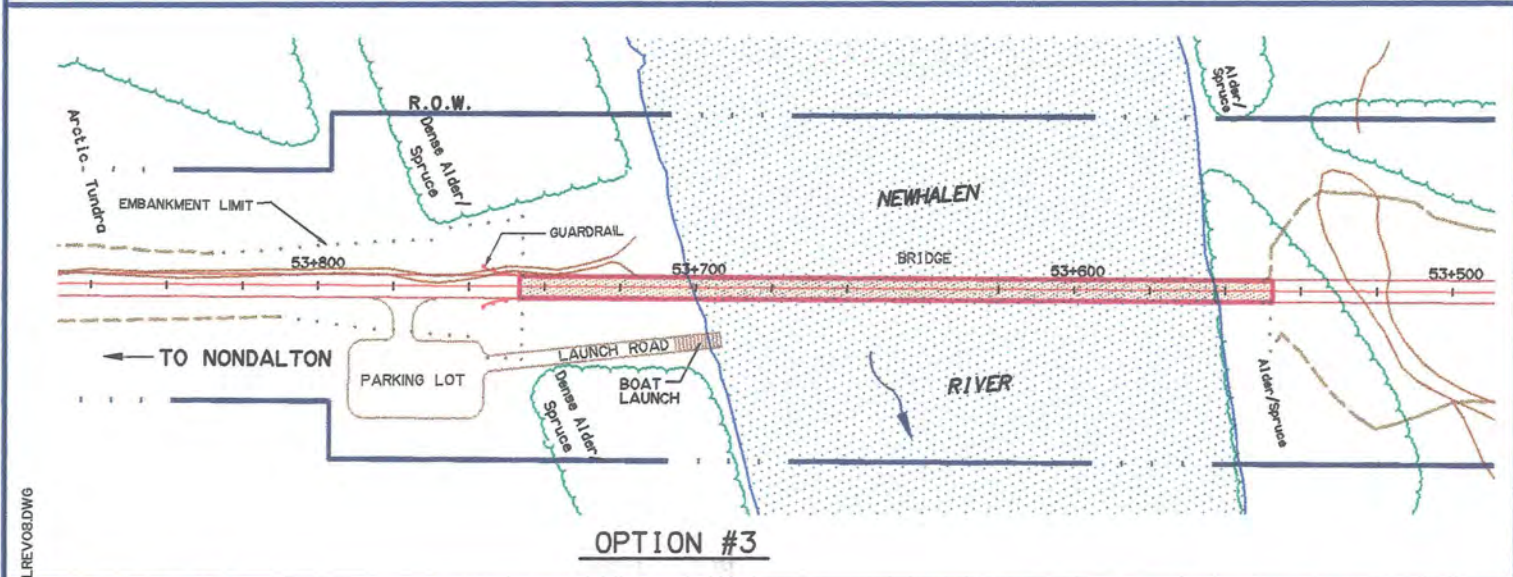
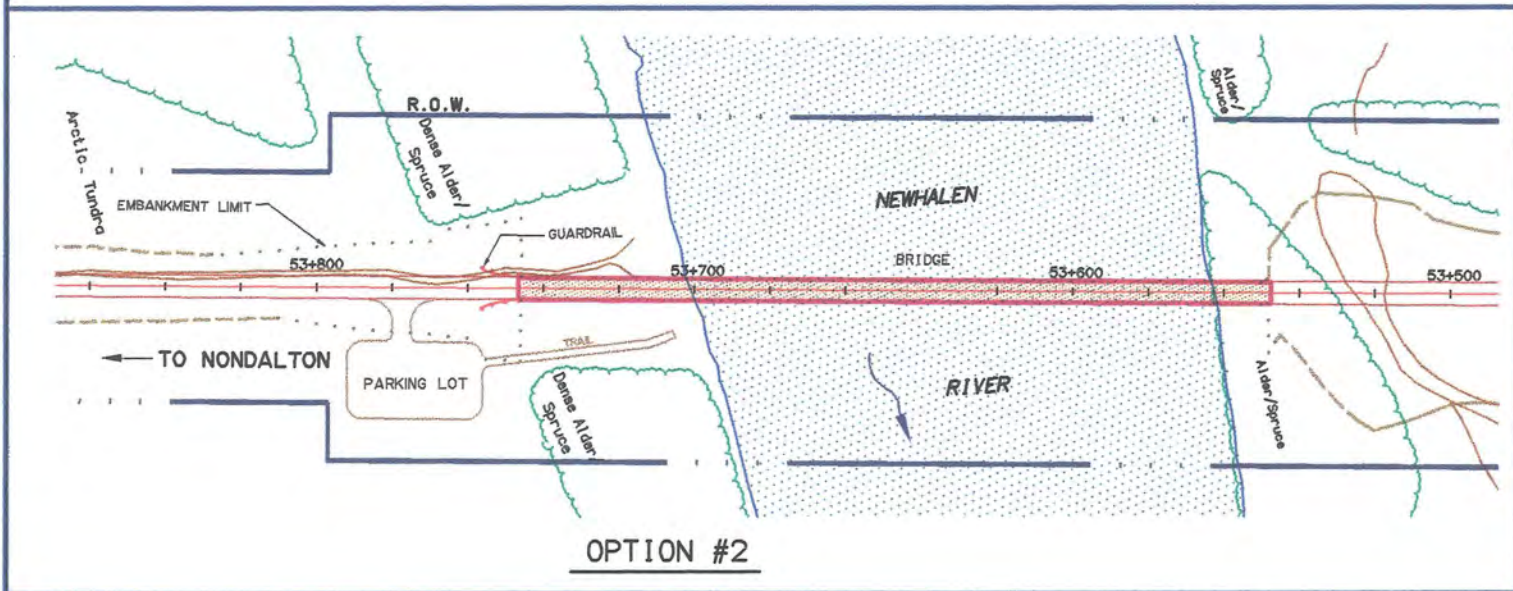
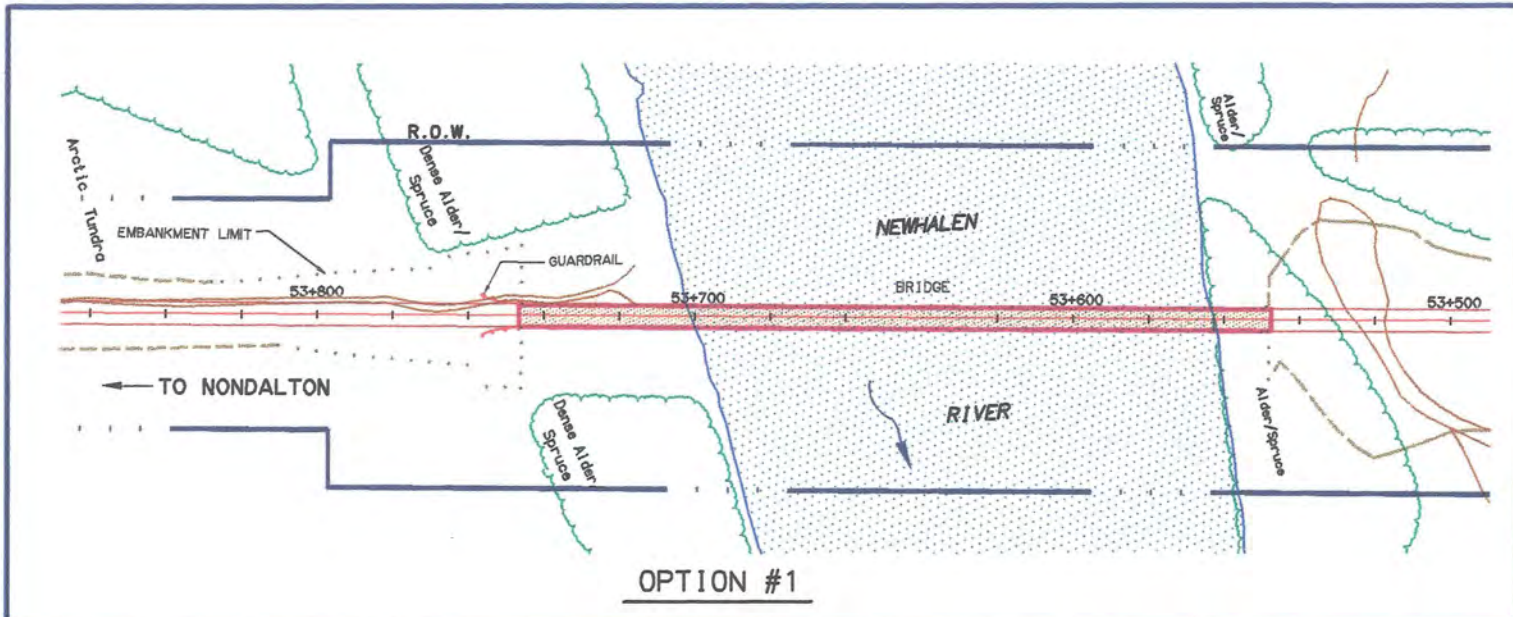
STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
and PUBLIC FACILITIES
JUNEAU, ALASKA



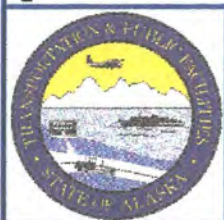
BRIDGE NO. 1286
FIGURE 4

Designed By: EEM
Detail Check By: [Signature]
Design Check By: [Signature]

F: 1286(1286-24)
7/23/97 15:57
Plot Scale = 12:20
Drawn or Revised By: SHS



LREV08.DWG

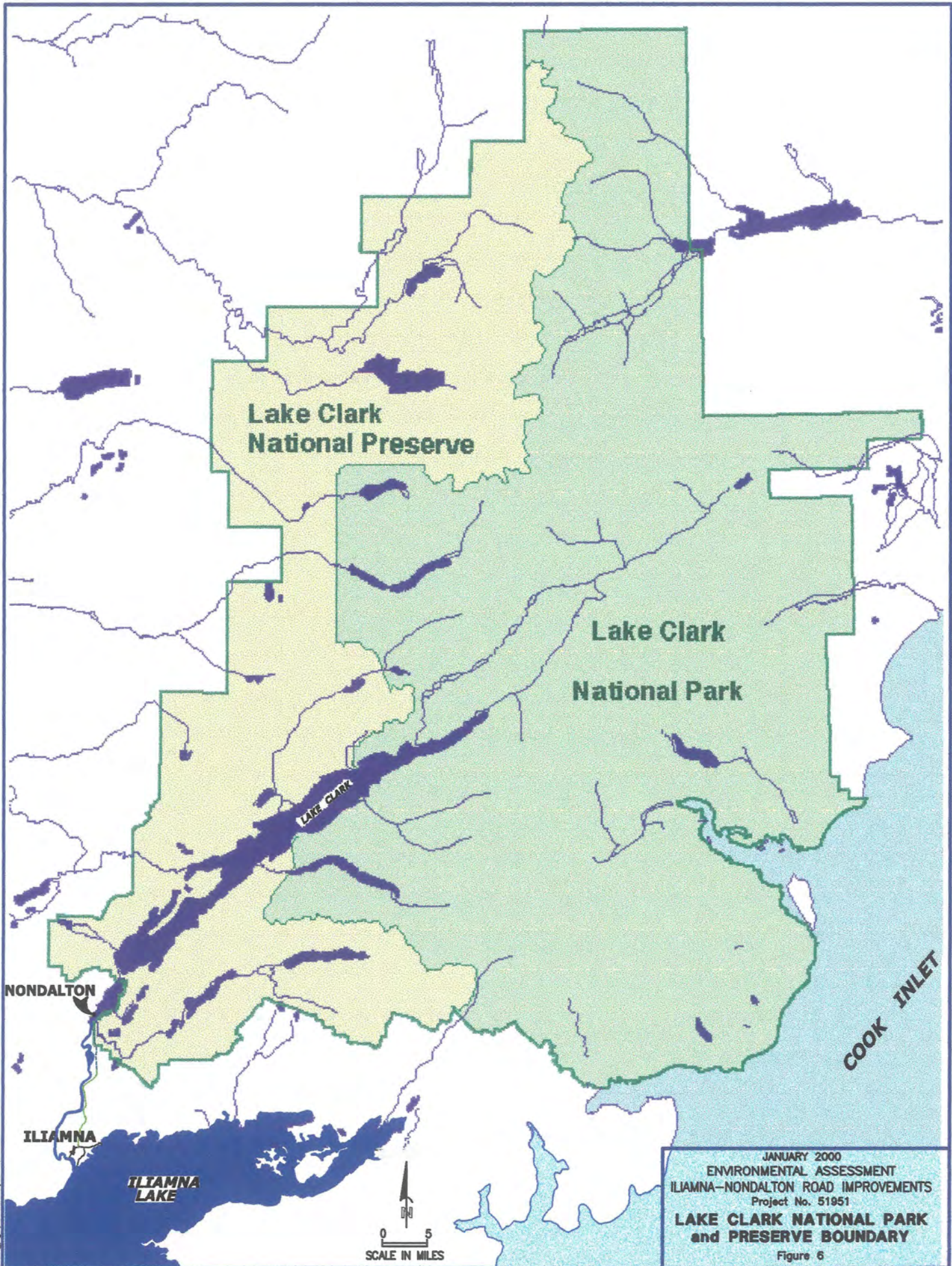


DIVISION OF
STATEWIDE DESIGN AND ENGINEERING SERVICES
PRELIMINARY DESIGN
 AND
ENVIRONMENTAL SECTION



JANUARY 2000
 ENVIRONMENTAL ASSESSMENT
 ILIAMNA-NONDALTON ROAD IMPROVEMENTS
 Project No. 51951
NEWHALEN RIVER ACCESS OPTIONS

Figure 5



Lake Clark
National Preserve

Lake Clark
National Park

LAKE CLARK

NONDALTON

ILIAMNA

ILIAMNA
LAKE

COOK INLET



JANUARY 2000
ENVIRONMENTAL ASSESSMENT
ILIAMNA-NONDALTON ROAD IMPROVEMENTS
Project No. 51951
**LAKE CLARK NATIONAL PARK
and PRESERVE BOUNDARY**
Figure 6

z:\p0\airred.bmp



Photo 1: Typical view of Iliamna-Nondalton Road. INNEC Power Line in the upper right, which parallels roadway. 7-10-96.



Photo 2: Aerial view of Alexcy Creek Bridge, reconstructed in 1995. 5-18-96.

FIGURE 7



Photo 3: Alexcy Creek Bridge, reconstructed in 1995. 7-14-95.



Photo 4: From the bank on the Iliamna side, looking across the Newhalen River towards the ATV trail leading to the Nondalton material site. 7-10-96.

FIGURE 8

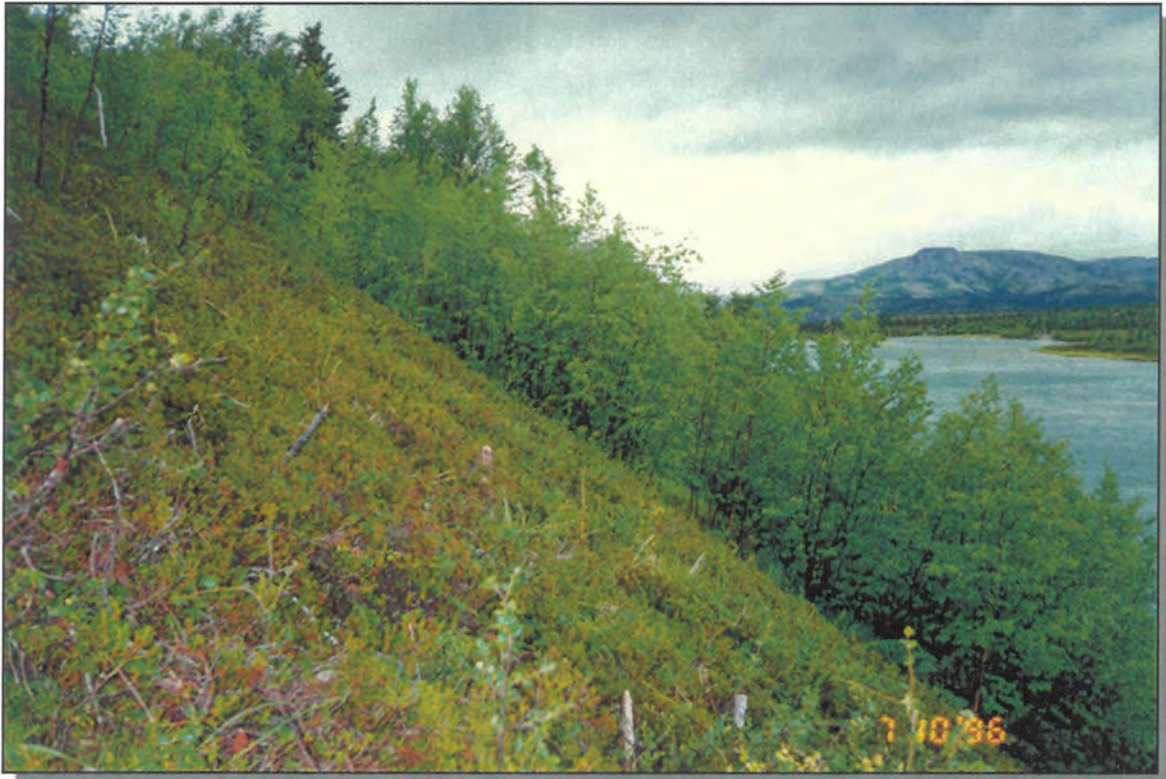


Photo 5: The steep Iliamna bank of the Newhalen River, approximately 60 feet above the opposite Nondalton bank. 7-10-96.



Photo 6: From the bank on the Iliamna side, looking across the Newhalen River towards Nondalton. 6-5-96.

FIGURE 9



Photo 7: Typical view of the ATV trail between the Newhalen River and the Nondalton material site. 7-14-95.



Photo 8: "Fish Village" or "Fish Camp" on the Iliamna side of the Newhalen River, looking across the River towards Nondalton. 6-5-96.

FIGURE 10



Photo 9: Large culvert and eroded bank along the Iliamna-Nondalton Road. 7-10-96



Photo 10: Typical view of erosion along the Iliamna-Nondalton Road. Photo probably taken in 1995.



Photo 11: Aerial view of wide footprint along the Iliamna-Nondalton Road. Looking south towards Iliamna. 5-18-96.



Photo 12: Aerial view of wide footprint along the Iliamna-Nondalton Road. Looking south towards Iliamna. 5-18-96.

FIGURE 12



Photo 13: Eroded road embankment at Lover's Creek. 8-24-99.

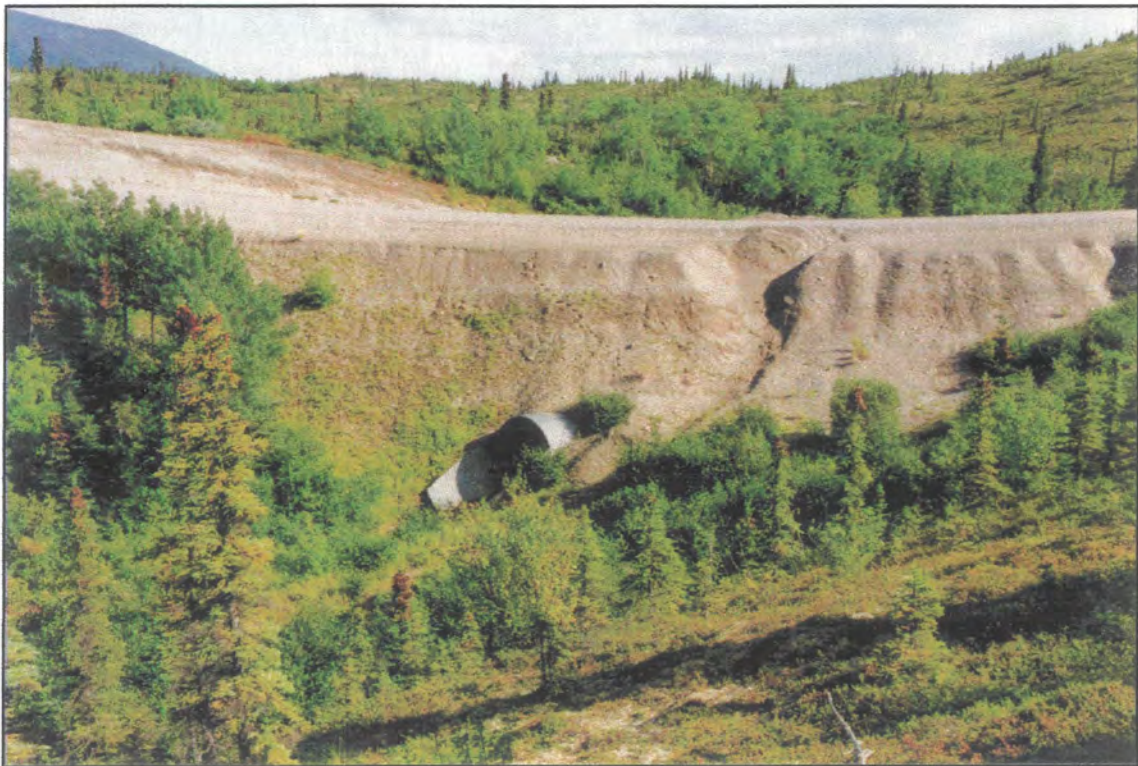


Photo 14: Eroded road embankment at S. Fork Alexcy Creek. Looking at the outlet culvert. 8-24-99.

FIGURE 13

APPENDIX A

APPENDIX A

TABLE OF CONTENTS

1995 INITIAL SCOPING FOR CE:

Agency Field Trip, July 14, 1995.....	A-1
Scoping Letter and Mailing List, September 28, 1995.....	A-3
Newspaper Notice of Environmental Evaluation and Wetlands and Floodplain Involvement	
Anchorage Daily News, October 25, 1995.....	A-11
Bristol Bay News, October 26, 1995.....	A-12

Federal Correspondence

U.S. Coast Guard, October 26, 1995.....	A-13
U.S. Army Corps of Engineers, October 17, 1995.....	A-14
National Marine Fisheries Service, November 1, 1995.....	A-15
U.S. Fish & Wildlife Service, November 1, 1995.....	A-16
U.S. Fish & Wildlife Service, November 9, 1995.....	A-17

State Correspondence

Alaska Department of Fish & Game, November 6, 1995.....	A-18
Alaska Department of Environmental Conservation, August 7, 1995.....	A-21
Alaska Department of Environmental Conservation, November 13, 1995.....	A-23
State Historic Preservation Office, October 16, 1995.....	A-24
State Historic Preservation Office, November 27, 1995.....	A-28

Local Correspondence

Lake and Peninsula Borough, October 26, 1995.....	A-29
Kijik Corporation, August 14, 1995.....	A-31
Bristol Bay Native Corporation, October 30, 1995.....	A-32
Iliamna-Newhalen-Nondalton Electric Co-op, January 26, 1995.....	A-34
Iliamna-Newhalen-Nondalton Electric Co-op, October 18, 1995.....	A-35
Telephone Record ADOT&PF and Iliaska Lodge, November 1995.....	A-37
Iliaska Lodge, November 8, 1995.....	A-38
City of Nondalton, December 6, 1995.....	A-39
City of Nondalton, April 23, 1996.....	A-40
Kijik Corporation, June 27, 1996.....	A-42
Iliamna Natives Limited, September 24, 1996.....	A-43
Iliamna Village Council, September 20, 1996.....	A-44
Iliamna Village Council, September 25, 1996.....	A-45
Newhalen Tribal Council, October 3, 1996.....	A-46
1996 Petition for Project.....	A-47

1996 COMMENTS ON SCIS:

ADOT&PF letter and mailing list (Draft SCIS), September 6, 1996.....	A-56
--	------

Federal Agencies

Corps of Engineers, October 13, 1996 A-59

State Agencies

Alaska Department of Environmental Conservation, October 3, 1996 A-61
Alaska Department of Fish and Game, January 3, 1997..... A-63
DOT Response to ADF&G, January 27, 1997..... A-66

Local Agencies

Bristol Bay Native Corporation, October 3, 1996..... A-70
Bristol Bay Housing Authority, October 3, 1996..... A-71
Lake and Peninsula Borough, October 3, 1996..... A-73
Lake and Peninsula School District, October 4, 1996..... A-74
Bristol Bay Area Health Corporation, October 4, 1996..... A-75
Bristol Bay Area Health Corporation, October 4, 1996..... A-81
Iliamna-Newhalen-Nondalton Electric Cooperative, October 4, 1996..... A-82
Southwest Alaska Municipal Conference, October 7, 1996..... A-84

Public

Moody's Petroleum (Bob Arce), October 7, 1996..... A-85
James Forbes, October 3, 1996 A-86
Geoffrey Y. Parker, Law Office of Geoffrey Y. Parker, October 7, 1996..... A-87

ADOT&PF letter and mailing list (Final SCIS), January 13, 1997..... A-91

1997 - 1999 RE-SCOPING EFFORTS FOR EA:

Merger Agency Re-scoping

Re-Scoping Letter and Mailing List, October 7, 1997..... A-95
Purpose and Need Concurrence Form, October 7, 1997..... A-111
Range of Alternatives Letter and Mailing List, February 27, 1998 A-112
Alternatives to be Analyzed Concurrence Form, February 27, 1998..... A-129
Essential Fish Habitat, July 14, 1999 A-130
Preferred Alternative Letter and Mailing List, July 15, 1999 A-131

Public/Other Agency Re-scoping

Re-Scoping Letter and Mailing List, October 7, 1997..... A-134

Newspaper Notice of Continuing Engineering Studies and Environmental Assessment Development

- 1. Anchorage Daily News, October 13th, 20th and 30th, 1997..... A-142
- 2. Bristol Bay Times, October 16th and 23rd, 1997..... A-143

Public Notices for Public Meetings

- 1. Poster Announcing Iliamna, Nondalton and Anchorage Public Meetings..... A-144
- 2. Distribution to Fish Board Coordinator, Juneau, October 16, 1997..... A-145
- 3. KNBA Radio Announcement, November 3-4, 1997..... A-146
- 4. Project Summary and Public Comments Sheet..... A-147
- 5. Iliamna Public Meeting Summary and Attendance List, October 27, 1997..... A-151
- 6. Nondalton Public Meeting Summary and Attendance List, October 28, 1997..... A-157

7. Anchorage Public Meeting Summary and Attendance List, November 4, 1997.....	A-161
--	-------

Federal Agency Correspondence

Army Corps of Engineers

1. Re-scoping comments, November 5, 1997	A-166
2. Purpose and Need Concurrence Form, November 5, 1997	A-169
3. Alternatives to be Analyzed Concurrence Form, March 16, 1998	A-170
4. Preferred Alternative Concurrence Form, September 3, 1999	A-171
5. Preliminary draft EA telephone record, September 17, 1999	A-172

National Marine Fisheries Service

1. Re-scoping comments, November 17, 1997	A-173
2. Purpose and Need Concurrence Form, November 20, 1997.....	A-174
3. Alternatives to be Analyzed Concurrence Form, April 1, 1998.....	A-175
4. Preferred Alternative Concurrence Form, October 14, 1999.....	A-176

Environmental Protection Agency

1. Re-scoping telephone record, December 9, 1997	A-177
2. Purpose and Need Concurrence Form, December 12, 1997	A-178
3. Alternatives to be Analyzed Concurrence Form, August 5, 1998.....	A-179
4. Preferred Alternative Concurrence Form, August 3, 1999	A-180

Fish and Wildlife Service

1. Re-scoping telephone record, December 11, 1997	A-181
2. Alternatives to be Analyzed telephone record, October 5, 1998.....	A-182
3. Preferred Alternative Concurrence Form, October 29, 1999.....	A-183
4. Preliminary draft EA comments, November 8, 1999	A-184

State Agency Correspondence

Alaska Department of Environmental Conservation

1. Re-scoping comments, November 24, 1997	A-186
2. Purpose and Need Concurrence Form, November 24, 1997.....	A-187
3. Additional re-scoping comments, April 20, 1998.....	A-188
4. Alternatives to be Analyzed Concurrence Form, April 20, 1998	A-191
5. Preferred Alternative Concurrence Form, October 26, 1999	A-192

Alaska Department of Fish & Game

1. Re-scoping comments, November 7, 1997	A-193
2. Purpose and Need Concurrence Form, November 26, 1997.....	A-195
3. Additional re-scoping comments, April 17, 1998.....	A-196
4. Alternatives to be Analyzed Concurrence Form, April 17, 1998	A-198
5. Preferred Alternative Concurrence Form, October 8, 1999	A-199
6. Preliminary draft EA comments, October 8, 1999	A-200

Alaska Department of Natural Resources

1. Re-scoping comments, November 6, 1997	A-204
2. Purpose and Need Concurrence Form, November 25, 1997.....	A-206
3. Alternatives to be Analyzed Concurrence Form, April 13, 1998.....	A-207
4. Preferred Alternative Concurrence Form, September 3, 1999	A-208

State Division of Governmental Coordination

1. Re-scoping comments, October 10, 1997 A-209

Local Agency Correspondence

Lake and Peninsula Borough

1. Purpose and Need Concurrence Form, December 11, 1997 A-210
2. Alternatives to be Analyzed Concurrence Form, April 14, 1998..... A-211
3. Preferred Alternative Concurrence Form, August 31, 1999 A-212
4. Preliminary draft EA comments, August 31, 1999 A-213
5. Resolution 98-18, October 20, 1998 A-215

Bristol Bay Native Corporation

1. October 16, 1997 A-219

Public Correspondence

George Alexie, October 28, 1997..... A-220
Elizabeth Balluta, October 28, 1997..... A-221
Claudine Hobson Greene, October 28, 1997..... A-222
Harry Karshekoff, October 28, 1997..... A-223
Cory Zackar, October 28, 1997 A-224
Jerry Armstrong, November 3, 1997..... A-225
Michael Borleske and Agnes Alexie, Reel Alaska Lodge Inc., November 3, 1997 A-226
Eva LeVeque, November 4, 1997 A-228
Melvin LeVeque, November 4, 1997..... A-230
Thomas E. Meacham, November 5, 1997..... A-231
Mark S. Hickey, Hickey and Associates, November 6, 1997 A-234
Geoffrey Y. Parker, Law Office of Geoffrey Y. Parker, November 7, 1997..... A-237
Bob Arce, Moody’s Petroleum, November 7, 1997..... A-246

ADDITIONAL CORRESPONDENCE (2001):

Federal Agencies

National Park Service, November 26, 2001 A-248

State Agencies

Alaska Department of Fish & Game, October 1, 2001 A-249
State Historic Preservation Office, November 28, 2001 A-250

Local Government and Other Organizations

Lake and Peninsula Borough, October 16, 2001 Resolution 01-25..... A-252
City of Newhalen, November 15, 2001 Resolution 01-06..... A-253
Iliamna-Newhalen-Nondalton Electric Cooperative (INNEC), September 17, 2001 A-254
COMINCO, September 27, 2001 A-255

TRIP REPORT

Project: Iliamna to Nondalton Road Reconstruction
Project No.: 51951
Date: July 14, 1995
Attendees: Debbie Bertossa, Environmental Section, ADOT&PF
Dave Casey, Regulatory Branch, USCOE
Wayne Dolezal, Habitat Section, ADF&G
Jim Helfinstine, Aids to Navigation, USCG
Gary Wheeler, Fish & Wildlife Enhancement, USF&WS
Susan Wick, Environmental Section, ADOT&PF
Hank Wilson, Highway Design, ADOT&PF
Noted By: Debbie Bertossa

The group departed Anchorage at approximately 8:35 a.m. via Security Aviation and arrived in Iliamna at approximately 10:00 a.m. We had a delay at Iliamna in that Tom Greene, Mayor of Nondalton, was unable to meet us as planned and we were not informed of this change. Eventually Hank Wilson rented a vehicle and we drove north on the road from Iliamna to the Newhalen River.

The road, which was built in 1985-86 is in good condition from the airport north to the Alexy Creek bridge at approximately Milepost 8.5. North of the bridge there is no gravel surfacing or roadway base. The cleared road right of way, however, remained very passable for vehicles.

We reached the proposed bridge site at the Newhalen River, approximately 14 miles from Iliamna. The river was approximately 500 feet wide at the crossing site. The road to Nondalton was evident and the Fish Village could be seen to the east. The south side (Iliamna side) is approximately 60 feet higher than the river embankment on the north side (Nondalton side). Hank explained that the roadway approach on the south side will need to be lowered (cut down) to match the other side for the proposed bridge crossing. No wetlands would be impacted from reducing the height of the roadway.

On the return trip to Iliamna, we stopped at several culverts where the embankments were being eroded. We also stopped at Alexy Creek bridge to inspect the maintenance work that had recently been done to protect the bridge abutments from erosion. The bridge itself was in good condition.

We drove into Iliamna and then flew to Nondalton where we were picked up by residents and brought to the city offices. We talked briefly with Tom Greene who arranged for the group to be transported by boat to the bridge site. The north embankment of the proposed bridge crossing, as was mentioned earlier, looks as though it is approximately 60 feet lower than the south side. We landed at the site and walked approximately 300 feet north. The soil was a very dark red volcanic ash predominantly vegetated by low tundra species.

The group returned to the Nondalton airport and we departed at approximately 4:30 p.m. for Anchorage. On the trip back, we flew over the route of the new road from Nondalton to the Newhalen River. The road is in very good condition from the airport to the material site used for the airport project several years ago. From the material site onward to the river, the road is a pioneer access road. The terrain is more mountainous with drainage gullies which will require culvert structures.

We arrived back in Anchorage at approximately 6:30 p.m.

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

CENTRAL REGION - DIVISION OF DESIGN AND CONSTRUCTION
PRELIMINARY DESIGN & ENVIRONMENTAL

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
(FAX 243-6927 - TDD 266-1442)
(907) 266-1508

September 28, 1995

Re: Iliamna - Nondalton Road
Project No. 51951

Environmental Scoping Comments

Mr. Walt Wrede
Manager
Lake and Peninsula Borough
Box 495
King Salmon, AK 99613

Dear Mr. Wrede:

The Alaska Department of Transportation and Public Facilities (ADOT&PF) requests your comments on a project to resurface, restore, and rehabilitate the existing road from Iliamna to the Newhalen River, construct a bridge over the Newhalen River, and reconstruct a pioneer road from the new bridge to the improved road leading to Nondalton (see Figure 1). The purpose of the proposed project is to provide a year round road system between the communities of Iliamna, Newhalen, and Nondalton.

Presently goods and people flying into the regional Iliamna Airport either fly to Nondalton or are transported by vehicle to the Newhalen River and must travel by boat to Nondalton. This process is time consuming and expensive. During the winter, flights into the smaller Nondalton airport are often delayed by weather conditions. The ice on the Newhalen River is often unsuitable to cross.

The three communities have successfully created an electrical coop. Newhalen officials have stated that safe year round surface access would aid in creating other regional cooperative facilities (i.e. landfills, hospitals, schools). In addition, a bridge across the Newhalen River would eliminate fording the river with construction equipment, which is the current practice.

During the 1980's, right of way was acquired and cleared all the way from Iliamna to Nondalton. Portions of the route were improved to various degrees. This project would rehabilitate the route to a uniform 20-foot wide roadway, impacting approximately 4 acres of wetlands from slope

flattening and installation of culverts in the various drainages from the river northward to Nondalton. Embankments will be stabilized to prevent and arrest erosion.

The proposed bridge design would construct a steel girder bridge with four piers. Wingwalls at either end would require approximately 500 cubic yards (c.y.) of material deposited below ordinary high water. The proposed structure would be approximately 540 feet long by 17 feet wide (outside dimensions). Total area of wetlands impact for bridge construction is approximately 11,000 square feet or 0.25 acres.

The roadway approach to the bridge from the south would be straightened and excavated to a lower elevation. No wetlands involvement would result from this action. Material required for construction would be obtained from excavation and an existing upland material source located near Nondalton.

An agency scoping trip took place on July 14, 1995. The group visited Iliamna and Nondalton, drove the road to the Newhalen River from Iliamna and inspected the bridge site from both the north and south approaches (see enclosed photos).

As presently envisioned, ADOT&PF does not anticipate any significant impacts and will be developing a Categorical Exclusion. Permits/approvals necessary to complete the proposed work would include the following:

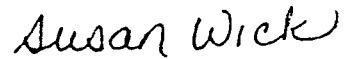
1. A Department of the Army Section 404/10 permit for placement of fill in waters of the U.S.;
2. A U.S. Coast Guard Section 9 permit for bridge construction in a navigable waterway;
3. An Alaska Department of Fish & Game Title 16 permit for work below ordinary high water of the Newhalen River;
4. Alaska Department of Environmental Conservation water quality certification; and
5. Division of Governmental Coordination final coastal consistency determination.

In addition to identifying any concerns and/or issues the city might have with the proposed project, the following information is requested:

1. Identify any existing and/or proposed zoning requirements and/or land use controls in the project area.
2. Identify any other local improvement projects under construction or proposed in the vicinity of the project within the foreseeable future.
3. Is the project supported by the community?

We are requesting that comments on this project be received by our office no later than October 27, 1995. If you have any questions, please call Hank Wilson, Highway Design Chief, at 266-1700, or myself at 266-1507.

Sincerely,

A handwritten signature in cursive script that reads "Susan Wick".

Susan Wick
Environmental Team Leader

/DB

Enclosures

cc: Debbie Bertossa, Environmental Analyst, PD&E
Hank Wilson, P.E., Chief, Highway Design

Regions - 128

Mr. Walt Wrede
Lake and Peninsula Borough
Box 495
King Salmon AK 99613

Ms. Judith Bittner
Dept. Natural Resources
Box 107001
Anchorage AK 99510-7001

Mr. Harvey Analon
Village of Iliamna
P.O. Box 286
Iliamna AK 99606

Mr. Brent Petrie
Box 210
Iliamna AK 99606

Mr. Ted Rockwell
Environmental Protection Agency
222 W. 7th Ave., #19 (Room 537)
Anchorage AK 99513-7588

Ms. Ann Rappoport
U.S. Fish & Wildlife Services
605 W. 4th Ave., Room 62
Anchorage AK 99501

Mr. Ronald Morris
U.S. Dept. of Commerce
222 W. 7th Ave., #43
Anchorage AK 99513-7577

Mr. Don Kohler
COE, Regulatory Branch
P.O. Box 898
Anchorage AK 99506

Mr. Richard Thompson
Land and Water Management
Pouch 107005
Anchorage AK 99510-7005

Mr. Gary Saupé
Dept. of Environmental Conservation
555 Cordova St.
Anchorage AK 99501

Mr. Lance Trasky
AK Dept. of Fish & Game
333 Raspberry Rd.
Anchorage AK 99518

Mr. Jim Helfinstine
Aids to Navigation
Box 25517
Juneau AK 99802-5517

Mr. Brent Petrie
Iliamna-Newhalen Electric Co-op
Box 210
Iliamna AK 99606

Mr. Tom Greene
City of Nondalton
General Delivery.
Nondalton AK 99640

Ms. Sue Flensburg
Box 849
Dillingham AK 99576

Mr. Tom Hawkins
Box 100220
Anchorage AK 99510

SCOPING LETTER BLURBS

Alaska Department of Fish and Game - ADF&G.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

1. Any information and/or data on anadromous or resident fish streams in the vicinity of the proposed project.
2. Identify any State Game Refuges and/or Critical Habitat Areas in the vicinity of the project. If these areas exist in the vicinity, then would the normal activities of these areas be affected by the proposed project?
3. Identify any permits and/or clearances to be obtained from your agency for the proposed project.

Aircarriers - Aircarri.wcm

In addition to identifying any concerns and/or issues your company might have, please provide any information and/or data with respect to airport use, access problems, land use concerns, bird strike problems or conflicts with other animals, subsistence use on or accessed through airport property, accidents, and/or any other special conditions that may be affected by the proposed project.

City or Village - city.wcm

In addition to identifying any concerns and/or issues the city might have with the proposed project, the following information is requested.

1. Identify any existing and/or proposed zoning requirements and/or land use controls in the project area.
2. Identify any other local improvement project under construction or proposed in the vicinity of the project within the foreseeable future.
3. Is the proposed project supported by the community?

U.S. Army Corps of Engineers - coe.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

1. Any information and/or data with respect to the base floodplains, regulatory floodways, and/or special flood hazard areas of drainages that may be affected by the proposed project.
2. Identify any permits and/or clearances to be obtained from your agency for the proposed project.

State or Local Coastal Zone Management - czm.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

1. Identify any potential conflicts with the goals or objectives of the local coastal management program.
2. At the present time, does your agency have any objections to the proposed project?

Alaska Department of Environmental Conservation - dec.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

1. Identify any known or suspected contaminated sites, and registered underground storage tanks that may affect or be affected by the proposed project.
2. Identify any water quality concerns.
3. Any information and/or data on existing (permitted or unpermitted) solid waste landfills, dumps, discharges, or sewage lagoons in the project area.
4. Any information and/or data on existing drinking water supplies in the project area.
5. Identify any permits and/or clearances to be obtained from your agency for the proposed project.

Alaska Department of Natural Resources - dnr.wcm

In addition to identifying any concerns and/or issues the State might have with the proposed project, the following information is requested.

1. Identify any existing and/or proposed land use plans, and identify any land use objectives which may conflict with the proposed project.
2. Identify any existing or proposed State Parks in the vicinity of the project, and identify any Park objectives which may conflict with the proposed project.

Environmental Protection Agency - epa.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

1. Identify any sole source or principal drinking water sources that may be affected by the proposed project.
2. Identify any known contaminated areas or suspected sites in the project area.
3. Identify any permits and/or clearances to be obtained from your agency for the proposed project.

Public (Airports Only!!) - public.wcm

In addition to identifying any concerns and/or issues you might have with the proposed project, please provide any information and/or data with respect to airport use, access problems, land use concerns, subsistence use on or accessed through airport property, and/or any other special conditions that may be affected by the proposed project.

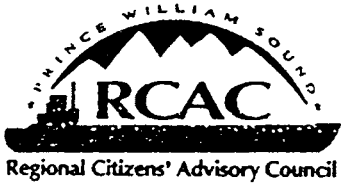
U.S. Fish and Wildlife Service - usf&ws.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

1. Any information on known threatened and/or endangered species in the project area and vicinity.
2. Any information identifying National Wildlife Refuge lands in or adjacent to the project area. If refuge lands are in the vicinity, would the normal activities occurring there be affected by the proposed project?
3. Any information or data on important fish and wildlife habitats potentially affected by the proposal.
4. Any information on known active or inactive eagle nests in the project area.
5. Identify any permits and or clearances to be obtained from your agency for the project.

Spill Prevention: Improvements in Linker Safety"

Report from the Prince William Sound
Citizens' Advisory Council (RCAC)



222 or

CLINIC

- ◆ These clinics will demonstrate the steps to complete your home improvement project
- ◆ All clinics are held at: ◆ 11 A.M. ON SATURDAY ◆ NOON ON SUNDAY

OCTOBER 28TH & 29TH

KITCHEN DESIGN

NOVEMBER 11TH & 12TH

COUNTERTOP DESIGN & INSTALLATION

CLINIC CLUB LOCATION SOUTH OF STORE

LIMITED SEATING. PLEASE CALL TO RESERVE YOUR PLACE.

Spenard builders supply

4412 Lols Drive ◆ Anchorage ◆ 261-9208

Ancho

10 am David
The Adr
Alaskar

1 pm To Go
Profess
iversity
Checkli
decision

3 pm Flying
Dean E
present
and you



Presented
Admission
Counts by

Halloween & Quilts Unlimited

Trick or Treat Specials -
October 25-29

Our fabric is overflowing onto our
car - help us clear the way! We have a
great assortment of Halloween &
Christmas prints!

20% OFF Fabrics
Cottons and cotton flannels.

20% OFF All Books

20% OFF All Patterns
(Sewing, Craft, and Clothing)

20% OFF Notions
Everything that helps you sew)

Have a great assortment of 100% cottons to choose
- some 1700! Because of their high quality, they
are great quilts and craft items as well as cotton
on clothing. It is time to start your fall projects!

The Shop looks great - Stop by and join in our free
demonstrations. Classes are available for the beginner as
well as the advanced quilters. Pick up a class schedule!

LOCATED AT THE
SHEFFMAN
BUSINESS PARK

345-4839

HOURS:
SUNDAY 12-5
M-W 10-5:30
THURS. 10-7
FRI. 10-5:30
SAT. 9-5:30

VISA
MasterCard

ILLIAMNA TO NONDALTON ROAD RECONSTRUCTION PROJECT NO. 51951

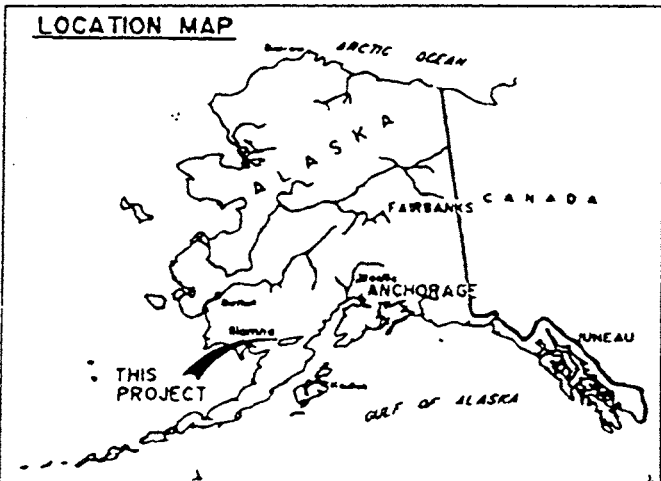
Notice of Environmental Evaluation and Wetlands and Floodplain Involvement

The Alaska Department of Transportation & Public Facilities (ADOT&PF) is preparing an environmental document for a roadway rehabilitation project from the village of Iliamna north to the village of Nondalton, a distance of approximately 15.5 miles. The project would include construction of a 540-foot long by 17-foot wide bridge over the Newhalen River. The purpose of the proposed project is to provide a reliable, year round road system between the communities.

Pursuant to Executive Orders 11990 and 11988, the Department is providing notice of the proposal's involvement in wetlands and floodplains. Approximately 4.3 acres of wetlands would be impacted associated with road reconstruction and bridge installation.

To ensure that concerns are considered in the development of this project, the Department is requesting public comments. Please provide your comments and/or concerns to the address below by 4:00 p.m. Wednesday, November 15, 1995. For questions and/or more information, contact Hank Wilson, P.E., Chief of Highway Design, at 266-1700. Individuals with a hearing impairment can contact ADOT&PF at their Telephone Device for the Deaf (TDD) number, 266-1442.

Susan Wick, Environmental Team Leader
Preliminary Design & Environmental
ADOT&PF
P.O. Box 19600
Anchorage, Alaska 99519-6900



MATANUS NOTICE OF EX 1989 & EARLI

Notice is given pursuant to
real properties listed
foreclosure were on
Susitna Borough of
Court for the Third
Property Tax Forec

The properties for
decreed of said Cou
the cities of Houst
Susitna Borough. C
for which foreclos
and earlier years.

The time for red
November 17, 1995
by Alaska Statute
the property by pa
and costs to the
Department, 350 E
MADE BY CERT
made payable to

WARNING: Unless
November 17, 1995
judgment and dec
to the Matanuska
the period of red
the properties will
Borough, subject
pursuant to AS 29

Publish October 19 1995

*Published (A-1) 25, 1995
Anchorage Daily News*

STATE OF ALASKA
DEPT OF TRANS & PF
PRELIM. DESIGN & ENVIRONMENTAL
PO BOX 196900
ANCHORAGE AK 99519

AIO# 35962
AO/PO#25-5860

ALASKA NEWSPAPERS, INC.
336 EAST 5th AVENUE
ANCHORAGE AK 99501

AFFIDAVIT OF PUBLICATION

UNITED STATES OF AMERICA, STATE OF ALASKA, THIRD DIVISION.
BEFORE ME, THE UNDERSIGNED, A NOTARY PUBLIC THIS DAY
PERSONALLY APPEARED JEANNIE R. SCHWARTZ WHO, BEING FIRST
DULY SWORN, ACCORDING TO LAW, SAYS THAT SHE IS THE BILLING
CLERK OF THE BRISTOL BAY TIMES PUBLISHED AT ANCHORAGE IN SAID
DIVISION THREE AND STATE OF ALASKA AND THAT THE ADVERTISEMENT,
OF WHICH THE ANNEXED IS A TRUE COPY, WAS PUBLISHED IN SAID
PUBLICATION ON THE 26TH DAY OF OCTOBER, 1995 AND THEREAFTER
FOR ZERO CONSECUTIVE WEEKS, THE LAST PUBLICATION APPEARING
ON THE 26TH DAY OF OCTOBER, 1995 AND THAT THE RATE CHARGED
THEREON IS NOT IN EXCESS OF THE RATE CHARGED TO PRIVATE
INDIVIDUALS.

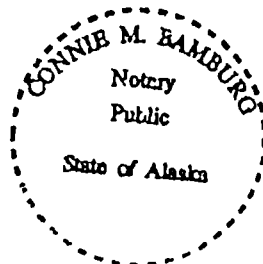
A-12

Jeannie R. Schwartz

JEANNIE R. SCHWARTZ
BILLING CLERK - THE BRISTOL BAY TIMES

SUSCRIBED AND SWORN TO BEFORE ME THIS 13th DAY OF Nov.
1995.

Connie M. Bamburg
CONNIE M. BAMBURG
NOTARY PUBLIC FOR STATE OF ALASKA
MY COMMISSION EXPIRES ON AUGUST 15, 1999



ILLIAMNA TO NONDALTON ROAD CONSTRUCTION PROJECT NO. 51951

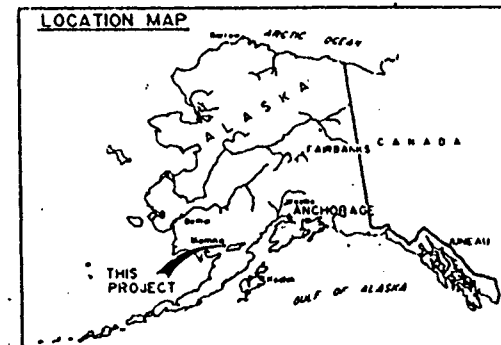
Notice of Environmental Evaluation and Wetlands and Floodplain Involvement

The Alaska Department of Transportation & Public Facilities (ADOT&PF) is preparing an environmental document for a roadway rehabilitation project from the village of Iliamna north to the village of Nondalton, a distance of approximately 15.5 miles. The project would include construction of a 540-foot long by 17-foot wide bridge over the Newhalen River. The purpose of the proposed project is to provide a reliable, year round road system between the communities.

Pursuant to Executive Orders 11990 and 11988, the Department is providing notice of the proposal's involvement in wetlands and floodplains. Approximately 4.3 acres of wetlands would be impacted associated with road reconstruction and bridge installation.

To ensure that concerns are considered in the development of this project, the Department is requesting public comments. Please provide your comments and/or concerns to the address below by 4:00 p.m. Wednesday, November 15, 1995. For questions and/or more information, contact Hank Wilson, P.E., Chief of Highway Design, at 266-1700. Individuals with a hearing impairment can contact ADOT&PF at their Telephone Device for the Deaf (TDD) number, 266-1442.

Susan Wick, Environmental Team Leader
Preliminary Design & Environmental
ADOT&PF
P.O. Box 196900
Anchorage, Alaska 99519-6900



U.S. Department
of Transportation

United States
Coast Guard



Commander
Seventeenth Coast Guard
District

P.O. Box 25517
Juneau, Alaska 99802-5517
Staff Symbol: oan
Phone: (907)463-2245

OCT 31 '95

16590

OCT 26 1995

Mr. Steven R. Horn, P.E.
Alaska Dept. of Transportation and
Public Facilities, Central Region
Anchorage, Alaska 99512-6900

Dear Mr. Horn:

A Coast Guard bridge permit will be required for your proposed bridge over the Newhalen River leading to Nondalton, Alaska. It is our understanding that this structure will complete a road system planned to provide year round access between the Alaska Peninsula communities of Iliamna, Newhalen, and Nondalton.

Coast Guard concerns related to this project at this time involve navigational impacts of your proposed bridge and the possible impacts to navigation during construction. In order for us to determine the vertical and horizontal openings under the bridge necessary to provide for the reasonable needs of navigation we request that you provide the following information:

A description of the waterway use on the Newhalen River, along with a description of the types, sizes, and navigational clearances requirements of the vessels presently operating on the waterway.

It is our understanding that this waterway is part of a unique and historic Alaska Peninsula transportation system. In addition, proposed mining ventures in the area may necessitate the use of the waterway for additional barge use.

If you have any questions, please contact me at 463-2248.

Sincerely,

J. N. HELFINSTINE
Chief, Bridge Section, Aids to
Navigation & Waterways Management Branch
U. S. Coast Guard
By direction of the Commander

Copy: (1) Federal Hwy Administration

	COPY	ACTION
Prelim. Design & Environmental Section		
D&E Engr.		AK
Project Mgr.		AK
Survey Mgr.		
Env. Leader	SW	/
Staff	DB	/
	CS	/
Project File		/
Control File		/

51951



DEPARTMENT OF THE ARMY
 U.S. ARMY ENGINEER DISTRICT, ALASKA
 P.O. BOX 898
 ANCHORAGE, ALASKA 99506-0898

RECEIVED

NOV 02 '95

REPLY TO
 ATTENTION OF:

OCTOBER 27 1995

Regulatory Branch
 Permit Evaluation Section - North
 9-830477

Ms. Susan Wick
 Alaska Department of Transportation
 and Public Facilities
 4111 Aviation Avenue
 Post Office Box 196900
 Anchorage, Alaska 99516-6900

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.	/	
Project Mgr. <i>H. Hansen</i>		
Locations		
Env. Team <i>Keagen</i>		
Staff <i>CSA</i>		
<i>Jim Wick</i>		
Project File	/	
Central File		/

SF51

Dear Ms. Wick:

This is in response to your scoping letter dated September 28, 1995, requesting information concerning the Iliamna - Nondalton road project (DOT #51951). The proposed river crossing is located in SE 1/4 SE 1/4 section 1, T. 3S, R. 33W, Seward Meridian, approximately 14 miles north of Iliamna, Alaska.

A search of our database indicates that permit Number 4-830477 was issued on February 2, 1984, to "place approximately 100 cubic yards (cy) of fill at Bear Creek and a total of 6,000 for bridge approach abutments at the Newhalen River." This permit expired on February 2, 1987.

The only floodplain information we have comes from Coast Guard Public Notice 17-01-88 dated January 28, 1988. The notice states that the 100 year flood elevation is 254.6 feet above mean sea level.

You have indicated that the discharge of dredged and/or fill material into waters of the U.S. would be needed for this project; we agree with this statement. Therefore, the project will require a permit pursuant to Section 404 of the Clean Water Act. The type of permit will be decided when you submit your application.

We appreciate your cooperation with the Corps of Engineers' Regulatory Program. Please refer to file number 9-830477 in future correspondence or if you have any questions. You may contact me at the above address, ATTN: CENPA-CO-R-N, or call me at 753-2712, or by FAX at 753-5567.

Sincerely,

Dave C. Casey

Dave C. Casey
 Project Manager
 Project Evaluation Section - North

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
CENTRAL REGION - DESIGN & CONSTRUCTION
PRELIMINARY DESIGN & ENVIRONMENTAL SECTION

TELEPHONE RECORD

DATE November 1, 1995 TIME 4:10 p.m.
TO Jeanne Hanson PHONE 271-5006
REPRESENTING National Marine Fisheries Svc. LOCATION Anchorage
FROM Debbie Bertossa, ADOT&PF
PROJECT Iliamna to Nondalton Road
PROJECT NO. 51951
SUBJECT Agency Scoping Comments

Jeanne returned my call to state that she would like to comment on the proposed project at Iliamna-Nondalton. She said she would prefer to echo the concerns of the Alaska Department of Fish & Game regarding construction of the bridge and would not want to second guess their recommendations. She agreed that the proposed site of the crossing would be the least damaging since the road already is in place at that location.

I told Jeanne I would type this conversation as a telephone log and forward a copy to her office for their files.

cc: Jeanne Hanson, NMFS
Hank Wilson, P.E., Highway Design, ADOT&PF
Susan Wick, PD&E, ADOT&PF

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
CENTRAL REGION - DESIGN & CONSTRUCTION
PRELIMINARY DESIGN & ENVIRONMENTAL SECTION

TELEPHONE RECORD

DATE November 1, 1995 TIME 11:15 a.m.
TO Gary Wheeler PHONE 271-2780
REPRESENTING U.S. Fish & Wildlife Service LOCATION Anchorage
FROM Debbie Bertossa, ADOT&PF
PROJECT Iliamna to Nondalton Road
PROJECT NO. 51951
SUBJECT Agency Scoping Comments

I contacted Gary to ask if he had comments on the above-referenced project. He stated that he did not have much to say regarding the minor road improvements as proposed. He did not have a feel to the spawning habitat present at the proposed bridge site and thought that mitigation for loss of spawning habitat associated with the inwater piers would be appropriate. When asked what he had in mind he said that he was not sure yet. I told he that we could not promise anything. The purpose of the bridge would be to prevent heavy machinery from fording the river.

I told Gary that I would type a telephone log of our conversation as his comments and forward a copy to him for his files.

cc: Gary Wheeler, USF&WS
Hank Wilson, P.E., Highway Design, ADOT&PF
Susan Wick, PD&E, ADOT&PF

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
CENTRAL REGION - DESIGN & CONSTRUCTION
PRELIMINARY DESIGN & ENVIRONMENTAL SECTION

TELEPHONE RECORD

DATE November 9, 1995 TIME 1:15 p.m.
FROM Brian Anderson, Endangered Species PHONE 271-2777
REPRESENTING USF&WS LOCATION Anchorage
TO Debbie Bertossa, ADOT&PF
PROJECT Iliamna to Nondalton Road
PROJECT NO. 51951
SUBJECT Section 7, Endangered Species Applicability

I contacted Brian to check if the proposed project to improve the road between Iliamna and Nondalton would impact endangered species, as required under Section 7 of the Endangered Species Act.

Brian stated that the American peregrine falcon may migrate through the area, but the project would not impact the species. If he obtains any other information, he will contact me.

DB\

cc: Brian Anderson, Endangered Species, USF&WS
Susan Wick, Environmental Team Leader, ADOT&PF
Hank Wilson, Highway Design Chief, ADOT&PF

MEMORANDUM

State of Alaska

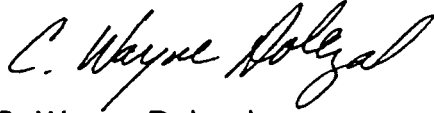
DEPARTMENT OF FISH & GAME

TO: Susan Wick
 Environmental Team Leader
 Central Region Design
 Department of Transportation
 and Public Facilities

DATE: November 6, 1995

FAX NO.: 267-2464

TELEPHONE NO.: 267-2285



SUBJECT: Iliamna - Nondalton Road
 Project N° 51951
 Scoping Comments

FROM: C. Wayne Dolezal
 Habitat Biologist
 Region II
 Habitat and Restoration Division
 Department of Fish and Game

The Alaska Department of Fish and Game (ADF&G) has reviewed the scoping document for the subject project. We understand that the project entails upgrade and completion of the Iliamna Airport to Nondalton road originally designed by the Alaska Department of Transportation and Public Facilities under project number A-80811. Included in the current project are plans to cross the Newhalen River using a 540 foot long, 17 foot wide (outside dimensions) steel girder bridge having four piers.

During our July 14, 1995, field trip, several items of concern were identified. They include: 1) erosion of the road prism at several culverted stream crossings, 2) the slope of the road approach to the bridge at the Newhalen River crossing, and 3) road maintenance techniques utilized on that portion of the road not currently maintained by the state.

RECEIVED

NOV 08 '95

Erosion: At several locations south of Alexie Creek, stream crossings were made using culverts. Although the culverts appear to have been installed to adequately provide for upstream and downstream movement of fish, the shoulders of the road have begun to erode. In at least two locations, gullies about 6 feet deep have been formed. The silt, sand, and gravel from the road prism have formed alluvial fans and some have entered the streams. We recommend that during the upgrade of the existing road, plans for stabilizing the road prism at the stream crossings be included. At locations having large quantities of fill we would encourage consideration of using terraces, headwalls, and revegetative techniques or some combination thereof to prevent future erosion which results in sedimentation of the streams.

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.	<input checked="" type="checkbox"/>	
Project Mgr.	<input type="checkbox"/>	
Locations	<input type="checkbox"/>	
Env. Team Leader Staff	<input checked="" type="checkbox"/>	
Project File	<input checked="" type="checkbox"/>	
Central File	<input checked="" type="checkbox"/>	

Bridge Approach: As summarized in the scoping document, a concerted effort should be made to ensure that the road approaches to the bridge be designed and constructed to avoid collecting, transporting, and discharging road runoff water and sediment in the Newhalen River.

Road Maintenance: As with our concern for the bridge approaches, the proper maintenance of the road surface is important. Currently used maintenance methods on the non-state maintained part of the road result in construction of a gravel berm on each side of the road. As a result, water does not run from the roadway into roadside ditches. The net affect at many of the stream crossings is the road acting as a giant flume that collects and transports water and sediment to the lowest elevation, normally right on top of the stream. This has undoubtedly led to some of the problems with road prism erosion identified above. Who will be responsible for road maintenance when this project is completed?

In response to your questions, the following information is provided:

1. The Newhalen River has been specified as being important for the spawning, rearing, or migration of anadromous fish pursuant to AS 16.05.870(a). In the vicinity of the bridge, the system supports sockeye salmon, Arctic char, and several resident species of fish. In addition, Alexie Creek and Bear Creek have been specified as being important for the spawning, rearing, or migration of anadromous fish pursuant to AS 16.05.870(a). Both systems provide sockeye salmon spawning habitat and Arctic char habitat. The road also crosses several other streams which support resident fish species.
2. There are no legislatively designated special areas (i.e., State Game Refuges, Sanctuaries, or Critical Habitat Areas) near the project site.
3. A Fish Habitat Permit would be required if any project related activities (e.g., either placement of fill or removal of material, equipment operation, fording, barge offloading ramps or bulkheads, bank stabilization, ice bridges or winter stream crossings, etc.) were to be conducted below the ordinary high water level of specified anadromous fish waterbodies such as the Newhalen River, Bear Creek, or Alexie Creek. A Fish Habitat Permit would also be required if any project features in resident fish waters would result in hindering the ability of fish to move upstream or downstream.

We appreciate the opportunity to comment and look forward to review of a more detailed project design and environmental assessment document. Should you have any questions, please do not hesitate to contact me at 267-2285.

cc: J. Regnart, ADF&G
M. Minard, ADF&G
D. Sellers, ADF&G
H. Wilson, ADOT&PF
D. Bertossa, ADOT&PF
W. Wrede, Lake and Peninsula Borough

OCT 27 '95

MEMORANDUM STATE OF ALASKA

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Anchorage Western Public Service Area Office

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
<i>Project Mgr.</i>		
Survey Mgr.		
Env. Leader	<i>SW</i>	
Staff	<i>RB</i>	
	<i>CS</i>	
Project File		
Central File		

TO: Gary Saupe
Env. Specialist

DATE: August 7, 1995

FROM: Keven K Kleweno, P.E.
KK Environmental Engineer

SUBJECT: US Army Corps of Engineer
Applications and other reviews *51951*

I have completed my review of several projects that you forwarded to this office. I offer the following comments:

Rehabilitate the existing road from Iliamna to the Newhalen, ADEC Project Number 9625-WQ-278-122

- This submittal was a letter to you regarding the upgrade of the existing road from Iliamna to Newhalen with a new bridge at the Newhalen River. I have reviewed the letter and recommend that DOT/PF be made aware of the following
 - The total area to be disturbed will need to be determined. If greater than five acres, which it should be NOI will need to be filled with EPA and a SWPPP will need to be on site at all times.
 - It appears that we could require a plan review for the storm water collection and treatment after the construction is completed. The submitted photographs show erosion problems that will need to be addressed during and after construction.
 - Again, from the submitted photographs it appears that the water quality of the Newhalen river is very good. I recommend that the Department require plan review for the steps that DOT/PF will take to ensure that water quality impacts will be very minimal while the bridge is installed. We should support the Department of Fish and Game on their requirements regarding stream bank protection.
 - Although it may not be a large concern to this Department, but it does effect water quality, is how the bridge is designed. Will the installation of the bridge result in any changes to the hydrology of the river? Will the bridge cause the river to relocate/move the active erosional areas in this area of the river?

At this time, I could not locate any information that the Newhalen River is being used as a drinking water source. This does not imply that the river is not a source of drinking water.

Kanektok River 9, ADEC Project Number 9625-WQ-270-116

1. If the existing tank farm is as bad as most, I agree that it should be replaced. The problem here is that which is the worst contaminate, soil or hydrocarbons. I recommend that the Department issue the water quality certification with the following requirements:
 - The slopes of the berms be revegetated prior to July 15 of the year that the project is completed.
 - The discharge from the tank farm is covered under 18 AAC 72, Wastewater Disposal Regulations. As a result, all discharges will need to be approved by the Anchorage/Western Public Service Area Office.
 - Verification that the proposed liner was properly installed should be submitted to the Department. I recommend as-built engineering plans be submitted to the Department under the stamp of a Professional Engineer for the verification that the liner was properly installed .

Narrow Cape 1, ADEC Project Number 9625-WQ-270-117

1. No information was included on storm water runoff control during construction and the useful life of the facility. Although not stated, it appears that the applicant is looking at dealing with storm water issues during construction and during the use of the road and the facility. If this was in Anchorage, I would recommend that the Department not issue the necessary water quality cert. However, it is on Kodiak not in Anchorage, and there are no known impacted water bodies that intersects with this project. Therefore, I recommend that the Department issue the necessary water quality certification with the following requirements:
 - Plan review is required under 18 AAC 72.210 for the proposed domestic wastewater disposal system. Plan review is required under 18 AAC 80.300 for the proposed public drinking water system. I recommend that the applicant contact Mr. Bill Rieth, P.E., of this Department 's Kodiak field office for more information.
 - The total area that will be distributed will need to be calculated and if it is greater than five acres, the applicant will need to file an NOI with EPA and have a SWPPP on site at all times. If less than five acres, a plan review should be required under 18 AAC 72.600. This site is in a Coast Zone Area which does require the Department to address storm water issues.
 - Copies of all correspondence should be cc to the Kodiak Field Office.

Thank you for the opportunity to offer comments on the above-referenced projects. If you have any questions, please do not hesitate to contact me.

KKK/pt



MEMORANDUM

STATE OF ALASKA

Department of Transportation and Public Facilities
Central Region—Division of Design and Construction
Preliminary Design and Environmental

To: Keven K. Kleweno, P.E.
Environmental Engineer
Alaska Department of
Environmental Conservation

Date: November 13, 1995

File No.: 51951

Phone No.: 266-1507

From: Susan Wick *sw*
Environmental Team Leader

Subject: Agency Review Comments
Iliamna to Nondalton Road
Project No. 51951

Thank you for your comments regarding the proposed roadway improvement project between Iliamna and Nondalton. We will supply your office with a copy of the project plans when design of the road and bridge become finalized.

If you have any questions, please contact me or Hank Wilson, P.E., Chief of Highway Design, at 266-1700.

/DB

cc: Debbie Bertossa, Environmental Analyst, PD&E
Hank Wilson, P.E., Chief, Highway Design

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS AND OUTDOOR RECREATION
OFFICE OF HISTORY AND ARCHAEOLOGY

3601 C STREET, SUITE 1278
ANCHORAGE, ALASKA 99503-5321
PHONE: (907) 762-2622
FAX: (907) 762-2628

RECEIVED

October 16, 1995

OCT 19 '95

File No.: 3130-2R DOT/PF

Subject: Project No. 51951 Iliamna - Nondalton Road

Susan Wick
Preliminary Design and Environmental
Central Region - Division of Design and Construction, DOT&PF
P.O. Box 196900
Anchorage, AK 99519-6900

	COPY	ACTION
Project Design & Environmental Section		
PD&E Engr.	<i>OK</i>	
Project Mgr.		
	<i>SW</i>	<i>X</i>
	<i>OB</i>	<i>X</i>
	<i>Har</i>	<i>X</i>
Next File		
Arch File		

Dear Ms. Wick;

Thank you for your letter on the referenced project. We have searched our records and find that there are two unevaluated historic properties in the area of potential effect. These are Fish Village (ILI-004) and Bear Creek (ILI-012). The AHRS cards are enclosed. Very little of the project area has been archaeologically surveyed. Much of it appears to have high potential to contain additional sites.

We recommend that portions of the project area receive an archaeological survey. These portions are 1) the Bear Creek area to locate and evaluate ILI-012, and 2) the areas marked in red and/or yellow on your map, from roughly one mile north of Alexy Creek to the materials site about one mile south of Nondalton.

Please contact Tim Smith at 762-2625 if there are any questions or if we can be of further assistance.

Sincerely,

Judith E. Bittner
State Historic Preservation Officer

JEB:tas

cc: Chuck Holmes, OHA

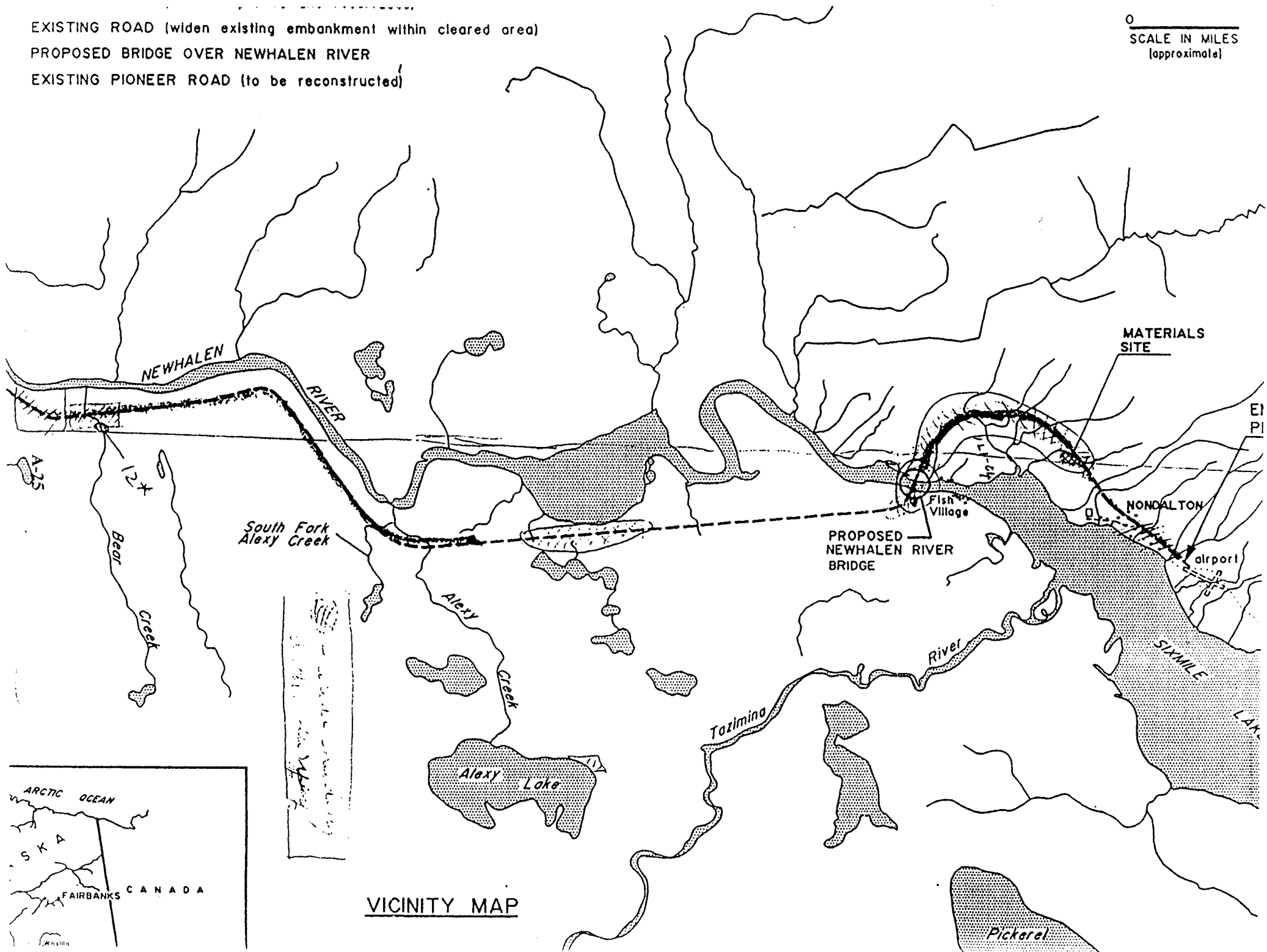
Enclosures

EXISTING ROAD (widen existing embankment within cleared area)

PROPOSED BRIDGE OVER NEWHALEN RIVER

EXISTING PIONEER ROAD (to be reconstructed)

0
SCALE IN MILES
(approximate)



Alaska Heritage Resources Survey

SITE #: ILI-004

MAPSHEET: D5 •SEC.1,T3S,R33W,SM+
59°56'45"N/154°51'50"W AREA:
UTM:

↳ FISH VILLAGE

Local name reported by P.S. Smith (1917), USGS.

SITE SIGNIFICANCE:

LOCATION:

At the southwest end of Sixmile Lake, at the outlet
into Newhalen River, approx. 3km SSW of Nondalton.

CITATIONS:

Orth, D.J. 1971:339

DANGER OF DESTRUCTION:

ASSOCIATED DATE:

PERIOD: Historic

RESOURCE NATURE: Site

CULTURAL AFFILIATION:

PRESERVATION STATUS:

OWNER:

Native Withdrawal

REPOSITORY:

ACCESSION #:

BIA/BLM#:

RELIABILITY: B1

OTHER#:

CODED BY: WJ

CONDITION: E
ENVIRONMENT: 020307

NHR DATE: / /

DATE OF ENTRY: 02/24/74; 09/30/86
DATE OF PRINTOUT: 10/16/89

Alaska Heritage Resources Survey

SITE #: ILI-012

MAPSHEET: D6 .SEC.13,T4S,R33W,SM*
59°49'40"N/154°52'30"W AREA:
UTM:

↳ BEAR CREEK SITE

A minimum of 12 semi-subterranean houses and several cache pits were located on two river terraces above Bear Creek, along the southern base of a large esker ridge. Most of the houses were single room structures, an average 10' x 10' in size, although at least two were double room structures. All have entry tunnels, and some deep houses have rotted foundation logs. [There is some discrepancy in the site location, which was shown to Townsend by Leonard McMillan of Iliamna. A sketch added to a USGS map by Townsend, indicates a location in SEC.6,SEC.7,T5S,R33W,SM (D6); a location plotted on the original AHRS map indicated a location in SEC.18,T4S,R32W,SM (D5); Townsend's written description gives the approximate location now used.]

SITE SIGNIFICANCE:

LOCATION:

On the north bank of Bear Creek, east of Newhalen River, about 1/4 mile east of the Nondalton portage road.

CITATIONS:

Townsend, J.B 1968:ms

DANGER OF DESTRUCTION:

ASSOCIATED DATE:

PERIOD: Prehistoric

RESOURCE NATURE: Site

CULTURAL AFFILIATION:

PRESERVATION STATUS:

OWNER:

Native Withdrawal

REPOSITORY:

ACCESSION #:

BIA/BLM#:

RELIABILITY: A2

OTHER#:

CODED BY: WJ

DATE OF ENTRY: 02/26/74; 09/30/86

DATE OF PRINTOUT: 10/16/89

CONDITION: C
ENVIRONMENT: 030712

NHR DATE: / /



MEMORANDUM

STATE OF ALASKA


Department of Transportation and Public Facilities
Central Region-Division of Design and Construction
Preliminary Design and Environmental

To: Tim Smith
Archaeologist
State Historic Preservation Office
ADNR

Date: November 27, 1995

File No.: 51951

Phone No.: 266-1511

From: Deborah Bertossa 
Environmental Analyst

Subject: Iliamna-Nondalton Road
Project No. 51951
Cultural & Archaeological
Resources

This memo will serve to document our November 24, 1995 meeting regarding possible archaeological or cultural resource impacts associated with the above-referenced project.

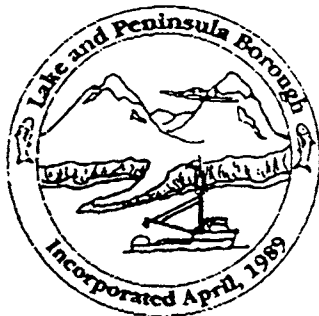
As we discussed, the proposed project between Iliamna and the Newhalen River would not deviate from the existing roadway prism and, therefore, would not impact resources in the area. From the Newhalen River north to the existing material site west of Nondalton, a survey will be performed next spring to determine the presence of cultural or archaeological sites which may be located within the project area. Upon completion of the survey, a determination will be made as to potential impacts from the proposed construction.

The portion of existing road between the material site and the City of Nondalton will be resurfaced only, therefore, no survey will be required.

We will continue to coordinate our efforts in impact evaluation with your office. If you have any questions, please contact me.

/DB

cc: John Dickenson, P.E., Engineering Manager
Susan Wick, Environmental Team Leader



Lake and Peninsula Borough

P.O. Box 495
King Salmon, Alaska 99613

Telephone: (907) 246-3421
Fax: (907) 246-6602



October 26, 1995

Ms. Susan Wick
Environmental Team Leader
ADOT/PF-Central Region
4111 Aviation Ave.
P.O. Box 196900
Anchorage, AK. 99519-6900

RE: Iliamna-Nondalton Rd.
Project No. 51951
Environmental Scoping Comments

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.	/	/
Project Mgr.	/	/
Survey Mgr.	/	/
Env. Leader	SW	/
Staff	AB	/
Project File	/	/
Central File	/	/

51951

Dear Ms. Wick:

I am writing in response to your letter dated September 28, 1995 in which you requested environmental scoping comments on the project referenced above. As you may know, the Lake and Peninsula Borough very strongly supports this project. It has been the Borough's number 1 or 2 transportation priority for the past five years. The Borough believes that there are tremendous social and economic benefits associated with this project and we have described those benefits in other correspondences with DOT/PF. We concur with DOT/PF's expectation that the adverse environmental impacts associated with the project will be minimal and we support the decision to seek a categorical exclusion.

The Borough believes that the majority of the environmental impacts associated with this project will be positive. In other words, we believe that this project will result in better environmental quality near the road corridor. For example, doing things such as resurfacing, replacing culverts, stabilizing banks, and fixing various drainage problems along the existing road will result in better water quality and fish habitat in adjacent lakes and streams. Local residents will no longer have to make wider and wider passes in their vehicles around muddy areas in the road; a practice which results in a wider than necessary road "footprint" and unnecessary damage to the tundra. Finally, a bridge over the Newhalen River will mean that it will no longer be necessary to drive heavy equipment and other vehicles across the river.

At the bottom of Page 2 of your letter, you requested information pertaining to three specific questions. Following is the Borough's response to each.

1. There are no existing or proposed zoning requirements that we are aware of. By the time this project is actually under construction however, it will be subject to the Borough's new coastal management plan. The plan is currently at the Concept Approved Draft Stage and is scheduled to be considered by the Coastal Policy Council sometime this winter. All land within the Borough except for volcanoes and icefields will be included in the coastal zone under this plan. Parts of this project may be in the coastal zone for the existing Bristol Bay Coastal Management Plan.

A Development Permit will be required from the Borough before construction actually commences. However, we see this as mainly a formality since this is already a project the Borough is very familiar with and it seems clear to us that DOT/PF intends to obtain the necessary permits and authorizations prior to construction.

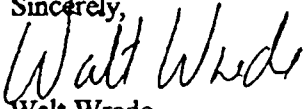
Most of the land along the road corridor is owned by local Native Corporations. We are aware that the Kijik Corporation does have some land use controls in place. We are also aware that the Iliamna Village Corporation is talking about land use controls on the lands around the proposed Tazimina Hydro Project and the access road to it (A road that would intersect with the Iliamna-Nondalton Road. We would strongly recommend that you consult with the affected Native Corporations.

2. The only local improvement of great significance that we are aware of is the proposed Tazimina Hydroelectric Project; a project that is closely tied to the completion of the Iliamna Nondalton Road. We would suggest that you contact Brent Petrie, Iliamna-Newhalen-Nondalton Electric Cooperative for information on this project. Information can also be obtained from Mark Dalton at HDR Engineering.

3. There is strong support for this project. The City of Newhalen, the City of Nondalton, the Village of Iliamna, and the Lake and Peninsula Borough have all passed resolutions in support of the project and I believe they are on file at DOT/PF. As far as we know, there is also strong support from the local Village Corporations and Village Councils.

The Lake and Peninsula Borough appreciates the opportunity to comment on the Iliamna-Nondalton Road project. Please do not hesitate to contact us if you have any questions or require additional information.

Sincerely,



Walt Wrede

Borough Manager

c.

Iliamna Village Council

City of Newhalen

City of Nondalton



Reply to:

4155 Tudor Centre Drive
Suite #104
Anchorage, Alaska 99508

RECEIVED

OCT 26 '95

Telephone:
Fax:
Toll free from within Alaska:

(907) 561-4487	
(907) 982-0945	
(800) 478-4487	
Section	COPY
Eng. Engr.	
Survey Mgr.	
Env. Leader	SW /
Staff	DB /
Project File	/
Central File	/

August 14, 1995

John D. Horn, P.E.
Regional Director
State of Alaska
Department Of Transportation and
Public Facilities
P.O. Box 196900
Anchorage, Alaska 99519-6900

Dear Mr. Horn:

Kijik Corporation is the ANCSA village corporation for Nondalton. Kijik Corporation would like to reaffirm its support for the bridge across the Newhalen River near Nondalton to connect Nondalton and Iliamna. The bridge is important for two primary reasons:

1. Safety

The lack of a bridge has resulted in most people using the INN electrical easement down to Six Mile lake and taking a boat over to Nondalton. This has resulted in erosion where the electrical line is buried. Efforts to block access to the easement have been only marginally successful. Death or serious injury by electrocution is a real concern.

2. Economic benefits

The bridge will significantly lower the cost of transporting goods, services and people between Nondalton and the Iliamna area.

Please let me if there is anything Kijik Corporation can do to assist you on the Nondalton bridge project.

Sincerely,

Gregory F. O'Keefe

Gregory F. O'Keefe
CEO

*The same applies for
the road on either
side of the bridge*

Gregory F. O'Keefe

10-26-95

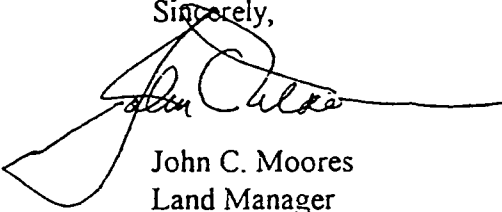
Via Fax

Susan Wick
Page 2

Please provide BBNC with the plans and specifications for the above project as soon as they are available.

We applaud your efforts and look forward to the project's completion.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Moores", with a long horizontal flourish extending to the right. The signature is written over the printed name and title.

John C. Moores
Land Manager

cc: Tom Greene, City of Nondalton Mayor
James Lamont, City of Newhalen Mayor
Harvey Anelon, Iliamna Village Council President



RESOLUTION 1995-01

A RESOLUTION OF THE ILIAMNA-NEWHALEN-NONDALTON ELECTRIC COOPERATIVE REQUESTING COMPLETION OF THE ROAD AND BRIDGE BETWEEN ILIAMNA- NEWHALEN AND NONDALTON.

WHEREAS in the mid-1980's the State of Alaska funded road improvements between Iliamna and Nondalton: and

WHEREAS that project stopped short of installing a bridge across the Newhalen River: and

WHEREAS vehicle and equipment traffic, in order to complete trips between Iliamna and Nondalton, now drives off the end of the completed road and onto a buried electric line easement owned by INN Electric: and

WHEREAS the electric line easement was never meant to be used as a road by heavy traffic and such traffic has greatly eroded the protective covering over the cooperative's buried power lines; and

WHEREAS traffic diverting off the partially completed road also trespasses on private land in the vicinity of Fish Camp on Six Mile Lake;

NOW THEREFOR BE IT RESOLVED that in order avoid public safety and nuisance problems that the State of Alaska , through its Department of Transportation and Public Facilities, fund and implement the completion of the bridge and road between Iliamna and Nondalton: and

BE IT FURTHER RESOLVED that the INNEC Board of Directors believes that completion of the road and bridge will also have a positive impact on the local economy by encouraging commerce between the three villages of Iliamna, Newhalen and Nondalton, consolidation of public facilities, and better tourism access to the Lake Clark/Lake Iliamna Region.

PASSED AND APPROVED BY THE BOARD OF DIRECTORS ON JANUARY 26, 1995

YEAS 7
NAYS 0

IN WITNESS THERETO:

By: *Thomas Hedlund*
Thomas Hedlund, President

Attest:

Edna Foss
Edna Foss, Secretary



RECEIVED

OCT 25 '95

October 18, 1995

Ms. Susan Wick
 Environmental Team Leader
 State of Alaska
 Department of Transportation and Public Facilities
 Preliminary Design and Environmental Section
 P.O. Box 196900
 Anchorage, AK 99519-6900

	COPY	ACTION
Prelim Design		
Environmental Section		
State Engr		
John Mogg		
Jim Gauder	SP	✓
	DB	✓
Project File		✓
Central File		✓

Subject: Iliamna to Nondalton Road, ADOT&PF Project No. 51951
 Scoping comments

Dear Ms. Wick:

The Iliamna-Newhalen-Nondalton Electric Cooperative (INNEC) appreciates the opportunity to provide comment concerning the proposed upgrade of the Iliamna to Nondalton Road. The road serves as a vital connection between the communities of Newhalen and Iliamna on the south with Nondalton on the north. In its present condition, especially in the spring during breakup, the road is virtually impassable. Upgrade of the road would improve this important inter-community transportation link, providing benefits to the entire region. The road project meshes well with a proposed hydroelectric facility that INNEC is pursuing.

INNEC provides electric power to all three communities. Our transmission line runs from the diesel plant in Newhalen adjacent to the existing Iliamna to Nondalton Road to a point where it diverges to the north to Fish Village, at which point it crosses Six Mile Lake to Nondalton. During the past few years a tremendous amount of vehicular traffic has been crossing the transmission line easement to access Fish Village, despite our good faith and persistent efforts to block access. INNEC is extremely concerned about this situation as it poses a direct threat to the integrity of our transmission line. A broken underground line in this area would interrupt power to Nondalton until it could be repaired. As you can see, upgrade of the road and construction of the bridge crossing of the Newhalen River will resolve this serious public safety issue.

INNEC will also benefit from improved access between the diesel power plant in Newhalen and Nondalton. Several times a year we perform both routine and unscheduled maintenance of our facilities in Nondalton. Maintenance personnel, tools and hardware

must be sent by plane and the value of power poles in Nondalton is nearly twice that in Iliamna due to the need to handle them several times by truck and watercraft during transport. The lack of direct overland access significantly restricts our ability to maintain our system and increases electric utility costs. A road connection will facilitate our efforts to provide electric power and reliable maintenance to all cooperative members.

INNEC is currently pursuing development of a hydroelectric project at the Tazimina Falls. The project site is located approximately seven road miles east of milepost 9.0 on the Iliamna to Nondalton Road. We anticipate startup of general construction activities early in the summer of 1996. Access to and from the project site, both during construction and once the project is operational, will require multiple vehicular trips each day. If construction of the Iliamna to Nondalton Road is anticipated during the time that we are constructing the hydroelectric project, coordination of contractor activity will be important. After the hydroelectric project is operational, we will require daily access to the hydroelectric facility for maintenance purposes. Depending on the timing of construction, work on the Iliamna to Nondalton Road should be planned to minimize access conflicts during construction of the hydroelectric facility.

INNEC strongly supports the upgrade of the existing road because of the benefits it will provide not only to the electric consumers of the region but also for the overall development of this area. The airport at Nondalton is often difficult to access and its runway is so short that larger freight-hauling aircraft cannot land there. An overland link from the barge and airport facilities at Iliamna to Nondalton will allow for greater economical movement of people and freight most of the year. A road link would allow for the safe transport of people in and out of the region. The potential to share facilities among the different communities, such as airports, landfills, clinics, and schools, will enhance the ability of local and regional governments to provide services economically and efficiently.

The INNEC Board of Directors passed a resolution in support of the completion of the of the road connecting Iliamna and Newhalen with Nondalton in January of this year. A copy of that resolution is attached for your review.

Please give me a call if I can be of further assistance.

Sincerely,



Brent N. Petrie
General Manager

Attachment

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
CENTRAL REGION - DESIGN & CONSTRUCTION
HIGHWAY DESIGN

TELEPHONE RECORD

DATE: November 1995
FROM: Mary Gerkin
REPRESENTING: Iliaska Lodge
SUBJECT: River Access
PROJECT: Iliamna - Nondalton
PRESENT:

TIME: _____
PHONE: 571-1221 Iliamna
337-9844 (Anchorage)

NOTED BY: Hank Wilson

HW

Mary Gerkin called to discuss subject project, which she supports. Expressed interest in continued river access at (presently) heavily used boat launching/landing area.

Advised that it appeared to be beneficial to continue to serve public access to river for recreation and or commerce. We will investigate upgrading as part of subject project. Advised Ms. Gerkin to send in letter so her concern will be documented.

HW:aav

RECEIVED

NOV 16 '95

Prelim. Design & Environmental Section	ACTION
PD&E Engr.	COPY
Project Mgr. <i>H.W. Wilson</i>	
Locations	
Env. Team <i>Galbraith</i>	
Staff <i>DS</i>	
Project File	
Central File	

A51951

November 8, 1995

Mr. Hank Wilson, P.E.
 Chief of Highway Design
 ADOT&PF
 PO Box 19600
 Anchorage, AK 99519

Dear Mr. Wilson:

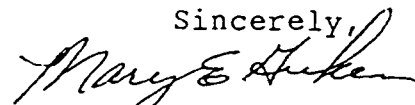
I have spoken on the phone with you regarding my concern with the Iliamna-Nondalton road. The original road built in the 1970's followed the Newhalen River up to the landing area and/or the portage. From there the Lake Clark and Nondalton people would haul fuel and groceries to their homes via skiff or barge. Alexie Creek also drains into the Newhalen at that point. There is a one acre campsite designated by the BLM located in that spot. As you might guess this is a popular spot for fishing and other activities.

The "old" road has not been maintained and is hard to drive. During the 80's when the "new" road was being built, there was a "spur" road built that conveniently provided access down to the portage, using the old road for a short portion. The spur road can't be more than 500 yards long but has provided very needed access.

When you design the roadway rehabilitation will you please include the spur road as part of the whole project? Please incorporate it as belonging to the State of Alaska. It was built with State money and has historically been used by everyone. It will continue to be an integral, important access point to the Newhalen River even when the road is completed to Nondalton.

Thank you for your consideration on this matter.

Sincerely,



Mary E. Gerken
 Iliaska Lodge, Inc.

Iliaska Lodge
 Inc.

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
CENTRAL REGION - DESIGN & CONSTRUCTION
PRELIMINARY DESIGN & ENVIRONMENTAL SECTION

TELEPHONE RECORD

DATE December 6, 1995 TIME 2:25 p.m.
TO Tom Greene, City Manager PHONE 294-2235
REPRESENTING City of Nondalton LOCATION Nondalton
FROM Debbie Bertossa, ADOT&PF
PROJECT Iliamna to Nondalton Road Reconstruction
PROJECT NO. 51951
SUBJECT Agency Scoping Comments

I had contacted Tom to ask for comments regarding the proposed project to reconstruct a road from Iliamna to Nondalton and build a bridge across the Newhalen River. He stated that there was no question that the entire community wants the road upgraded and the bridge constructed. It is a vital link for the survival and livelihood of people in the area. Although he hadn't seen any plans for the project, he is concerned that the design of the bridge not impede navigation on the river. I told him that currently the preliminary bridge design would have four piers in the water and the Department would be obtaining a permit from the U.S. Coast Guard prior to construction of the bridge.

We discussed the types of boats used at this portion of the river. He stated that use is primarily limited to boats 18 to 22 feet in length. The river is very rough between Six Mile Lake and Iliamna, therefore, only a few jet boats travel the entire length. A small barge approximately 20 feet long and 12 feet tall will occasionally pass by the bridge site on the way to the "Landing" located just south of Six Mile Lake to load cargo carried by vehicle from Iliamna and transport it to Nondalton. This will not be necessary when the bridge is constructed since cargo will be hauled by road after the project is completed.

cc: John Dickenson, P.E., Engineering Manager, Aviation Design
 Susan Wick, Environmental Team Leader, PD&E

working with the communities as they have been, to insure that proper design is meet to insure no changes are made that would significantly alter the project.

The City Council has also reviewed the "Statewide Transportation Improvement Program 1996 - 1998 which was released by your office this month. It gave us great disappointment to see that the funding level set forth by the draft "Transportation Needs and Priorities in Alaska" that was put out in November of 1995 for public review, was decreased by \$4 million dollars (\$4,000,000.00).

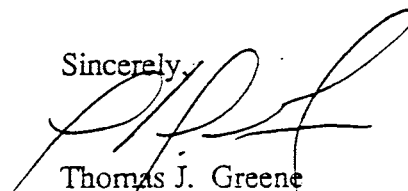
The community of Nondalton feels that enough is enough. Lives will be saved! access to major medical facilities will improve! personal and real properties will be better protected! social and economical goals will be strengthened. The Iliamna/Nondalton road and bridge project is a #1 priority by the communities of Nondalton, Iliamna and Newhalen! it is the #1 priority of the Lake and Peninsula Borough, it is a #1 priority of the State of Alaska, Construction began over 12 years ago on this project. Its time for closure

The city council strongly urges DOT/PF to continue forward on this project. We have committed our efforts and support overwhelmingly to insure the completion of this project by working with the DOT/PF. We feel that DOT/PF well be taking a major step backwards going into the 21st. century of Statewide Transportation Needs of this State by not continuing forward on its own goals and objective's. Please!! Lets move forward, not backwards.

A recent survey of community members over the age of 21 years showed continuing support for the completion of the road and bridge. The survey concluded that 47 people were for the project, 18 people were against the project and 16 people were undecided.

If my office can be any further assistance to you in anyway. Please, do not hesitate to call me.

Sincerely,



Thomas J. Greene
Mayor

cc: John Horn, P.E.
Regional Director/Central Region
Nondalton Tribal Council
Harvey Anelon, Iliamna Tribal Council
Mayor Jim Lamont, City of Newhalen
Mayor Glen Alsworth, L&P Borough
Shelia Bergy, Community Development Coordinator
Lake & Peninsula Borough
Senator Lyman Hoffman
Representative Carl Moses



RECEIVED

JUL 5 '96

DIRECTOR'S OFFICE
D&C - CENTRAL REGION

DIRECTOR	
CHIEF/DESIGN	X
Aviation	
Highways	
Materials	
PD&E	
Traffic/Util	
CHIEF/CONSTRUCTION	
Aviation	
Highways	
CHIEF/RIGHT-OF-WAY	
CHIEF/PROJECT CTL	
CHIEF/EGR OPS&PUB FAC	
REGIONAL DIRECTOR	
File	

June 27, 1996

John D. Horn, P.E.
Regional Director
State of Alaska
Department of Transportation and
Public Facilities
P.O. Box 196900
Anchorage, Alaska 99519-6900

Dear Mr. Horn:

Kijik Corporation (Kijik) is the ANCSA village corporation for Nondalton. Kijik's ANCSA entitlement is 126,570 acres. Kijik has received patent to 88,312 acres and interim conveyance to 29,336 acres. As the largest land owner in the Nondalton area, Kijik would like to reaffirm its support for the bridge across the Newhalen River near Nondalton and the road to connect Nondalton and Iliamna. As previously discussed in our August 14, 1995 letter, the bridge and road are important for safety and economic reasons.

There is strong support for the road and bridge project in Nondalton. It is also our understanding that both the Nondalton Tribal Council and the City of Nondalton support the road and bridge project.

The benefits of the bridge far exceed any real or imagined negative impacts. Kijik believes that the safety and economic well being of the people of Nondalton is more important than the theoretical concerns some recreational fishermen have expressed that the bridge will increase pressure on their favorite fishing spot.

Sincerely,

Eleanor M. C-Johnson
Eleanor M. C-Johnson
President and Chairman of the Board

cc: Board of Directors

Reply to:

4155 Tudor Centre Drive
Suite #104
Anchorage, Alaska 99508

Telephone: (907) 561-4487
Fax: (907) 562-4945
Toll free from within Alaska: (800) 476-4487

D+C

RECEIVED

JUL 1 '96

*Dave - draft reply
KATH. J. H. N. S.
DRAFT A REPLY...
KEY OFF OUR RECENT
LETTER TO MAYOR GRAY.
DAVE*

REGIONAL DIRECTOR	COPY	ACTION
Design & Const.		✓
Maint. & Oper.		
Admin Svcs.		
Planning		
ALA		
ALA		
Construction		
Dep. Comm. Oper.		
Dep. Comm. Budget		
M. Holland		
D. Broderick		

RECEIVED

JUL 08 '96

JUL - 5 '96

Preconstruction Engineer
Central Region

	Copy	Act
Aviation		
Highway		
Materials		
PD&E		
Traffic/Utilities		

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		✓
Project Mgr.		
Survey Mgr.		
Env. Leader	SU 1	
Staff	HL 2	
Project File		X

*A-42
Dave 7/12*

RECEIVED

Iliamna Village Council

Box 286
Iliamna, Alaska 99606
907-571-1246
Fax: 907-571-1256

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr.		<i>Dickinson</i>
Locations		
Env. Team		<i>Lead</i>
Staff		<i>PL</i>
Project File		<i>/</i>
Central File		<i>/</i>

51957

September 20, 1996

Department of Transportation & Public Facilities
State of Alaska
4111 Aviation Avenue
P.O. Box 196900
Anchorage, Alaska 99519-6900

RE: Letter of Support for Iliamna-Nondalton Intertie Road

Dear Ms. Lons;

The Iliamna Village Council would like to express our support for the road completion to Nondalton with the bridge. The Iliamna Village Council would like to explain that this road completion would open up many benefits for all the residents of Iliamna, Newhalen, & Nondalton not only in access for the three communities since they are already connected with rural electricity. The examples that I can honestly say would be the Store, fuel, freight, community gatherings, etc. This would also enable us better ambulance service and a possibility of a larger High School with vocational training.

The Iliamna Village Council has always stated their support to complete the road to Nondalton as a number one priority. The Iliamna Village Council feels that the individuals that are complaining do not live here year around and we feel that this conservation group should stay out of the local village politics. The residents of Iliamna has asked the State of Alaska to complete the road since it was first funded and we are asking again that this be done. The funding has been allocated and we would like to see it be used for that specific purpose.

The Iliamna Village Council is also in support of the Iliamna Airport Crosswind Runway Extension, re: Project No. 52260.

If you have any questions please call 907-571-1246 and ask for Gerald Anclon Sr., Village Administrator.

Sincerely,



Gerald Anclon
Village Administrator

gja

cc: Governor Tony Knowles
Senator Lymon Hoffman
Representative Karl Moses

Newhalen Tribal Council
P.O. Box 207
Iliamna, Alaska 99606
Phone (907) 571-1410

RECEIVED

OCT 15 '96

October 3, 1996

Department of Transportation and Public Facilities
Division of Design and Construction
Preliminary Design & Environmental
4111 Aviation Avenue
Anchorage, Alaska 99519-6900

Re: Support letter

Dear Ms. Wick;

Newhalen Tribal Council is in favor of the road project from Iliamna to Nondalton. The environmental impact is very minimal to the villages and the social impact of the road project would make life and traveling easier for the 3 villages.

Newhalen Tribal Council would really appreciate it greatly if this project would get completed very soon. Thank you very much for your time.

Sincerely,
Ronald Wassillie
Ronald Wassillie
President

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr.		
Locations		
Env. Team Leader		
Staff		
Project File		
Central File		

FILED 10/7

PETITION

We, the undersigned residents of the communities of Iliamna, Newhalen and Nondalton, wish to go on record in support of completion of the road and bridge project to Nondalton. We support the State of Alaska Department of Transportation and Public Facility efforts to plan, design and construct this project as soon as possible. We believe this project will have a beneficial environmental and economic impact on all three communities by improving: health care and emergency medical evacuation; transportation for food, fuel, and materials; consolidation of solid waste management; improving the efficiency of school operations; and improving environmental conditions by reducing erosion and siltation along the road and river.

<u>NAME</u>	<u>ADDRESS</u>
<u>Attn. Susan Wick</u>	
<u>Tina Wallillie</u>	<u>Box 53 Iliamna AK 99606</u>
<u>Chazina M. Oza</u>	<u>Box 267 Iliamna AK 99606</u>
<u>Jerrek Anelon</u>	<u>Box 305 Iliamna AK 99606</u>
<u>Sarah Armstrong</u>	<u>BOX 9 ILLIAMNA AK 99606</u>
<u>Hiedi LaPate</u>	<u>PO. BOX 109 ILLIAMNA AK 99606</u>
<u>Michael Adams</u>	<u>Box 97 Iliamna AK 99606</u>
<u>Michael Danks</u>	<u>Box 285 Iliamna AK 99606</u>
<u>Marie Wallillie</u>	<u>Box 84 Iliamna AK 99606</u>
<u>Marian Wallillie</u>	<u>Box 41 Iliamna AK 99606</u>
<u>Bernadette A. Paine</u>	<u>P.O. Box 171 Iliamna AK 99606</u>
<u>Jusid Askoak</u>	<u>P.O. Box 225 Iliamna AK 99606</u>
<u>Peter Rycharovsky</u>	<u>P.O. Box 114 Iliamna AK 99606</u>
<u>Garrette Anelon</u>	<u>P.O. Box 125 Iliamna AK 99606</u>
<u>Kay Wallillie</u>	<u>P.O. Box 53 Newhalen AK 99606</u>
<u>Ricco Joseph</u>	<u>P.O. Box 121 Newhalen AK 99606</u>
<u>Chasity Anelon</u>	<u>P.O. Box 305 Iliamna AK 99606</u>
<u>Denise Nickoli</u>	<u>P.O. Box 21 Iliamna, Alaska 99606</u>
<u>Janelle Judwick</u>	<u>P.O. Box 73 Iliamna AK 99606</u>
<u>Tamara Hedlund</u>	<u>P.O. Box 186 Iliamna AK 99606</u>
<u>Jake Armstrong</u>	<u>P.O. Box 9 Iliamna AK 99606</u>

PETITION

We, the undersigned residents of the communities of Iliamna, Newhalen and Nondalton, wish to go on record in support of completion of the road and bridge project to Nondalton. We support the State of Alaska Department of Transportation and Public Facility efforts to plan, design and construct this project as soon as possible. We believe this project will have a beneficial environmental and economic impact on all three communities by improving: health care and emergency medical evacuation; transportation for food, fuel, and materials; consolidation of solid waste management; improving the efficiency of school operations; and improving environmental conditions by reducing erosion and siltation along the road and river.

NAME

ADDRESS

Madys M. Ashok Box 225, Newhalen AK 99606
~~Samuel R. Lemont, Box 52 Iliamna AK 99606~~
~~Daanuc Wassell, Box 53 Iliamna Newhalen AK 99606~~
~~Raymond Wassell, Box 53 Newhalen AK 99606~~
~~John Wassell, Box 11 Newhalen AK 99606~~
~~Carl K. Balluta Box 117 Iliamna AK 99606~~
~~Carl E. Balluta Box 142 Iliamna AK 99606~~
~~Wasio W. Balluta Newhalen/Iliamna 99606~~
~~Fedoris Balluta Newhalen/Iliamna 99606~~
~~Henry Kuehn Newhalen AK 99606~~
~~Nicolas Kuehn Box 9 Iliamna AK 99606~~
~~Dan Oymur Box 116 Iliamna AK 99606~~
~~Edward St. Lawrence Co. Del. Port Alsworth AK 99653-9999~~
~~Nytha Anselm Box 248 Iliamna AK 99606~~
~~John Saccaro Box 144 Iliamna AK 99606~~
~~Joseph B. Anselm Box 167 Iliamna AK 99606~~
~~Jim J. Anselm P.O. Box 167 Iliamna AK 99606~~
~~Freda J. Olup P.O. Box 205 Iliamna AK 99606~~
~~Jane J. Anselm Box 86 Iliamna AK 99606~~
~~John J. Anselm Box 86 Iliamna AK 99606~~

PETITION

We, the undersigned residents of the communities of Iliamna, Newhalen and Nondalton, wish to go on record in support of completion of the road and bridge project to Nondalton. We support the State of Alaska Department of Transportation and Public Facility efforts to plan, design and construct this project as soon as possible. We believe this project will have a beneficial environmental and economic impact on all three communities by improving: health care and emergency medical evacuation; transportation for food, fuel, and materials; consolidation of solid waste management; improving the efficiency of school operations; and improving environmental conditions by reducing erosion and siltation along the road and river.

NAMEADDRESS

~~Peter J. Aulan P.O. Box 62 Newhalen AK 99606~~
~~Evelyn Lumint P.O. Box 62 Newhalen AK 99606~~
~~Jack Paul P.O. Box 16 Newhalen AK 99606~~
~~Ann Shurt Box 16 Iliamna AK 99606~~
~~Betty Iretikoff Box 121 Iliamna AK 99606~~
~~Mikhail Washey 80 Bar 32 Newhalen AK 99606~~
~~Agapius Washey 80 Bar 32 Newhalen AK 99606~~
~~Cecil Olympia Box 130 Newhalen AK 99606~~
~~Katie Olympia Box 63 Newhalen AK 99606~~
~~Andrew Balluta Box 21 Newhalen AK 99606~~
~~Christina Melaguet P.O. Box 83 Newhalen AK 99606~~
~~Darlene G. Melaguet P.O. Box 43 Newhalen AK 99606~~
~~Arnellina Arnellina P.O. Box 33 Newhalen AK 99606~~
~~Sava Anolon Box 188 Newhalen AK 99606~~
~~Mary Anolon-Gray Box 188 Newhalen AK 99606~~
~~Denise Anolon Box 57 Newhalen AK 99606~~
~~Zack Anolon Box 57 Newhalen AK 99606~~
~~Waltie X. Mindle Box 15 Newhalen AK 99606~~
~~Katie W. Olympia Newhalen AK 99606~~
~~Gabriel K. Olympia Newhalen AK 99606~~

PETITION

We, the undersigned residents of the communities of Iliamna, Newhalen and Nondalton, wish to go on record in support of completion of the road and bridge project to Nondalton. We support the State of Alaska Department of Transportation and Public Facility efforts to plan, design and construct this project as soon as possible. We believe this project will have a beneficial environmental and economic impact on all three communities by improving: health care and emergency medical evacuation; transportation for food, fuel, and materials; consolidation of solid waste management; improving the efficiency of school operations; and improving environmental conditions by reducing erosion and siltation along the road and river.

NAME

ADDRESS

- Bob Aue P.O. Box 267 Iliamna, AK. 99606
- Dawn Gustafson Box 43 Nondalton AK 99640
- Shirley D. Perry
- David R. Throumbe P.O. Box 91763 Anchorage AK 99509
- Jennifer Holman " " " "
- Henry Walter P.O. Box 033 Nondalton AK 99640
- Pauline A. Holman P.O. Box 033 Nondalton AK 99640
- Youn & Alecia PO Box 104 Nondalton AK 99640
- Virginia Pollett PO Box 052 Nondalton AK 99640
- Michelle Lyne PO Box 062 Nondalton AK 99640
- Agnes M. Cusma Box 105 Nondalton AK 99640
- Elaine Aaberg Box 87 Nondalton, AK 99640
- Dorlene Mann Box 116 " "
- Steve E. Kallenda Box 53 Nondalton, AK 99640
- Christ Stegall Box 53 NONDALTON AK 99640
- James J. Lutz Box 005 Nondalton AK 99640
- Lina Sue Carlisle - PO. Box 035 Nondalton AK 99640
- Charles M.C. Rogan - PO Box 035 Nondalton. AK. 99640
- Nick Carstiff SR
- Trish Pollitt Nondalton AK 99640

PETITION

We, the undersigned residents of the communities of Iliamna, Newhalen and Nondalton, wish to go on record in support of completion of the road and bridge project to Nondalton. We support the State of Alaska Department of Transportation and Public Facility efforts to plan, design and construct this project as soon as possible. We believe this project will have a beneficial environmental and economic impact on all three communities by improving: health care and emergency medical evacuation; transportation for food, fuel, and materials; consolidation of solid waste management; improving the efficiency of school operations; and improving environmental conditions by reducing erosion and siltation along the road and river.

NAME

ADDRESS

<u>Barbara E. Willes</u>	<u>P.O. Box 74 NONDALTON</u>
<u>Wm Robert</u>	<u>P.O. Box 186 Iliamna AK</u>
<u>Alice Hedlund</u>	<u>P.O. Box 186 Iliamna, AK</u>
<u>Brent M. Pedersen</u>	<u>P.O. Box 186 Iliamna, AK</u>
<u>John W Johnson</u>	<u>P.O. Box 61 Iliamna, AK 99606</u>
<u>Massimo Balluta Jr.</u>	<u>Box 170 Iliamna AK 99606</u>
<u>Clarence M. Balluta</u>	<u>Box 170 Ili. AK 99606</u>
<u>Michael</u>	<u>Box 73 Ili AK 99606</u>
<u>Gregory Andrew S</u>	<u>Box 4. Ili. AK 99606</u>
<u>Rolla Weber</u>	<u>P.O. Box 89 Iliamna, AK 99606</u>
<u>Paul Macmillan</u>	<u>P.O. Box 266 Newhalen AK 99606</u>

PETITION

We, the undersigned residents of the communities of Iliamna, Newhalen and Nondalton, wish to go on record in support of completion of the road and bridge project to Nondalton. We support the State of Alaska Department of Transportation and Public Facility efforts to plan, design and construct this project as soon as possible. We believe this project will have a beneficial environmental and economic impact on all three communities by improving: health care and emergency medical evacuation; transportation for food, fuel, and materials; consolidation of solid waste management; improving the efficiency of school operations; and improving environmental conditions by reducing erosion and siltation along the road and river.

NAME

ADDRESS

DAVID M PARKS SR BOX 285 Iliamna, AK 99606
 Anna Parks Box 275 Iliamna AK 99606
 Peter John P.O. Box 112 Iliamna AK 99606
 John Jay Tretikoff 14 Box 11 Newhalen AK 99606
 Rose Tretikoff P.O. Box 11 Newhalen AK 99606
 Agnes Buchnowski Box 114 Newhalen AK 99606
 Georgy Norberg Box 113 Iliamna AK 99606
 Funda Norberg Box 113 Iliamna AK 99606

PetitionNAMEADDRESS

Stephanie Trotter

P.O. Box 62 Iliamna AK, 99600

Jaslyn Horstberger

P.O. Box 113 Iliamna, AK 99606

Eric Wassilie

P.O. Box 53 Iliamna, AK 99606

Theodore Wassilie

P.O. Box 1 Iliamna, AK 99606

Catherine Wassilie

P.O. Box 41 Iliamna, AK 99606

Tatiana Oskook

P.O. Box 225 Iliamna, AK 99606

Kristy J. Lamont

P.O. Box 52 Iliamna, AK 99606

John Baschler

P.O. Box 110 Iliamna, AK 99606

Jason Anelon

P.O. Box 188 Iliamna, AK 99606

Nena Anelon

P.O. Box 2 Iliamna, AK 99606

Richard R. Beebe

P.O. Box 68 Iliamna, AK 99606

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

CENTRAL REGION - DIVISION OF DESIGN AND CONSTRUCTION
PRELIMINARY DESIGN & ENVIRONMENTAL

TONY KNOWLES, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
(FAX 243-6927 - TDD 266-1442)
(907) 266-1508

September 6, 1996

Re: Iliamna to Nondalton Road
Secondary & Cumulative Impacts Study
Project No. 51951

Bob Arce
L&PB Assembly
P.O. Box 158
Iliamna, AK 99606

Dear Mr. Arce:

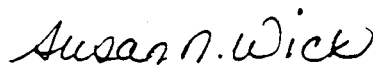
The Alaska Department of Transportation and Public Facilities (ADOT&PF) is pleased to announce completion of the draft report, "Secondary and Cumulative Impacts Study of the Proposed Iliamna to Nondalton Road Reconstruction". In response to requests from concerned citizens, we have completed this comprehensive evaluation of secondary and cumulative impacts associated with this project.

As you may have discussed with our contractor, Gordon Lewis of Community Planning, we are distributing copies to those who expressed an interest in reviewing this report. We appreciate any comments you would like to provide to enable us to fully examine project issues. You may fax your comments to (907) 243-6927, e-mail them to: Susan_Wick@dot.state.ak.us or mail them to:

Dept. of Transportation & Public Facilities
Preliminary Design and Environmental
ATTN: Susan Wick
P.O. Box 196900
Anchorage, AK 99519-6900

Comments must be received no later than 4:00 p.m. Monday, October 7, 1996. If you have any questions or require additional information, please contact Helen Lons, Environmental Analyst, at 266-1491.

Sincerely,



Susan N. Wick
Environmental Team Leader

Enclosure

cc: James A. Bryson, Right-of-Way/Environmental Engineer, FHWA
John Dickenson, P.E., Project Manager, ADOT&PF
Janet George, Regional Planning Manager, ADOT&PF
Steven R. Horn, P.E., Supervisor, PD&E, ADOT&PF
Helen Lons, Environmental Analyst, ADOT&PF

Bob Arce
L&PB Assembly
P.O. Box 158
Iliamna AK 99606

Brent Petrie
INNEC
Box 210
Iliamna AK 99606

Dennis Neidermeyer
P.O. Box 498
King Salmon AK 99613

Mayor Tom Green
City of Nondalton
P.O. Box 89
Nondalton, AK 99640

Bill Pierce
LCNPP
4230 University Drive, Suite 311
Anchorage AK 99508

Lee Fink
LCNPP
Port Alsworth AK 99653

Wassie Balluta
P.O. Box 170
Iliamna, AK 99606

Mayor Glen Alsworth
L+PB
Box 1
Port Alsworth AK 99653

Walt Wrede
L&PB
P.O. Box 495
King Salmon AK 99613

Wayne Dolezal
ADF&G
333 Raspberry Road
Anchorage, AK 99518-1599

Kelley Hepler
ADF&G
333 Raspberry Rd.
Anchorage AK 99518-1599

Mac Minard
ADF&G
P.O. Box 230
Dillingham, AK 99576

Dick Sellers
ADF&G
P.O. Box 37
King Salmon, AK 99613

Larry Vandale
ADF&G
P.O. Box 1030
Dillingham, AK 99576

Pippa Coliey
ADF&G
P.O.Box 1030
Dillingham, AK 99576

Jeff Regnart
ADF&G
333 Raspberry Rd.
Anchorage, AK 99518-1599

Greg O'Keef
Kijik Corp.
4155 Tudor Ctr. Drive, Ste. 104
Anchorage, AK 99508

Eleanor M.C - Johnson
Kijik Corp.
4155 Tudor Ctr. Drive, Ste. 104
Anchorage, AK 99508

John Adcox
P.O. Box 187
Iliamna, AK 99606

Harvey Anelon
P.O. Box 286
Iliamna, AK 99606

Myrtle Anelon
Iliamna Native Ltd.
P.O. Box 248
Iliamna, AK 99606

Sue Arce
General Delivery
Iliamna, AK 99606

Mayor Jim Lamont
City of Newhalen
Newhalen, AK 99606

Ronald Wassillie
Newhalen Tribal Council
Newhalen, AK 99606

Tim LaPorte
Iliamna Air Taxi
General Delivery
Iliamna, AK 99606

Debby Tennison
DCRA
P.O. Box 790
Dillingham, AK 99576

Jeff Parker
Richard A. Jameson & Associates
500 "L" Street, Suite 502
Anchorage, AK 99502

Doug Baily
637 West 3rd Ave.
Anchorage, AK 99501

Phil Culter
Alaska Sportfishing Association
P.O. Box 24-1847
Anchorage, AK 99524-1847

Cliff Eames
Alaska Center for the Environment
519 West 8th Ave., Suite 201
Anchorage, AK 99501

John Moores
BBNC
P.O. Box 100220
Anchorage, AK 99510

Kirk D. Gay
Valhalla Lodge
P.O. Box 190583
Anchorage, AK 99519-0583

Carl Bullo
Alaska Wilderness Lodge
General Delivery
Port Alsworth, AK 99653

Bruce Johnson
Bristol Bay Sportfishing
P.O. Box 164
Iliamna, AK 99606

Copper River Lodge
P.O. Box 200831
Anchorage, AK 99520

Roger & Lula Cusack
Cusack's Alaska Lodge
P.O. Box 194
Iliamna, AK 99606

Ken Owsichuk
Fishing Limited Lodges
P.O. Box 190301
Anchorage, AK 99519

Jim Winchester
Iliamna Lake Resort
P.O. Box 208
Iliamna, AK 99606

Ted Gerken
Iliaska Lodge
P.O. Box 228
Iliamna, AK 99606

Brad or Sheryl Johnson
Lakeside Lodge
Port Alsworth, AK 99653

Tim and Nancy La Porte
Lake View Lodge
P.O. Box 109
Iliamna, AK 99606

Bill Sims
Newhalen Lodge
3851 Chingak Bay Dr.
Anchorage, AK

Mark Kneen
Point Adventure Lodge
P.O. Box 141
Iliamna, AK 99606

Craig Augustynovich
Rainbow King Lodge
P.O. Box 106
Iliamna, AK 99606

John Baechler
Red Quill Lodge
P.O. Box 49
Iliamna, AK 99606

Glen and Patty Alsworth
The Farm Lodge
Port Alsworth, AK 99653

Jim Forbes
135 Christiansen Drive
Suite 300
Anchorage, AK 99501

Mark Hickey
211 4th St.
Suite 108
Juneau, AK 99801

Gordon Lewis
Community Planning
3100 C Portage Bay Place East
Seattle, WA 98102

Ms. Marianne G. See
DEC
555 Cordova Street
Anchorage AK
99501

Mr. Lance Trasky
Dept. of Fish and Game
333 Raspberry Road
Anchorage AK 99518

Ms. Anne Rappoport
U.S. Fish and Wildlife Service
605 West 4th Ave. Room 62
Anchorage AK 99501

Mr. Ronald Morris
National Marine Fisheries Service
222 West 7th Avenue, #43
Anchorage AK 99513

Mr. Don Kohler
U.S. Army Corps of Engineers
P.O. Box 898
Anchorage AK 99506-0898

Mr. Ted Rockwell
U.S. Environmental Protection
Agency
222 West 7th Ave., #19 (Rm.537)
Anchorage AK 99513-7588

Ms. Judith Bittner
Office of History and Archaeology
3601 "C" Street, Suite 1278
Anchorage AK 99503-5921

John Johnson
Village of Iliamna
P.O. Box 286
Iliamna, AK 99606

Eleanor M. C-Johnson
Kijik Corp.
4155 Tudor Ctr. Drive, Ste 104
Anchorage, AK 99508

Sue Flensburg
Bristol Bay Coastal Resource
Service Area
P.O. Box 849
Dillingham, AK A-58

FAA
Airports Division
222 West 7th Avenue, #14
Anchorage, AK 99513



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 898
ANCHORAGE, ALASKA 99506-0898

OCTOBER 13 1996

RECEIVED

OCT 22 '96

Regulatory Branch
South Section
9-830477

Ms. Susan Wick
Alaska Department of Transportation
and Public Facilities
Post Office Box 196900
Anchorage, Alaska 99519-6900

Dear Ms. Wick:

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr. Dickson		
Locations		
Env. Team Leader		
Staff		
HL		
CS		
Wolfe		
Project File		
Central File		

51951

This is in response to your September 9, 1996, request for comments on your draft report entitled: "Secondary and Cumulative Impacts Study of the Proposed Iliamna to Nondalton Road Reconstruction", for your proposed road upgrade and extension project. The project includes the construction of a new crossing (bridge) over the Newhalen River, at section 1, T. 3 S., R. 33 W., Seward Meridian, at Nondalton, Alaska, USGS Quadrangle Maps Iliamna D-5 and D-6.

Your proposed project was reviewed pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors act of 1899. Section 10 requires that a DA permit be obtained for certain structures or work in or affecting navigable waters of the United States (U.S.), prior to conducting the work (33 U.S.C. 403). Section 404 requires that a DA permit be obtained for the placement or discharge of dredged and/or fill material into waters of the U.S., including wetlands, prior to conducting the work (33 U.S.C. 1344).

For regulatory purposes, the Corps of Engineers defines wetlands as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Navigable waters of the U.S. are those waters subject to the ebb and flow of the tide shoreward to the mean high water mark, and/or other waters identified as navigable by the Alaska District. The Newhalen River may be a navigable water of the U.S. as Lake Clark and Lake Iliamna are listed on our District Navigable Waters List. We are currently conducting a review of our records to determine the navigable status of Six Mile Lake, the Newhalen River, and the rest of this watershed.

Our project review included the information you furnished, our office records, and an on-site inspection with Ms. Helen Lons of your staff on October 4, 1996. The project area was assessed for wetlands, creek crossings, and the proposed bridge. It was determined that the proposed road upgrade portion from Iliamna to the Newhalen River would not impact wetlands. We were unable to inspect the Nondalton side of the river, where a new road will need

to be constructed, but the area looked similar to the Iliamna side, i.e., nonwetlands. The road crossings of the various creeks, where the road and culverts may be extended will require further authorization.

Any road repair and rehabilitation work necessary for the existing creek crossings to prevent further erosion, provided no additional fill material is placed into the creek beyond that of the original road construction, may be authorized by 33 CFR Part 330, Appendix A, Part B (3), the Nationwide Permit which authorizes maintenance of previously authorized, currently serviceable structures or fills. The road construction was originally authorized by DA permit 4-830477, Newhalen River 4, issued on February 2, 1984. The permit expired on October 26, 1986.

Design plans for the construction of the proposed bridge over the Newhalen River have not been finalized at this time. DA authorization pursuant to Section 404 will be required for any discharge of dredged or fill material below the ordinary high water line of the river and/or riverbed excavation for the placement of any piers or structures. Authorization may also be required under Section 10.

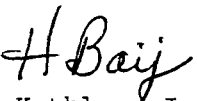
We reviewed your draft report on the *Secondary and Cumulative Impacts Study of the Proposed Iliamna to Nondalton Road Reconstruction* and have no comments at this time. It will be placed in the official file and we will include it in our environmental review after a Corps permit application is received.

Nothing in this letter shall be construed as excusing you from compliance with other Federal, State, or local statutes, ordinances, or regulations that may affect the proposed work. For informational purposes, a copy of this letter is being sent to the agencies on the enclosed list.

To determine your satisfaction with the evaluation of our permit applications and other requests, please complete the enclosed questionnaire. Our interest is to determine whether we need to improve our service and how that can best be accomplished. Your efforts and interest in evaluating our Regulatory Program are much appreciated.

We appreciate your cooperation with the Corps of Engineers' Regulatory Program. Please refer to file number 9-830477, Newhalen River 4, in future correspondence or if you have any questions concerning this matter. Please contact me at the above address, or by calling 753-2724, or by FAX at (907) 753-5567.

Sincerely,


Kathleen J. Kuna
Regulatory Specialist

Enclosure

STATE OF ALASKA

TONY KNOWLES, GOVERNOR
RECEIVED

OCT 04 '96

DEPT. OF ENVIRONMENTAL CONSERVATION

ANCHORAGE/WESTERN PUBLIC SERVICE AREA
555 CORDOVA STREET
ANCHORAGE, ALASKA 99501

Phone: (907) 269-7520
Fax: (907) 269-7506

	COPY	ACTION
Prelim. Design & Environmental Section PD&E Engr.		
Project Mgr		<i>Dickinson</i>
Locations		
Env. Team Leader		<i>HL</i>
Staff		
Project File		
Central File		

October 3, 1996

Ms. Susan Wick
Iliamna Airport Runway Extension
4111 Aviation Avenue
P.O. Box 19690
Anchorage, Alaska 99519-6900

SUBJECT: Iliamna to Nondalton Road Secondary & Cumulative Impact Study. Project # 51951 ADEC Project # 9725-WW-253-113

Dear Ms. Wick :

This letter is in response to the letter received in this office on September 9, 1996, concerning the completion of the draft report for the Iliamna to Nondalton Road Secondary & Cumulative Impact Study.

The Department has completed its review and has the following comments, concerns and recommendations.

1. In the event you encounter any evidence of contamination from leaking aboveground or underground fuel storage tanks or fuel lines in the area, you will need to contact this office, in accordance with Alaska Oil & Hazardous Substance Pollution Control Regulations (18 AAC 75.300 Discharge Reporting, Cleanup, and Disposal).
2. Water quality concerns: It appears the overall project size is larger than five acres, the conditions of the General NPDES Permit for stormwater control will need to be complied with. Stormwater and erosion control measures need to be incorporated into the design and construction work for the road systems and be addressed in the Corp. of Engineers permits. Please provide this office with a copy of the Notice Of Intent filed with the EPA regarding.
3. At this time there are no permitted solid waste landfill disposal sites at either Nondalton or Iliamna. Letters have been sent to the villages notifying them of the expiration.
4. All upgrades or improvements to any public drinking water system in the proposed roads improvement areas will require prior written approval of engineering plans which

October 3, 1996

must be submitted to this Department. As a reminder, all upgrades to the water systems in this area must meet the minimum separation distances, as specified by the State's Drinking Water Regulations 18 AAC 80.030.

5. The draft report discusses road improvements and the employment of local people to maintain the road, bridges and public accesses to the river. The report did not address equipment storage areas, sites or pads. DOT should consider facilities for the safe storage and handling of both new and used fuels such as waste oil, used anti-freeze and lubricating oils. If DOT intends to have fuel storage capabilities in the area, then spill prevention countermeasures plans should be incorporated into the design of this project.

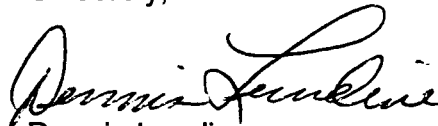
6. The draft report addresses air quality and dust control. The report did not specify if DOT intended to apply dust suppressants to the road surface. If the DOT intends to apply dust suppressants, a Surface Oil Permit Application will need to be applied for. Due to the proximity of road to surface water, this permit will most likely require CZM coordination.

7. In the event there is a consolidation of fuels or a fuel farm developed that has the capability to hold 420,000 gallons or more, a spill prevention plan will need to be submitted in accordance with AS 46.04.030.

This review does not imply the granting of any additional authorizations, nor obligate any state, federal, or local regulatory body to grant required authorizations.

Thank you for submitting the draft report to the Department. If you have any questions, please do not hesitate to contact me.

Sincerely,



Dennis Lundine
Environmental Specialist

DL/cf

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

HABITAT AND RESTORATION DIVISION

TONY KNOWLES, GOVERNOR

333 RASPBERRY ROAD
ANCHORAGE, AK 99518-1599
PHONE: (907) 344-0541
FAX: (907) 267-2464

RECEIVED

JAN 06 '97

MEMORANDUM

TO: Susan N. Wick
Environmental Leader
Central Region
Department of Transportation and Public Facilities

FROM: *AC*
Al Carson
Habitat Biologist
Region II
Habitat and Restoration Division
Department of Fish and Game

DATE: January 3, 1997

SUBJECT: ADF&G Review Comments on Iliamna to Nondalton Road
Impacts Study

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project Manager - Dickson	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Locations	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Env. Team Leader Staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
Project File	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Central File	<input checked="" type="checkbox"/>	<input type="checkbox"/>

51951

This is a response to your September 6, 1996 letter requesting Alaska Department of Fish and Game's (ADF&G) comments on the Iliamna to Nondalton Road Secondary and Cumulative Impacts Study Project No. 51951 dated September, 1996.

The following are our comments on the Impacts Study:

- The study says, "The key stumbling block to successful completion of the road is the bridge over the Newhalen River...". (see page 6, paragraph 2). The study does not disclose the costs or design issues which are a prerequisite for providing informed advice about bridge construction and cumulative effects of the proposed project.
- The key assumptions statements regarding secondary and cumulative impacts of the proposed project are confusing and not logical (see page 34, paragraph 1). For example, the last sentence of the first paragraph of the key assumptions section states, "The following assumptions are likely to occur with or without the road construction." (emphasis added). This

comment appears to be in direct conflict with both the first sentence of the same paragraph and the purpose of this report which on page 4 states, "The purpose of this report is to identify and evaluate the cumulative and secondary impacts likely to result from the reconstruction and completion of the road from Iliamna to Nondalton and the no-action alternative." The two statements in quotes lead the reviewer to conclude this report is unable to recognize cumulative and secondary impacts of the proposed project.

- We question the validity of the assertions made under the Environment paragraph on page 34. Specifically, the first sentence sounds like a wish or hope for the future rather than a description of how the proposed project would affect the environment over the next 20 years.
- On page 51 the report asserts, "The Iliamna-Nondalton Road reconstruction has no cumulative effect on the level of recreational use of the Newhalen River." The report does not provide the rationale or data to support with such a sweeping assertion as this. Experience with road expansion projects and other related facilities in previously undeveloped areas leads us to conclude that the Report finding is probably wrong. The ADF&G advises that the completion of the road will in fact have the cumulative effect of increasing the level of use of fish and wildlife resources in the Newhalen River and Lake Clark drainages.

Specifically, it is reasonable to expect as a minimum, the following cumulative impacts:

- Erosion from the road surface and shoulders of the road will likely cause long term sedimentation of fish bearing waters.
- An increase in the level of legal harvest and poaching of resident fish and wildlife can be expected immediately after the road is first opened. The higher levels of harvest adjacent to the road will continue until the local fish and wildlife populations are eliminated or move away because of increased harvest pressure.
- Salmon species which migrate up the Newhalen River are expected to see increased fishing pressure as a consequence of the increased access. We understand that completing this road has been a topic of discussion in local meetings convened to identify ways to increase tourism opportunities in this area. We find this forecast of increased recreational use much more compelling and likely than the "no cumulative effect" predictions made in the Report.

In conclusion, we disagree with the findings and many of the assumptions in the report. The ADF&G experience in reviewing and permitting road construction projects indicates there will be cumulative and secondary effects. The report does not accurately or adequately identify and address the likely cumulative and secondary impacts of the proposed project.

cc: R. Minard, ADF&G/SF
W. Dolezal, ADF&G/H&R
R. Sellers, ADF&G/WC
L. Van Daele, ADF&G/WC
J. Regnart, ADF&G/CFMD
S. Horn, ADOT&PF



MEMORANDUM

STATE OF ALASKA

Department of Transportation and Public Facilities
Central Region-Division of Design and Construction
Preliminary Design and Environmental

To: Al Carson
Habitat Biologist
Habitat and Restoration Division
Department of Fish & Game
Date: January 27, 1997
Phone: 266-1491
Fax: 243-6927

Thru: Susan N. Wick *SNW*
Environmental Team Leader
Project No.: 51951

From: Helen Lons *HL*
Environmental Analyst

Project: Iliamna - Nondalton Road
Reconstruction

Re: Secondary and Cumulative
Impacts Study

Thank you for your January 3, 1997 memo commenting on ADOT&PFs draft Secondary and Cumulative Impacts Study of the Proposed Iliamna-Nondalton Road Reconstruction (SCIS). Even though you submitted your comments three months after the publicized deadline, we would like to address your concerns. We revised the SCIS by incorporating comments received during the advertised public review period, September 6 - October 7, 1996. Many responses provided valuable local knowledge of natural resources, enhancing the development of a thorough impact analysis. We expect you will find the final SCIS adequately addresses the issues and concerns raised in your memo. For your convenience, a copy of the final January 1997 SCIS is attached.

During preparation of the SCIS, our contractor, Gordon Lewis, of Community Planning used a multi-faceted approach. He conducted a literature review, person to person interviews and site investigations of four local communities. As part of his research, Gordon contacted seven employees of the Department of Fish & Game (ADF&G) from various offices to obtain fish and game baseline data, interpolated data from larger area studies, subsistence trends and expected future trends in natural resource use and availability. These employees are listed in Appendix VI, page 61 of the January SCIS. Gordon also interviewed many local residents, subsistence users, government officials, and members of Fish and Game Advisory Boards, also listed on page 61, in an effort to obtain as much study area information as possible.

We encourage you to contact your ADF&G associates during your reading of the final SCIS. In particular, you may find it useful to review records from the July 14, 1995 multi-agency field inspection of the entire proposed reconstruction route, attended by Wayne Dolezal of your office. Pages 4-7 of the final SCIS provide a detailed explanation of the

existing roadway conditions between several landmarks. Your division responded to our September 28, 1995 scoping letter with a November 6, 1995 memo describing road conditions and erosion concerns. We have addressed these issues in our final SCIS and project design.

As suggested by your memo statement, "...after the road is first opened...", you may not have visited the existing roadway in person to witness current normal daily traffic levels. Page 49 shows traffic projections increasing only slightly by 1.12 percent from the 1996 level of 91 trips per day to 100 in 1997, 105 by 2007 and 115 by the design year 2017. This represents a very insignificant increase in current roadway use.

Indeed, we agree there may be cumulative impacts on recreational use of fish & wildlife resources associated with the expected slight increase in projected traffic levels, but these impacts would be minor. As described by Nondalton Tribal Council members during an October 15, 1996 meeting, wildlife densities are somewhat lower along the roadway corridor. Little subsistence use for Iliamna and Nondalton residents occurs along the existing, well-traveled roadway (see SCIS, pages 20-21). We would expect little change in this situation with road reconstruction.

The following comments explain how we have addressed your concerns in the final SCIS:

1. Bridge Costs and Design Issues:

Your memo criticizes a lack of bridge cost and design information in the draft SCIS. The revised SCIS adds a bridge description on page 4, paragraph 3:

"The bridge over the Newhalen River would be a one lane, one way bridge, 540 feet long, with a 14 foot travel way and a 17 foot overall width. The proposed one lane bridge superstructure would consist of 4 steel stringers supporting precast concrete deck panels. A cast-in-place concrete curb would support the metal bridge railing. No asphalt overlay is planned at this time. The bridge would be supported by five piers spaced about 118 feet apart. Each pier would consist of three 30 inch diameter steel pipe piles. Four of the five piers would be placed below the ordinary high water elevation. Some aspects of the bridge design have not been finalized and other particulars about the bridge are not available."

At this time, ADOT&PFs Bridge Design Section has completed only a very preliminary computerized bridge design plan. During preparation of the draft SCIS, this plan was unavailable. Please let me know if you would like to view the preliminary bridge plan. Approximately \$4 million of the \$5 million reserved for this road reconstruction project would be targeted for bridge construction.

2. Key Assumptions:

The last sentence of the key assumptions paragraph has been removed to provide clarity (see January SCIS, Section V(A), page 39). This section describes the reality of a

dynamic, changing environment, as the background for subsequent impact analysis of many issues. Key assumptions must be described to inform the reader of the projected state-wide and national trends which will affect the study area, regardless of the outcome of road reconstruction. This is also an opportunity for the author to isolate some of the variables from the impact analysis and make a focused comparison of the secondary and cumulative impacts associated with and without the project. As stated on page 1 of the SCIS:

“The purpose of this report is to identify and evaluate the cumulative and secondary impacts likely to result from the reconstruction and completion of the road from Iliamna to Nondalton and the no-action alternative.”

Sections B, C, D and E provide detailed, substantiated discussions of likely secondary and cumulative impacts, both positive and negative, both near term and long term, associated with the two alternatives.

3. Section A: Key Assumptions. Environment:

We see no need to revise paragraph two, Environment (page 39 of the January SCIS). As discussed under Key Assumptions, response (2) above, this paragraph is intended to describe the anticipated background during the study period of 5-20 years. It is necessary to isolate some variables in a SCIS to make it possible to study potential impacts. We believe these assumptions are reasonable, since they have existed for many years in this study area already. Paragraph two of Section A is not intended, as you state, to describe, “...how the proposed project would affect the environment over the next 20 years”. Secondary environmental impacts of the proposed project are described in Section B, page 39, and cumulative impacts in Section D, page 58 of the January SCIS.

4. Cumulative Impacts on Recreational Use of Fish & Wildlife Resources:

We revised this paragraph on page 59 of the January SCIS. Changes resulted from researching existing resource data and interviewing individuals listed on page 61.

“The increasing recreational use of the study area is likely to lead to increased pressure on the natural resources which would in turn result in a changing of the wilderness nature of the area. This change of the wilderness nature may result in some lodges shifting to a clientele with different expectations or who are more accepting of development where they recreate. Most of the lodges in the study area would continue to transport clients to remote areas, as they do now, further away from new and existing development. ADF&G personnel have already noted a significant move away from the Iliamna and Nondalton area to the Mulchatna and Nushagak river basins. Those who feel it necessary to have a pristine wilderness experience, and have the means to do so, would continue to seek other areas further away from development.”

The road reconstruction would contribute to the existing pattern of increasing recreational

use of the study area, but would not result in a significant impact on those resources.

5. Erosion:

As illustrated in the photographs on page 8 of the January SCIS report, the roadway already exists and is used by local residents to travel the approximately 14.4 miles north between the Iliamna Airport and the bluff of the Newhalen River. Some areas of the unfinished road consist of soft materials, such as silty volcanic ash and are difficult to traverse in wet conditions. Vehicles leaving the roadway to avoid these areas exacerbate erosion problems, damage upland habitat and create an unnecessary wider road footprint. Because roadway construction was never completed, the runoff from the road surface has cut the side embankment in several places. This road surface run-off could be greatly reduced with proper finish work, establishment of a proper road surface crown and regular funded road maintenance.

As stated in the final SCIS, page 45:

“The reconstruction of the Iliamna-Nondalton Road would lessen degradation of the existing road and associated environmental impacts from roadway run-off and erosion. Regular maintenance after reconstruction of the road north of Alexcy Creek would lessen erosion and damage to the vegetation along the corridor. Erosion at both culvert crossings and dips in the road would be greatly reduced. The disturbance of the Newhalen River bed from heavy equipment and trucks fording the river would be eliminated.”

Thus, road reconstruction would lessen the risk of erosion along the roadway.

6. Fish & Wildlife Harvest:

The majority of the roadway has existed for many years. We do not expect a significant increased harvest of fish and wildlife as a result of the proposed reconstruction. Please refer to paragraph five of this memo, in response to this issue.

7. Fishing Pressure and Recreational Pressure:

Please refer to paragraph two and item (4) of this memo, in response to this issue.

We appreciate your review and comments on the draft report SCIS. If you have any questions on the final SCIS, please contact me at 266-1491, or E-mail: Helen_Lons@dot.state.ak.us.

Attachment: Final SCIS, January 1997

cc: James A. Bryson, Right-of-Way/Environmental Engineer, FHWA
John Dickenson, P.E., Project Manager, Highway Design, ADOT&PF
Don McKay, Permits Supervisor, ADF&G
Susan Wick, Environmental Team Leader, PD&E, ADOT&PF
Ace Worley, Area Planner, ADOT&PF

OCT 04 '96

**BRISTOL BAY
NATIVE CORPORATION**
 800 CORDOVA / P.O. BOX 100220 / ANCHORAGE, ALASKA 99510 / (907) 278-3602
 TELECOPY (907) 276-3924

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr.		<i>Deakerson</i>
Locations		
Env. Team leader		
Staff		<i>HL</i>
Project File		
Central File		

51951

3 October 1996

Susan Wick
 Environmental Team Leader
 ADOT Central Region
 PO Box 196900
 Anchorage, AK 99519

Dear Ms. Wick:

Thank you for the opportunity to review the supplemental environmental study for the Nondalton-Illiamna road project. It further convinced us that our long standing support for this project was appropriate. We have long believed that the environment would benefit from the linking of these communities. The limited secondary and cumulative impacts of the project are vastly out numbered by the positive impacts that the project will have on the economy of the region. Beyond the positive effects on the economy we find that the improvements in the health and safety of these communities should weigh heavily in favor of the project. Just one of opportunities such as the regional landfill possibilities that become available when these communities are linked would justify the project. Improved access to the excellent airport facility at Illiamna would also benefit Nondalton where limited runway length precludes air transport efficiencies.

Over the past few years it is difficult to recall a project that has had such solid support in our region. Local government, borough government, village councils and corporations, and regional profit and non profit organizations all believe that completion of the road link between these communities is in the best interest of the state and the region. It is unfortunate that so many folks who like to visit our region for its abundant wildlife and scenery cannot recognize that economic development of our communities is also part of the equation for rural Alaska. Bristol Bay residents are proud of its state and national parks and refuges and realize that an important attribute of our growing tourism economy are the wilderness values that have been preserved here. But even though the bears outnumber the human population of the region we must support those infrastructure developments that improve the quality of life for the region's citizens. The Illiamna-Nondalton road is that sort of project. We appreciate your consideration of these views.

Sincerely,

Halmar E. Olson
 Halmar E. Olson
 President & CEO

RECEIVED

Bristol Bay Housing Authority

P.O. Box 50 Dillingham, Alaska 99576 FAX (907) 842-2784 Phone (907) 842-5956 OCT 07 '96

October 3, 1996

Susan Wick, Envir. Team Leader
Alaska Dept. of Transportation and
Public Facilities, Central Region
P.O. Box 196900
Anchorage, Alaska 99519

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr. <i>D. Dickinson</i>		
Locations		
Env. Team Leader		
Staff <i>HL</i>		
Project File		
Study File		

RE: Comments on Sept. 1996 Report "Secondary and Cumulative Impact Study of the Proposed Illiamna to Nondalton Road Reconstruction", Project 51951

Dear Ms. Wick:

Thank you for the opportunity to comment on the report "Secondary and Cumulative Impact Study of the Proposed Illiamna to Nondalton Road Construction". I concur with the report the reconstruction of the road and construction of a bridge across the headwaters of the Newhalen River is environmentally benign. I would add that completion of the project is critical to providing a base for the economic survival of the generally indigent resident population and the ability of Nondalton to maintain a governing entity capable of delivering essential public facilities and services.

The negative impact on a housing construction project recently awarded by the Bristol Bay Housing Authority for Nondalton is an example of the economic hardship placed on any endeavor requiring transportation of equipment and materials in localities which lack a surface feed system. BBHA was aware going in that the absence of a conventional mode of surface transportation serving Nondalton would place extraordinary funding pressures on the project, and also understood that in keeping with the current mood of Congress, supplemental federal funding to offset additional costs would not be forthcoming.

Successful bids for construction of the Nondalton units were obtained only after going to bid twice and reducing the scope of the project dramatically, including a reduction in the per unit living space and decreasing the number of single family units from ten to eight. Further, the project was combined with a Newhalen ten unit project as a means of providing additional insurance that bid proposals would fall within budget constraints. Newhalen was to share the same deductions as Nondalton in the scope of their project as a result. The high costs associated with the lack of a conventional means to transport materials and equipment to and from Nondalton was cited by all bidders to be causal for the resulting high bids. These projects, as originally envisioned, would have bid elsewhere in the region within the funding reservation amount, but here suffered a 20% reduction in critically needed housing.

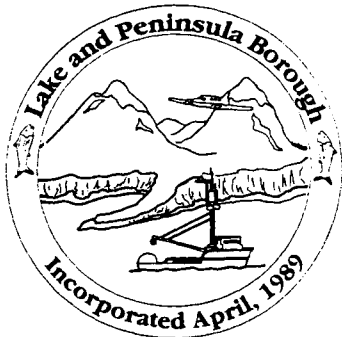
Any venture in Nondalton which requires the mobilization and demobilization of significant amounts of equipment and/or material, be it private sector or public, must share the diminished value of capital as a result of the lack of a usable road system.

Sincerely,



Andy Anderson
Deputy Director

cc: Walt Wrede, Bristol Bay Borough



Lake and Peninsula Borough

P.O. Box 495
King Salmon, Alaska 99613

Telephone: (907) 246-3421
Fax: (907) 246-6602



OCT 09 '96

October 3, 1996

Ms. Susan N. Wick
Environmental Team Leader
ADOT/PF - Central Region
4111 Aviation Ave.
P.O. Box 196900
Anchorage, AK. 99519-6900

RE: Iliamna to Nondalton Rd.
Secondary and Cumulative Impacts Study
Project No. 51951

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr.		<i>Dickenson</i>
Locations		
Env. Team Leader		<i>HL</i>
Staff		<i>HL</i>
Project File		<input checked="" type="checkbox"/>
Central File		<input checked="" type="checkbox"/>

Dear Ms. Wick:

We are writing regarding the report referenced above. The Lake and Peninsula Borough has completed its review of this report and we have found that it adequately and substantially addresses the probable or likely cumulative and secondary impacts associated with reconstruction of the Iliamna-Nondalton Road. This report confirms what the Borough has always believed regarding environmental, cumulative, and secondary impacts associated with this project. In particular, this report confirms the Borough's position that:

- * The environmental impacts are minimal, the positive environmental impacts far outweigh the negative impacts, and the adverse environmental impacts associated with a no-build alternative are unacceptable.
- * The cumulative and secondary impacts are minimal and can be addressed through coordinated land and fish and game management.
- * This project will do nothing to facilitate the development of the Pebble Beach Copper Mine or make it more economically feasible.
- * This project will not significantly change access to or increase visitation rates in Lake Clark National Park.
- * The economic, social, educational, environmental, and health and safety benefits associated with this project overwhelm the relatively minor adverse environmental, cumulative, and secondary impacts identified in the report.



THE LAKE AND PENINSULA SCHOOL DISTRICT

101 Jensen Drive
P.O. Box 498
King Salmon, Alaska 99613
Phone (907) 246-4280/Fax (907) 246-4473



October 4, 1996

Susan N. Wick
Environmental Team Leader
ADOT/PF - Central Region
Division of Design and Construction
4111 Aviation Ave. - P.O. Box 196900
Anchorage, AK. 99519-6900

RE: Iliamna to Nondalton Rd. - Project No. 51951
Cumulative and Secondary Impacts Study

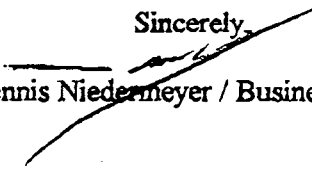
Dear Ms. Wick:

The Lake and Peninsula School District has reviewed the Cumulative and Secondary Impacts Study for the Iliamna-Nondalton Road that ADOT/PF commissioned this past summer. We believe strongly that the report supports ADOT/PF's original conclusion that a categorical exclusion under NEPA was proper and appropriate. We believe that the report confirms that the environmental, cumulative, and secondary impacts associated with this project are minimal. Indeed, if an independent observer examined this project using a cost-benefit analysis, he/she could not help but conclude that the environmental, social, economic, health and safety, and educational benefits associated with this project far outweigh any possible negative impacts.

The School District strongly supports the reconstruction of this road and construction of a bridge over the Newhalen River. Completion of this road will be very beneficial to the District. As the report correctly notes, this project will reduce freight and shippings costs, improve the handling of petroleum products, increase safety for teachers and students, reduce travel costs, allow consolidation of resources, and increase the quality of education for our students by providing them with more social interaction and exposure to a greater number of teachers with different areas of expertise.

We would urge the Department and the Federal Highway Administration to stick by its original decision and proceed with this project in an expeditious manner. Thanks for your time and consideration and please feel free to contact us if you have any questions.

Sincerely,


Dennis Niedermeyer / Business Manager

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr		
Project Mgt		
Locations		
Env. Team (Leader)		
Staff		
Project File		
Central File		

BRISTOL BAY AREA HEALTH CORPORATION

P.O. BOX 130 • DILLINGHAM, ALASKA 99576

(907) 842-5201 or (907) 842-5202

RECEIVED

OCT 07 '96

Box 563 King Salmon, AK 99613

October 4, 1996

Susan N. Wick
Environmental Team Leader
ADOT/PF Central Region
Division of Design and Construction
PO Box 196900
Anchorage, AK 99519-6900

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		/
Project Mgr. Dickinson		
Locations		
Env. Team Leader		/
Staff Hill		/
Project File		/
Central File		/

RE: Iliamna-Nondalton Road, Project no. 51951

Dear Ms. Wick:

I have reviewed the proposed plans of reconstruction and the completion of the road between Iliamna and Nondalton and the environmental impact studies for such a road. It is my conclusion that the positive results of such a road far outweigh any possible negative impacts.

My office provides basic human service interventions to the villages of Nondalton, Iliamna and Newhalen, in the areas of mental health, sexual and physical abuse, alcohol and drug abuse. These villages have proven to be some of the most costly in the region to provide services to primarily due to transportation costs. Our program is presently restricted to one paraprofessional mental health worker in Nondalton and one alcohol worker in Newhalen. Both positions attempt to provide services to all the villages in the Lake Iliamna region. These employees are supervised out of King Salmon and Dillingham. Access to both counselors by clients and supervisors is limited due to a lack of inexpensive, accessible transportation and the dependence on expensive air transport. The completion of the Nondalton-Iliamna road would facilitate increased human service interventions for the local residents by making counselors more accessible, and reduce the expense and increase the ease of supervision, thus improving the quality of services by local providers.

In addition, much of the mental health issues of the region are centered around substance abuse and depression. Both of these conditions are exacerbated by the lack of access to jobs and social isolation. It is my conclusion that the emotional health and social welfare of the communities could be favorably impacted by road access between Nondalton and Iliamna.

Sincerely,

Dottie Hill, M.Ed.
Family Service Worker Coord. II

* That ADOT/PF and the Federal Highway Administration were correct when they concluded that a categorical exclusion under NEPA was appropriate.

The Borough would like to offer the following more specific comments regarding the text of the report. Some of these comments are substantive and others are merely editorial. Substantive comments are highlighted in bold print for easy reference.

1. Page 5, 2nd Paragraph, Iliamna-Nondalton Rd: This paragraph could leave the reader with the impression that the legislature has not yet approved funding for this project. The legislature did in fact approve the funding referred to when it passed the FY 97 Capital Budget. In addition, it should be noted that Governor Knowles touted this project in an Anchorage speech as an excellent example of projects that should be completed under his new transportation initiative.

2. Page 6, Road History: It should be stated more clearly that two wheel drive vehicle use occurs all the way from the airport to the proposed bridge site, including the section from Alexcy creek to the bridge site. Two wheel drive access is possible on all sections of the road (on the Iliamna side of the river) for much of the year. This paragraph as written could leave the reader with the impression that the section of the road from Alexcy creek to the bridge site is suitable for four wheel drive only.

3. Page 7 through 11, Local Setting: This section provides the reader with a geographic, social, economic, and demographic description of the communities of Iliamna and Nondalton. We do not understand why a similar community profile is not provided for Newhalen. This project connects three communities with a surface transportation link. That is one of the strongest arguments in favor of it. A reader unfamiliar with the region and the project could be misled into thinking that this project only benefits two communities.

4. Page 9, 1st Paragraph: It should also be noted here that contact between the three communities of Nondalton, Newhalen, and Iliamna has also increased due to marriage and the subsequent increase in family ties.

5. Page 11, Table 2, Nondalton Population: We believe that the Department of Labor population estimation for 1995 is incorrect. The number should be 227 rather than 327.

6. Page 18, Emergency Medical Services: Although some of these issues are addressed in other sections of the report, we believe it would be useful to describe in this section how health care would be dramatically improved if the road were completed; especially for Nondalton. For example, health care facilities and resources for all three communities could be pooled and consolidated. The residents of the region have long desired a regional hospital or at least the presence of a resident doctor. Both would become more feasible. Medical evacuations from Nondalton would be easier and safer because they would no longer be dependent upon good weather (short airstrip without advanced navigational

aids) or the presence of solid ice or calm water on Six Mile Lake and the Newhalen River (so that the patient could be driven to Iliamna and than transported to Anchorage).

7. Page 19, Education: The report incorrectly states that the Lake and Peninsula School District is located in Naknek. It is actually located in King Salmon.

8. Page 20, Transportation Facilities: We believe more emphasis should be placed upon the high transfer costs as an element of total transportation costs with the existing transportation network. The Borough understands that about 25% of the cost for bring goods and supplies to Nondalton occurs between Iliamna and Nondalton. A completed road would dramatically reduce shipping costs for Nondalton because fewer freight transfers would be required.

9. Page 23, No. 1: The Meshik River is spelled incorrectly.

10. Page 24-25, Transportation Costs, Last Sentence: We question whether the index of 191 from the University of Alaska is accurate. This seems to contradict the rest of this section. We believe that the index for Nondalton must be higher than Iliamna.

11. Page 28, Tazimina River: The report states that the Tazimina River empties into Six Mile Lake about three miles from the mouth of the Newhalen River. We believe the author intended to say that the Tazimina empties into the lake three miles above the outlet of the lake and/or the beginning of the Newhalen River.

12. Page 31, Utilities and Fuel: We believe more should be said about exactly why vehicular traffic crosses the power line near Fish Village. The Iliamna-Nondalton Road ends at the proposed bridge site. This area is characterized by a very steep bluff which makes it a very difficult site to access and cross the river. It is presently easier to drive along the power line easement to a much better site for accessing and crossing the river and/or Six Mile Lake. The construction of this bridge will solve a very serious health, safety, and trespass problem for INNEC, the landowner, and the public at large.

13. Page 34, Key Assumptions: We would like to express our general concurrence with the key assumptions that form the foundation upon which the report's conclusions are drawn. In the local government section, we believe that greater emphasise should be given to the fact that all levels of government will be increasingly pressured to find ways to fund services and provide them more efficiently, including the Borough, the Cities of Newhalen and Nondalton, and the Tribal Councils of Iliamna, Newhalen, and Nondalton. It should specifically be noted that Nondalton is presently having a very difficult time paying for basic local services. This is because cash based economic activity in the community is limited and state funding is declining. Completion of the road would enable the local economy to expand and diversify and in turn, generate the revenues that the community needs to provide basic services such as road maintenance, police, fire, water and sewer etc.

14. Page 39-40, Environment: We believe that Table 7, the Secondary Impacts Matrix and the subsequent discussion in the text understates the positive environmental impacts associated with completion of this road. For example, although the report does discuss the danger associated with fuel spills, the case could be made more strongly. Completion of the road may facilitate the construction of more centralized fuel storage facilities. This would also reduce the odds of a spill because the number of storage facilities would be reduced. The report should also mention in this section (it is mentioned elsewhere) that there would no longer be a need to drive heavy equipment such as trucks, graders, and loaders through the Newhalen River; a world class trout and salmon stream. Finally, the reports neglects to mention that the City of Nondalton recently received a \$600,000 dollar grant through the Village Safe Water Program to construct a Class II landfill and incinerator. This new facility will have the capacity to function as a regional landfill which could accept solid waste from Iliamna, Newhalen, and Port Alsworth. The road would make this possible and enable Iliamna and Newhalen to close their landfills. Perhaps only a transfer site would be necessary for those two communities.

15. Page 39-40, Public Health and Safety: We believe the report seriously understates both the short and long term benefits to health and safety associated with the completion of the road (Table 7). We believe both the short and long term benefits should be rated as major. The first paragraph in the narrative section should be beefed up.

16. Page 40-41, Economics: Although it is mentioned elsewhere, we believe it should be noted here that we expect some diversification of the economy as a result of the completion of the road. This is especially true in the tourism industry. The primary component of this sector presently is sport hunting and fishing. We expect that non-consumptive uses such as cultural tours, general sight seeing, river rafting, hiking, etc. will expand. It is likely that this will create employment opportunities for local residents. In addition, access to existing employment opportunities will be increased for Nondalton residents. The unemployment rate is very high in Nondalton. Completion of the road will make it easy to commute to Iliamna where the cash based economy is much more vibrant. It will also make it much easier to access employment opportunities in Anchorage and the Bristol Bay Fishery via the Iliamna airport and the dock on Iliamna Lake.

17. Page 43, Transportation: It should be noted that the potential for an increase in vehicle related accidents should be offset, at least partially, by the potential for a reduction in boating accidents, air traffic accidents, and accidents related to crossing unsafe ice.

18. Page 43, Lands: The comments about trespass appear contradictory. Perhaps the author intends to say that completion of the road will resolve some existing trespass problems but could create some new ones if the landowners are not attentive to enforcing their permit systems.

19. Pages 45-46 and the Impacts Matrix, Tourism: We disagree strongly that the impacts on tourism are negative. This discussion is very, very narrowly focused on the aesthetic aspects of building a bridge over the Newhalen River. That is almost the entire

discussion of the impacts on tourism. It seems to focus only upon a concern expressed by a particular special interest group that is not located within the region. The economic impacts are likely to be positive due to increased access, diversification of the industry, and increased employment opportunities. The potential for increased float traffic could be offset by a decrease in general boat traffic devoted to transportation and the delivery of goods and supplies. As noted earlier, there are many positive environmental aspects associated with this project including safer fuel handling, a decrease in erosion and siltation, a decrease in tundra disturbance due to off-road driving, better handling of solid waste, and the elimination of the need to drive heavy equipment through the Newhalen River. These enhancements to local environmental conditions cannot help but have a positive impact on tourism because they will improve the quality of the visitor experience. Imagine for example what one fuel spill in the Newhalen River would mean for sport fishing opportunities there.

20. Page 47, Government: We would like to emphasize here again that Nondalton in particular is having a very difficult time providing basic services because economic activity is limited and funding from the state and federal governments is declining steadily. This situation will continue to worsen in the next few years. Completion of the road is a partial solution. The no-build option would insure that Nondalton will not be able to support itself. It would be forced to look to the Borough and the State for assistance. It is not in the State's interest to deny Nondalton the tools it needs to be self sufficient.

21. Page 52, Recreation / Tourism: Again, we take issue with this conclusion. We believe the negative impacts on tourism are overstated and that the positive aspects are ignored completely.

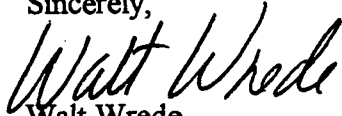
22. The Maps: Several of the maps show that Tazimina Falls are located on the Newhalen River. They are of course, located on the Tazimina River.

In summary, the Lake and Peninsula Borough very strongly supports this project. We believe this report supports our contention that the environmental, cumulative, and secondary impacts are minimal at best. We believe that it also demonstrates that the environmental, social, economic, educational, and health and safety benefits far outweigh any possible adverse impacts that have been identified by this report or the critics of this project.

As you know, NEPA requires that social and economic factors (in addition to environmental factors) must be considered for federally funded projects. Although we do not think this report does a good enough job of describing and examining those benefits, we are satisfied that it at least brings them to the attention of the public so that they are incorporated in the debate over the relative merits of this project. In short, we believe this report confirms that ADOT/PF and the Federal Highway Administration were correct when they concluded that a categorical exclusion under NEPA was appropriate for this project.

We appreciate the opportunity to comment on this report and we commend ADOT/PF for having it commissioned. Please do not hesitate to contact us if you have any questions or need any additional information.

Sincerely,



Walt Wrede
Borough Manager

c.

Governor Knowles
Senator Hoffman
Representative Moses
Commissioner Perkins

BRISTOL BAY AREA HEALTH CORPORATION

Kanakanak Hospital

P.O. Box 130 • Dillingham, Alaska 99576

(907) 842-5201

October 4, 1996

Susan Wick
Environmental Team Leader
ADOT Central Region
PO Box 195900
Anchorage, AK 99519

243-6927

Dear Ms. Wick

Thank you for the opportunity to review the supplemental environmental study for the Nondalton-Iliamna road project. We see no reason to change our mind for our initial support. We have long believed that the environment would benefit from the linking of these communities. The limited secondary and cumulative impacts of the project are vastly out numbered by the positive impacts that the project will have on the economy of the region. Beyond the positive effects on the economy we find that the improvements in the health and safety of these communities should weight heavily in favor of the project. BBAHC has several health staff and clinics in each of the three villages that this road would connect. The ability to use an ambulance when airplanes cannot be used is viewed as very positive, as will be the ability to share fire and rescue abilities. Just one of opportunities such as the regional landfill possibilities that become available when these communities are linked would justify the project. Improved access to the excellent airport facility at Iliamna would also benefit Nondalton where limited runway length precludes air transport efficiencies.

Over the past few years it is difficult to recall a project that has had such solid support in our region. Local government, borough government, village councils and corporations, and regional profit and nonprofit organizations all believe that completion of the road link between these communities is in the best interest of the state and the region. It is unfortunate that so many folks who like to visit our region for its abundant wildlife and scenery cannot recognize that economic development of our communities is also part of the equation for rural Alaska. Why don't they move to close down the road from the lower 48, the road to the North Slope, to the interior, peninsula, etc. Don't they have a far greater impact than ours could ever have? Seems very inappropriate to us. Bristol Bay residents are proud of its state and national parks and refuges and realize that an important attribute of our growing tourism economy are the wilderness values that have been preserved here. But even though the bears outnumber the human population of the region we must support those infrastructure developments that improve the quality of life for the region's citizens. The Iliamna-Nondalton road is that sort of project. We appreciate your consideration these views.

Sincerely,

OCT 24 '96

BRISTOL BAY AREA HEALTH CORPORATION


Robert J. Clark
Chief Executive Officer

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr. JD		✓
Locations		
Env. Team Leader		✓
Staff	HL	✓
Project File		
Central File		✓

cc: Commissioner Joe Perkins, ADOT
Tom Hawkins/Hjalmer E. Olson, BBNC
Walt Wrede, L&P&B

Governor Tony Knowles
Donald Nielsen, BBNA
Executive Committee

Aleknagik • Chignik Bay • Chignik Lagoon • Chignik Lake • Clark's Point • Dillingham • Egegik • Ekuk • Iliamna • Igiugig • Ivanof Bay • King Salmon • Kokhanok • Koliganek • Levelock • Manokotak • Naknek • Newhalen • New Stuyahok • Nondalton • Pedro Bay • Perryville • Pilot Point • Platinum • Port Heiden • Portage Creek • South Naknek • Togiak • Twin Hills • Ugashik

5195

TOTAL P.01



RECEIVED

OCT 07 '96

October 4, 1996

Helen Lons
 Environmental Analyst
 Alaska Department of Transportation and Public Facilities
 Preliminary Design and Environmental
 P.O. Box 196900
 Anchorage, AK 99519-6900

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr. <i>Dickinson</i>		
Locations		
Env. Team <i>Leader</i>		
Staff <i>HL</i>		
Project File		/
Central File	/	/

Subject: Iliamna to Nondalton Road Secondary and Cumulative Impacts Study

Dear Ms. Lons:

On behalf of the Iliamna-Newhalen-Nondalton Electric Cooperative (INNEC), I have reviewed the Department of Transportation and Public Facilities' Secondary and Cumulative Impacts Study of the Proposed Iliamna-Nondalton Road Reconstruction. INNEC supports completion of construction of the road connection with Nondalton and agrees with the general conclusions of the study. Construction of the Iliamna to Nondalton Road should have overall positive direct and indirect impacts to the three communities served by the road.

INNEC would like to see a few points reinforced in the document that have a substantial bearing on how we serve the three communities. Our specific points are detailed below.

- The Tazimina Hydroelectric Project should be mentioned under the 'Key Assumptions' section which discusses utilities and fuel. The project has sufficient capacity to meet the electric demands of the three communities for some time and is expandable beyond 824 kW if demand exceeds capacity.
- Under the 'Likely Secondary Impacts' section dealing with utilities, there are numerous benefits to INNEC customers that would result from construction of the road that should be clearly stated in the document. For example, an improved road would ensure reliable access at **all times of the year** to the access road to the Tazimina Hydroelectric plant. The project access road departs the Iliamna to Nondalton Road one half mile north of the Alexcy Creek bridge. The road in this area has numerous pits of sand and volcanic ash. In prior years, INNEC's line truck has become mired in these pits and had to call for assistance. Such problems with the road delay response time to repair broken powerlines or to conduct needed maintenance. It is crucial that we have access for routine maintenance as well as times when emergency access is required.
- Another benefit to the communities and to INNEC in particular is the avoided cost of vehicle maintenance and repair. The condition of the existing road elevates our annual cost of vehicle repair and maintenance appreciably. Travel on the road is especially hard on shock absorbers, tires, rims, and exhaust systems. This summer we have had three vehicles traveling a portion of the Iliamna to Nondalton Road on a regular basis. Since May 1996 we have had to spend for these three vehicles over \$1,500 on tires, over \$500 on exhaust systems (as a result of being torn from the undercarriage), and at least \$300 on torn brake lines and damaged brake parts. In addition, I personally have spent \$420 on shock absorbers for my small Toyota pick-up truck since shipping it to Iliamna in early 1994.
- Also under the same section, it should be clearly stated that road access to Nondalton will greatly enhance INNEC's ability to provide electrical service to Nondalton. In the event that we have an

51951

outage in Nondalton, our staff will be able to respond relatively quickly and transport any necessary equipment by vehicle directly to the site. In addition, we will be better able to schedule and conduct routine maintenance which should enhance our overall ability to provide electric service at a reasonable cost.

For example, at the present time we have to respond to an outage via airplane charter from Iliamna. These charters cost \$150 to \$170 per round trip. If we cannot solve the problem with the tools that we have repositioned in Nondalton (at some expense), then additional charters are required. Also, the expenses of transporting heavy electric system items such as power poles and transformers are very high in Nondalton due to the lack of proper road access and a bridge crossing of the Newhalen River. A power pole delivered to the dock in Iliamna is about \$550. By the time it is handled several times and put in (or on, in the case of ice) the Newhalen River and towed or dragged to Nondalton, the investment in that pole runs its costs to near \$1,000. If that same pole could be put on a truck at the Iliamna dock and driven to Nondalton, it would cost only \$600. The Bristol Bay Housing Authority currently has plans to construct a small HUD subdivision that requires 11 power poles. The added cost for the poles alone (not to mention other heavy items like transformers and spools of wire) will be \$3,850 over the same type of project in Iliamna. In short, the cost of working with the heavy materials in Nondalton is over 50% more than with the same item in Iliamna due to the cost of transportation caused by the lack of a proper road and bridge.

- Another tangible benefit of the project is the improved safety that results from vehicle traffic being diverted from driving across the right-of-way of the main transmission line to Nondalton. This use is not authorized and it poses a significant hazard to the integrity of the buried cable and those driving across it. The right-of-way for the buried powerline was never intended to be used as a road and it is soft in the low areas and is being eroded in the higher areas. Construction of the road will eliminate this unauthorized use and the potential outage that could result.

The report would be strengthened by the inclusion of a summary section in the beginning of the document informing the reader of the overall conclusions of the study. We agree with the conclusion of the study that the project will have substantial benefits at the local level and little or no impact beyond the three communities served.

Thank you for the opportunity to comment.

Sincerely,



Brent Petrie
General Manager

cc: City of Nondalton Newhalen Tribal Council
 City of Newhalen Nondalton Tribal Council
 Iliamna Village Council Lake and Peninsula School District
 Lake and Peninsula Borough

RECEIVED



3300 Arctic Boulevard, Suite 203
 Anchorage, Alaska 99503
 Phone (907) 562-7380
 Fax (907) 562-0438

	COPY	ACTION
Permit, Design & Environmental Section		
PD&E Engr.	/	
Project Mgr.		Dakense
Locations		
Env. Team Leader	/	
Staff	HL	/
Project File		/
Central File		/

Ms. Susan N. Wick
 Environmental Team Leader
 Department of Transportation
 P.O. Box 196900
 Anchorage, AK 99519-6900

Dear Ms. Wick:

This letter is in response to the draft report, Secondary and Cumulative Impacts Study of the Proposed Iliamna to Nondalton Road Reconstruction. The Southwest Alaska Municipal Conference (SWAMC) supports this project and the findings that confirm that the environmental, cumulative, and secondary impacts associated with this project are minimal.

The completion of the Iliamna-Nondalton road was identified as a priority by SWAMC in its 1996 Overall Economic Development Program Report. The report provides an overview of the economy of Southwest Alaska, including a compilation of key projects identified by member communities and boroughs. This report was approved by the SWAMC Board of Directors, who represent over 130 members in Southwest Alaska, including all organized boroughs and some 20 municipal entities.

As the ARDOR for the Southwest region, SWAMC is strongly committed to expanding economic opportunity in the region as a whole and to the individual efforts of its member communities. SWAMC believes that completing this road has the potential for creating business opportunities and jobs by opening an excellent transportation option, not previously available.

We urge the Department of Transportation and Federal Highway Administration to proceed with this project as soon as possible. Thank you for your consideration. Please contact us if you have any questions.

Sincerely,

Mary S. Stadum
 Executive Director

cc: Lake and Peninsula Borough

Kodiak Island ♦ Alaska Peninsula ♦ Bristol Bay ♦ Aleutian Chain ♦ Pribilof Islands

OUT 07 '96

MOODY'S PETROLEUM

October 7, 1996

Susan N. Wick
Environmental Team Leader
Department of Transportation
P.O. Box 196900
Anchorage, Alaska 99519-6900

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr		
Project File		<i>D. Jensen</i>
Locations		
Env. Team Leader		<i>SL</i>
Staff		<i>HL</i>
Project File		<i>/</i>
Central File		<i>/</i>

51951

The road between Iliamna and Nondalton has existed in its present form since the mid-80s and it has been utilized extensively for commerce and transportation since its initial construction.

The completion of the road on the north side of the river and the installation of the bridge across the Newhalen River will make travel safer and more convenient. More than one life has been lost trying to cross the ice at Six Mile Lake or trying to cross the river between one side and the other.

The installation of the bridge will also allow fuel and other commodities to be hauled more efficiently with less chance of a spill occurring since it will be handled fewer times. It does not matter whether people buy fuel from us or other vendors in Iliamna the point is that because it will be loaded and unloaded only once, instead of two or three times, there is less chance of a drum rupturing and fuel being spilled.

The completion of the road will also help to lower the cost of living in Nondalton. People can have their freight transported to Iliamna and if they choose, can haul the freight themselves by road instead of having everything hauled into Nondalton by air. The road may also lead to the consolidation of some services between the three communities since not every community will have to have the same thing and some specialization may occur if the economies justify it.

We view the completion of the road and bridge as a natural conclusion to a process started years ago and one that has been widely anticipated for years.

Sincerely,



Bob Arce
Manager

P.O. BOX 158 • ILIAMNA, ALASKA 99606 • 907-571-1278

James Forbes

135 Christensen Drive, Suite 300
Anchorage, AK 99501

Attorney at Law

(907) 258-6878
Fax (907) 258-6677
E-mail jforbes@alaska.net

October 3, 1996

OCT 04 '96

Ms. Susan N. Wick
Environmental Team Leader
Division of Design and Construction,
Preliminary Design and Environmental
Alaska Department of Transportation and Public Facilities
4111 Aviation Avenue
P.O. Box 196900
Anchorage, AK 99519-6900

Re: Iliamna to Nondalton Road
Secondary & Cumulative Impacts Study
Project No. 51951

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr.		Dickerson
Locations		
Env. Team Leader		
Staff	HL	
Project File	/	
Central File		/


51951

Dear Ms. Wick:

I have received and read the very comprehensive and thoughtful Secondary and Cumulative Impacts Study of the Proposed Iliamna-Nondalton Road Reconstruction prepared in connection with the above named project. The study seems to more than adequately address the secondary and cumulative impacts of the project, and correctly concludes that the project would have positive environmental impacts.

It would therefore appear that the Federal Highway Administration's decision to grant a categorical exclusion under NEPA was proper. I would urge the Federal Highway Administration and the Alaska Department of Transportation and Public Facilities to stand by that decision, and not be swayed by contrary opinions which are unsupported by objective evidence.

Very truly yours,


James Forbes

Law Office of
GEOFFREY Y. PARKER
Attorney at Law

RECEIVED

OCT 07 '96

500 L Street, Suite 502
 Anchorage, Alaska 99502

Copy of Package

Tel: (907) 272-9377	ACTION
Fax: (907) 272-9379	
Prelim Design & Environmental Section	COPY
PD&E Engr.	<input checked="" type="checkbox"/>
Project Mgr. <i>D. Larson</i>	<input checked="" type="checkbox"/>
Locations	<input type="checkbox"/>
Env. Team Leader	<input checked="" type="checkbox"/>
Staff	<input checked="" type="checkbox"/>
Project File	<input checked="" type="checkbox"/>
Central File	<input checked="" type="checkbox"/>

October 7, 1996

Mr. Steve Horn
 Alaska Department of Transportation & Public Facilities
 4111 Aviation Avenue
 P.O. Box 196900
 Anchorage, Alaska 99519-6900

RE: Our Experts' Comments on Consultant's Report on Proposed Iliamna-Nondalton Road

51051

Dear Mr. Horn:

I think there are two major issues in this case. First, whether a highway or road exists, within the professional meaning of those terms, so as to qualify this project for a categorical exclusion from NEPA. Second, whether the project is cost-beneficial.

As you know, my clients have hired three types of experts to review the ADOT consultant's report titled "Secondary and Cumulative Impacts Study of the Proposed Iliamna-Nondalton Road Reconstruction" ("SCIS" herein.) We hired:

1. Jon Manton, a civil engineer and highway engineer from Washington State, certified in Alaska, and who now does consulting in civil engineering and planning. He has worked in Southwest Alaska. I have enclosed his report to me, and I will have to submit his resumé as a supplement.
2. LGL Alaska Research Associates of Anchorage, a firm which provides ecological research and consulting services to a large variety of clients in Alaska. There, we hired two fishery biologists, Steve Davis and William Wilson, and a wildlife biologist, Matthew Cronin. Their report to me is enclosed, to which I have attached their resumes.
3. Dr. John Duffield, a professor of economics at the University of Montana and owner of BioEconomics, Inc. in Missoula. His report to me is enclosed, and I have attached his resume to his report. He is widely published professionally in the field of nonmarket and market natural resource economics, is frequently hired by state and federal agencies, and is co-author, with Kevin Ward, of the legal treatise Natural Resource Damages: Law and Economics, 1992, John Wiley & Sons (New York). Dr. Duffield is also familiar with Southwest Alaska and the Newhalen River. He has fished and floated rivers in Southwest Alaska and elsewhere in the state.

Their reports speak for themselves, and as we discussed our consultants may supplement them. Nevertheless, I'll summarize what I view as their primary conclusions and topics.

A. Mr. Manton's Report

Mr. Manton addressed the issues of: (1) whether this is a road or highway within the professional terminology of his profession, such that a categorical exclusion would be appropriate, and (2) the benefit/cost ratio.

1. Whether a Highway/Road Exists

Mr. Manton concludes that, within conventional professional terms, and within the plain meaning of the terms in 23 C.F.R. 771.117(d)(1) and the definition of a "pioneer road" at 5 AAC 05.040, this route does not qualify as a "road" let alone a "highway." He points out many inconsistencies between the facts as they appear in the record and the treatment by ADOT of the route as an existing road or highway. I won't reiterate those inconsistencies and instead will let his report speak for itself. Tellingly, he points out that the underlying soils engineering analysis also refers to most of the route still currently at issue as "construction of a new roadway."

In addressing whether a road or highway exists, Mr. Manton begins and ends with a rather interesting inconsistency in the SCIS. He points out that a core assumption of the SCIS, in discussing secondary and cumulative impacts, is that environmental laws will be implemented and enforced. Yet, the SCIS undertakes no analysis of whether this is an existing highway or road within the meaning of 23 C.F.R. § 771.117(d)(1), or within the meaning of the definitions of various kinds of roads in 17 AAC 05.040. Therefore, the SCIS is premised on ignoring the environmental laws relevant here, and therefore the SCIS itself violates its core assumption that environmental laws will be implemented and enforced.

2. Benefit/Cost Analysis and Ratios

At the threshold, Mr. Manton observes that in his professional career he has never seen a public works project built on so low a benefit/cost ratio as 0.26 and that the SCIS fails to address the issue of cost/benefit analysis. (Steve, I raised this issue over the phone to you twice, after having raised it in correspondence to ADOT. I pointed out that this issue was missed in your letter to me describing the prospective SCIS. You assured me that this issue would be included. It has not been.)

Nevertheless, Mr. Manton identifies that the 1986 cost/benefit study, which resulted in previous termination of the project, actually recognized implicitly that ADOT was inflating the benefits. The 1986 analysis did so by expressly stating that it

was ignoring the FHWA standard that the costs of use of an unpaved road are twice the costs of use of a paved road. Instead, the 1986 study chose to increase the costs only 50 percent above the costs of use of a paved road.

That led Mr. Manton to recalculate the benefit to cost ratio. He does so in two ways. First, if the sunk costs of the 1983-84 construction are included, the overall benefit/cost ratio is 0.074, and second, if the sunk costs are not included, then the benefit/cost ratio is 0.089.

B. LGL's Report

LGL addresses the issues of fish and wildlife habitat and management. LGL's chief criticism seems to be that a wide variety of habitat and management issues were not addressed or were incompletely addressed. It identifies 30 "typical" questions related only to five species (rainbow trout, sockeye salmon, brown bear, moose and caribou) that should have been addressed but were not.

I view such matters as feeding into both the NEPA requirements and the requirement for cost/benefit analysis.

C. Dr. Duffield's Report

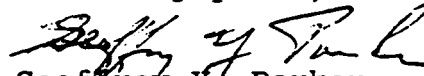
Dr. Duffield's basic conclusion is that the SCIS study does not satisfy the minimal requirements for an environmental planning document. At the threshold, he observes that the SCIS fails to recognize that the actual, proposed project is simply building the bridge, rather than the whole of the road and bridge. His point seems to be captured in his observation that, given the history of the project, funding for the whole road and bridge is at best uncertain, and the SCIS fails to address impacts if the bridge is built but the overall project is not completed.

He then goes on to criticize a large variety of shortcomings in the SCIS. He identifies the SCIS's failure to examine any range of alternatives (and he suggests several alternatives), its failure to define meaningfully the topics of impact addressed, its inconsistent comparison and inappropriate comparison of the alternatives of building the road and bridge when compared to no action, its failure to satisfy minimal professional standards for documentation, its inconsistent treatment of data or failure to report reasonably available data, its incomplete and inconsistent characterization of economic impacts, including failure to quantify economically the extreme amount of subsidy involved here for the road users, its failure to quantify economically the potential changes in nonmarket values related to recreation, and its failure to address goals of the coastal zone management plan related to maintaining recreational resources. He makes a variety of suggestions for improving the SCIS and economic and cost/benefit

analysis.

Again, I view such matters as feeding into both the NEPA requirements and the requirement for cost/benefit analysis.

Sincerely yours,



Geoffrey V. Parker

enclosures (3)

DOT Note: The referenced enclosures are not bound in this document. They are available upon request from DOT.

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

CENTRAL REGION - DIVISION OF DESIGN AND CONSTRUCTION
PRELIMINARY DESIGN & ENVIRONMENTAL

TONY KNOWLES, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
(FAX 243-6927 - TDD 266-1442)
(907) 266-1508

January 13, 1997

Re: Iliamna to Nondalton Road
Secondary and Cumulative Impacts Study
Project No. 51951

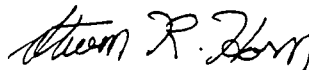
Dear Reader:

The Alaska Department of Transportation and Public Facilities (ADOT&PF) is pleased to announce completion of the *final* report, "Secondary and Cumulative Impacts Study of the Proposed Iliamna to Nondalton Road Reconstruction". In response to requests from citizens, our independent contractor completed this comprehensive evaluation of secondary and cumulative impacts associated with this project.

During an advertised public review period, September 6 - October 7, 1996, we received numerous comments and suggestions. Many responses provided valuable local knowledge, enhancing the development of a thorough impact analysis, and have been incorporated into the final report.

We are proceeding with the design of this project and expect construction to begin during the summer of 1998. If you have any questions concerning design or construction, please contact John Dickenson, P.E., Project Manager, at 266-1469. If you need information about this report, please contact Helen Lons, Environmental Analyst, at 266-1491.

Sincerely,



Steven R. Horn, P.E.
Supervisor

Enclosure

CC: James A. Bryson, Right-of-Way/Environmental Engineer, FHWA
John Dickenson, P.E., Project Manager, ADOT&PF
Helen Lons, Environmental Analyst, ADOT&PF
Susan N. Wick, Environmental Team Leader, ADOT&PF
Ace Worley, Area Planner, ADOT&PF

Bob Arce
L&PB Assembly
P.O. Box 158
Iliamna, AK 99606

Brent Petrie
INNEC
Box 210
Iliamna, AK 99606

Dennis Neidermeyer
P.O. Box 498
King Salmon, AK 99613

Mayor Tom Green
City of Nondalton
P.O. Box 89
Nondalton, 99640

Bill Pierce
Superintendent
LCNPP
4230 University Drive, Suite 311
Anchorage, AK 99508

Lee Fink
Chief Ranger
LCNPP
Port Alsworth, AK 99653

Wassie Balluta
P.O. Box 170
Iliamna, AK 99606

Mayor Glen Alsworth
L+PB
Box 1
Port Alsworth, AK 99653

Walt Wrede
Borough Manager
L&PB
P.O. Box 495
King Salmon, AK 99613

Wayne Dolezal
ADF&G
Habitat Protection Division
333 Raspberry Road
Anchorage, AK 99518-1599

Kelley Hepler
ADF&G
Division of Sport Fish
333 Raspberry Rd.
Anchorage, AK 99518-1599

Mac Minard
ADF&G
Sport Fish
P.O. Box 230
Dillingham, AK 99576

Dick Sellers
ADF&G
Wildlife Conservation
P.O. Box 37
King Salmon, AK 99613

Larry Vandale
ADF&G
Wildlife Conservation
P.O. Box 1030
Dillingham, AK 99576

Pippa Coliey
ADF&G
Subsistence Division
P.O.Box 1030
Dillingham, AK 99576

Jeff Regnart
ADF&G
CFMD
333 Raspberry Rd.
Anchorage, AK 99518-1599

Greg O'Keef
Kijik Corp.
4155 Tudor Ctr. Drive
Suite 104
Anchorage, AK 99508

Eleanor M.C - Johnson
Kijik Corp.
4155 Tudor Ctr. Drive
Suite 104
Anchorage, AK 99508

John Adcox
P.O. Box 187
Iliamna, AK 99606

Harvey Anelon
P.O. Box 286
Iliamna, AK 99606

Myrtle Anelon
President
Iliamna NativeLtd.
P.O. Box 248
Iliamna, AK 99606

Sue Arce
General Delivery
Iliamna, AK 99606

Mayor Jim Lamont
City of Newhalen
Newhalen, AK 99606

Ronald Wassillie
President
Newhalen Tribal Council
Newhalen, AK 99606

Tim LaPorte
Iliamna Air Taxi
General Delivery
Iliamna, AK 99606

Debby Tennison
DCRA
P.O. Box 790
Dillingham, AK 99576

Jeff Parker
Richard A. Jameson & Associates
Attorneys at Law
500 "L" Street, Suite 502
Anchorage, AK 99502

Doug Bailly
637 West 3rd Ave.
Anchorage, AK 99501

Phil Culter
President
Alaska Sportfishing Association
P.O. Box 24-1847
Anchorage, AK 99524-1847

Cliff Eames
Alaska Center for the Environment
519 West 8th Ave., Suite 201
Anchorage, AK 99501

John Moores
BBNC
P.O. Box 100220
Anchorage, AK 99510

Kirk D. Gay
Valhalla Lodge
P.O. Box 190583
Anchorage, AK 99519-0583

Carl Bullo
Alaska Wilderness Lodge
Wilderness Point
General Delivery
Port Alsworth, AK 99653

Bruce Johnson
Bristol Bay Sportfishing
P.O. Box 164
Iliamna, AK 99606

Copper River Lodge
P.O. Box 200831
Anchorage, AK 99520

Roger & Lula Cusack
Cusack's Alaska Lodge
P.O. Box 194
Iliamna, AK 99606

Ken Owsichek
Fishing Limited Lodges
P.O. Box 190301
Anchorage, AK 99519

Jim Winchester
Iliamna Lake Resort
P.O. Box 208
Iliamna, AK 99606

Ted Gerken
Iliaska Lodge
P.O. Box 228
Iliamna, AK 99606

Brad or Sheryl Johnson
Lakeside Lodge
Port Alsworth, AK 99653

Tim and Nancy La Porte
Lake View Lodge
P.O. Box 109
Iliamna, AK 99606

Bill Sims
Newhalen Lodge
3851 Chinak Bay Dr.
Anchorage, AK 99515

Mark Kneen
Point Adventure Lodge
P.O. Box 141
Iliamna, AK 99606

Craig Augustynovich
Rainbow King Lodge
P.O. Box 106
Iliamna, AK 99606

John Baechler
Red Quill Lodge
P.O. Box 49
Iliamna, AK 99606

Glen and Patty Alsworth
The Farm Lodge
Port Alsworth, AK 99653

Jim Forbes
Attorney
135 Christiansen Drive
Suite 300
Anchorage, AK 99501

Mark Hickey
211 4th St.
Suite 108
Juneau, AK 99801

Gordon Lewis
Community Planning
3100 C Portage Bay Place East
Seattle, WA 98102

Ms. Marianne G. See
Statewide Public Service Director
AK Department of Environmental
Conservation
555 Cordova Street
Anchorage AK 99501

Mr. Lance Trasky
Habitat Restoration Division
AK Dept. of Fish and Game
333 Raspberry Road
Anchorage AK 99518

Ms. Anne Rappoport
ANC Fish and Wildlife Enhancement
U.S. Fish and Wildlife Service
605 West 4th Ave. Room 62
Anchorage AK 99501

Mr. Ronald Morris
Supervisor
National Marine Fisheries Service
222 West 7th Avenue, #43
Anchorage AK 99513

Mr. Don Kohler
Regulatory Branch
U.S. Army Corps of Engineers
P.O. Box 898
Anchorage AK 99506-0898

Mr. Ted Rockwell
Alaska Operations Office
U.S. Environmental Protection Agency
222 West 7th Ave., #19 (Rm.537)
Anchorage AK 99513-7588

Ms. Judith Bittner
State Historic Preservation Officer
Office of History and Archaeology
3601 "C" Street, Suite 1278
Anchorage AK 99503-5921

John Johnson
Director
Village of Iliamna
P.O. Box 286
Iliamna, AK 99606

Eleanor M. C-Johnson
Kijik Corp.
4155 Tudor Ctr. Drive
Suite 104
Anchorage, AK 99508

Sue Flensburg
Bristol Bay Coastal Resource Service Area
P.O. Box 849
Dillingham, AK 99576

FAA-Airports Division
222 West 7th Avenue, #14
Anchorage, AK 99513

Barah Gay
900 Cosmos Dr.
Anchorage, AK 99517

Ken Arndt
Tidemark
P.O. Box 249
Homer, AK 99603

Clara Trefon-Tribal Administrator
Nondalton Tribal Council
P.O. Box 49
Nondalton, AK 99640

Joan Darnell, Team Leader
Alaska Systems Support Office
1525 Gambell St.
Anchorage, AK 99503

Resource Analysts
ATTN: Jim Glaspell
P.O. Box 773216
Eagle River, AK 99577

Bruce Bowler
DOT & PF HQ
Engineering and Operations Division
3132 Channel Drive
Juneau, AK 99801

Bob Evans
P.O. Box 100384
Anchorage, AK 99510

Anne Leggett
C/O HDR
2525 C Street
Anchorage, AK 99503

~~Alaska Sportfishing Association
P.O. Box 24-1147~~

{ Allen Backford
BRISTOL BAY NATIVE ASSN.
P.O. Box 310
Dillingham, AK 99576

October 7, 1997

Re: Iliamna Road Improvements
Project No. STP-0214(3)/51951
RE-SCOPING LETTER

Dear :

The Alaska Department of Transportation & Public Facilities (ADOT&PF) is continuing to solicit comments and information on a proposal to upgrade and improve road access between the Village of Iliamna and the City of Nondalton. Figure 1, enclosed, shows the location of the proposed work. The dimensions are approximate and will be finalized as design progresses. Figures 2-4 show the proposed Newhalen River bridge site and other points along the project.

A scoping letter (enclosed) was sent to agencies on September 28, 1995. Agency comments, including your agency's comments (enclosed) were considered and included in a NEPA Categorical Exclusion (CE) document. The Federal Highway Administration (FHWA) evaluated and approved the CE on January 3, 1996. Subsequently, ADOT&PF received correspondence from parties expressing concern over possible secondary and cumulative impacts. In response, ADOT&PF hired a contractor to prepare a Secondary and Cumulative Impacts Study (SCIS), conducted public scoping activities for the SCIS and re-evaluated the CE. The FHWA concluded that the re-evaluation documentation substantiated the finding that no secondary and cumulative impacts would be of a significant level.

Notwithstanding the finding that the CE was legally sufficient, after careful consideration of all the environmental documents and public input, the FHWA determined that further environmental analysis and public involvement, in the form of Environmental Assessment (EA) development, would be beneficial to the FHWA, ADOT&PF and the public interest. This letter is the first stage of a re-scoping effort to solicit comments and information for an EA.

An expanded Statement of Purpose and Need is enclosed. The proposed improvements are described in the enclosed original scoping letter. In accordance with the Interagency Working Agreement to Integrate Section 404 and Related Permit Requirements Into the National Environmental Policy Act

October 7, 1997

(MOU) of June 6, 1996, we are seeking written concurrence on this project Statement of Purpose and Need. Please complete the enclosed MOU Concurrence/Nonconcurrence form and return it to me by November 26, 1997. A Build Alternative and a No Action Alternative will be explored, as well as additional reasonable alternatives suggested during the re-scoping process.

Road improvements would involve placement of fill in wetlands, requiring Corps of Engineers Section 404/10 and possible Nationwide Permits, and a Coastal Zone review for development within the Bristol Bay Coastal Resource Area. A Coast Guard Section 9 Bridge Permit and an Alaska Department of Fish & Game Habitat Permit will also be required.

The Department of Natural Resources (DNR), State Historic Preservation Office (SHPO) requested a reconnaissance level cultural resources survey be conducted on a 1.7 mile segment of the proposed road corridor between the material source southwest of Nondalton and the Newhalen River. The DNR Office of History and Archeology performed this survey in September, 1996, and concluded that there are no cultural properties in the project area. The SHPO issued a Finding of No Effect on October 18, 1996.

To ensure that all factors are considered in the development of the proposal, your written comments and information are requested by the scoping period deadline of Friday, November 7, 1997. Public scoping meetings are scheduled for October 27th in Iliamna, October 28th in Nondalton and November 4th in Anchorage. If you would like more information about these meetings, or have any questions please contact Ms. Helen Lons, Environmental Analyst, at 269-0529.

Sincerely,



Susan N. Wick
Environmental Team Leader

Enclosures: Statement of Purpose and Need
Original scoping letter, September 28, 1995
Figures 1-4
Agency response to Original scoping letter

cc: Jim Bryson, Realty/Environmental Officer, FHWA
John Dickenson, P.E., Project Manager, Highway Design
Helen Lons, Environmental Analyst, PD&E
Jack Melton, Area Planner, ADOT&PF Planning

Ms. Marianne G. See
Statewide Public Service Director
AK Dept. of Environmental Conservation
555 Cordova Street
Anchorage AK 99501

Mr. Lance Trasky
Habitat Restoration Division
AK Dept. of Fish and Game
333 Raspberry Road
Anchorage AK 99518

Ms. Anne Rappoport
ANC Fish and Wildlife Enhancement
U.S. Fish and Wildlife Service
605 West 4th Ave. Room 62
Anchorage AK 99501

Mr. Ronald Morris
Supervisor
National Marine Fisheries Service
222 West 7th Avenue, #43
Anchorage AK 99513

Mr. Larry L. Reeder
Regulatory Branch
U.S. Army Corps of Engineers
P.O. Box 898
Anchorage AK 99506-0898

Mr. Ted Rockwell
Alaska Operations Office
U.S. Environmental Protection Agency
222 West 7th Ave., #19 (Rm.537)
Anchorage AK 99513-7588

Mr. Gary Prokosch
Div. of Mining & Water Mgmt
Dept. of Natural Resources
3601 C Street, Suite 800
Anchorage, AK 99503-5935

Mr. Jim Bryson
Alaska Division FHWA
Box 21648
Juneau, AK 99802-1648

Division of Governmental Coordination
Office of Management & Budget
3601 C Street, Suite 370
Anchorage, AK 99503

C:\pro\iliamna\re-scope\addlst.mer

Iliamna Nondalton Road Improvements Statement of Purpose and Need

The State of Alaska, the communities of Iliamna, Newhalen and Nondalton, and the Lake and Peninsula Borough have identified the need for improving overland access between Iliamna/Newhalen and Nondalton. It is the highest priority transportation improvement project of the Lake and Peninsula Borough, as well as the communities of Iliamna/Newhalen and Nondalton. A well-traveled, but substandard gravel road suitable for cars, trucks, and heavy equipment exists from Iliamna/Newhalen to the bridge crossing site at the Newhalen River. A lesser pioneer road/ATV trail exists from the crossing site to Nondalton. Some portions of the road/trail cross Native corporation property because the road clearing has overgrown. The improvement and completion of this road offers many important economic and social benefits for the reasons outlined below:

Public safety will be improved. There will be less reliance on air transportation between Iliamna/Newhalen and Nondalton. Small aircraft transportation has a much higher death and injury rate per passenger than surface transportation. Therefore, the opportunities and likelihood of serious injuries and accidental deaths resulting from air travel between Iliamna/Newhalen and Nondalton will be lessened. Currently, overland winter travel between Iliamna and Nondalton is possible, but hazardous, across the frozen Newhalen River and Sixmile Lake. During the winter of 1995, two snowmachine riders drowned after falling through the ice near Nondalton. With a bridge, safer overland transportation, especially during periods of inclement weather, reduced visibility, and unstable river ice conditions, will become the preferred method of travel.

Health care/services will be improved. It will be easier to share facilities, expertise, equipment and evacuate the critically ill or injured. The difficulty and expense of getting very ill or injured people out of Nondalton in an emergency will be lessened. This benefit will be especially valuable in the event of a major disaster such as a fire.

The economies of Iliamna/Newhalen and Nondalton will expand and diversify as a result of this project, largely due to the resulting lower costs of goods in these communities. Currently, Nondalton is the largest community in the Lake and Peninsula Borough, but it is relatively isolated and offers very few job opportunities. If Nondalton is connected to Iliamna/Newhalen by road, the customer base for local businesses will effectively be doubled. This will give Nondalton residents the ability to take advantage of a greatly expanded range of employment opportunities. A further important benefit of this project will be the reduction in costs to passengers and carriers of freight between Iliamna/Newhalen and Nondalton. These cumulative economic factors are likely to increase trade and commerce between Iliamna/Newhalen and Nondalton.

Supply of government services to the residents of these communities should become more efficient and convenient as a result of increased and less expensive access. Government facilities at all levels could be consolidated at one place on the road system rather than being spread out among several communities.

There will result a long-term enhancement on the delivery of educational services, with benefits increasing over time. Completion of the Iliamna-Nondalton Road will benefit the school district through an improved ability to transport supplies, materials, students and personnel between Iliamna/Newhalen and Nondalton. The improvements will not only reduce costs but will also increase the safety of students and staff who travel regularly between these communities. The road reconstruction will also provide the school district options in providing enhanced secondary programs to students in Newhalen and Nondalton where student populations are not large enough to warrant the diversity of curriculum that could be made available if certain classes were consolidated. Improved transportation services will also provide students from both schools enhanced competition opportunities in sports activities.

The project will have a positive effect on the growth of "middle of the market" tourism in Iliamna/Newhalen and Nondalton. Alaska Department of Fish and Game reports the current growth in angler days at between seven and 11 percent per year in this general area. Air taxi operators report similar growth rates for their operations during the summer and fall. Many other signs and statistics point to an increase in the utilization of the area. The project will provide some of the infrastructure necessary to accommodate growth of the mid-market tourism. Iliamna is a favorite destination for recreational fishing on the Newhalen River and Nondalton is the largest community adjacent to Lake Clark National Park.

The project will have positive environmental effects by correcting, or alleviating, some serious environmental problems which presently exist:

First, because no bridge exists, it is now necessary to drive vehicles and heavy equipment across the Newhalen River (a world class salmon and rainbow trout resource) to access the other side. As an example, the Alaska Department of Fish and Game (ADF&G) has issued the City of Nondalton permits to drive its heavy equipment across the river so it can maintain the remainder of the road to Iliamna. With a bridge, it would not be necessary to disturb fish habitat by driving vehicles across the river bed.

Second, the existing road has some engineering and design problems and is not as well maintained as it would be if the link between Nondalton and Iliamna were complete. This situation results in unnecessary environmental damage along the road corridor. For example, there is serious erosion taking place at bridge sites and elsewhere along the road. The road also has drainage problems in certain areas. This frequently results in large sections of the road becoming impassable due to mud. During these periods, vehicles attempt to drive around the poorly drained areas which causes the "footprint" of the road to become wider and wider and results in unnecessary damage to the adjacent tundra. The proposed road improvements will alleviate these problems.

Third, the current method of getting fuel to the community of Nondalton, in addition to being a hardship for its residents, represents a serious threat to the environment. The Nondalton airstrip is too short for cargo planes to legally land. Further, fuel cannot be transported overland to the Iliamna airport or dock because there is no bridge across the Newhalen River. As a result, Nondalton residents must get their fuel in Iliamna, transport it by road to a place along the river several miles below the proposed bridge site known as the "landing," and then transport the fuel by skiff in 55 gallon drums up the river and across Six Mile Lake to Nondalton. The environmental risks associated with this complex mode of transporting fuel are significant. The proposed road improvements will alleviate these problems.

In conclusion, the long history of study and number of endorsements for improving the overland access between Iliamna/Newhalen and Nondalton demonstrates the need for this project. The purpose of this project is to meet those needs to the greatest extent that is practical.

Revised 10-6-97

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

CENTRAL REGION - DIVISION OF DESIGN AND CONSTRUCTION
PRELIMINARY DESIGN & ENVIRONMENTAL

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
(FAX 243-6927 - TDD 266-1442)
(907) 266-1508

September 28, 1995

Re: Iliamna - Nondalton Road
Project No. 51951

Environmental Scoping Comments

Mr. Walt Wrede
Manager
Lake and Peninsula Borough
Box 495
King Salmon, AK 99613

Dear Mr. Wrede:

The Alaska Department of Transportation and Public Facilities (ADOT&PF) requests your comments on a project to resurface, restore, and rehabilitate the existing road from Iliamna to the Newhalen River, construct a bridge over the Newhalen River, and reconstruct a pioneer road from the new bridge to the improved road leading to Nondalton (see Figure 1). The purpose of the proposed project is to provide a year round road system between the communities of Iliamna, Newhalen, and Nondalton.

Presently goods and people flying into the regional Iliamna Airport either fly to Nondalton or are transported by vehicle to the Newhalen River and must travel by boat to Nondalton. This process is time consuming and expensive. During the winter, flights into the smaller Nondalton airport are often delayed by weather conditions. The ice on the Newhalen River is often unsuitable to cross.

The three communities have successfully created an electrical coop. Newhalen officials have stated that safe year round surface access would aid in creating other regional cooperative facilities (i.e. landfills, hospitals, schools). In addition, a bridge across the Newhalen River would eliminate fording the river with construction equipment, which is the current practice.

During the 1980's, right of way was acquired and cleared all the way from Iliamna to Nondalton. Portions of the route were improved to various degrees. This project would rehabilitate the route to a uniform 20-foot wide roadway, impacting approximately 4 acres of wetlands from slope

flattening and installation of culverts in the various drainages from the river northward to Nondalton. Embankments will be stabilized to prevent and arrest erosion.

The proposed bridge design would construct a steel girder bridge with four piers. Wingwalls at either end would require approximately 500 cubic yards (c.y.) of material deposited below ordinary high water. The proposed structure would be approximately 540 feet long by 17 feet wide (outside dimensions). Total area of wetlands impact for bridge construction is approximately 11,000 square feet or 0.25 acres.

The roadway approach to the bridge from the south would be straightened and excavated to a lower elevation. No wetlands involvement would result from this action. Material required for construction would be obtained from excavation and an existing upland material source located near Nondalton.

An agency scoping trip took place on July 14, 1995. The group visited Iliamna and Nondalton, drove the road to the Newhalen River from Iliamna and inspected the bridge site from both the north and south approaches (see enclosed photos).

As presently envisioned, ADOT&PF does not anticipate any significant impacts and will be developing a Categorical Exclusion. Permits/approvals necessary to complete the proposed work would include the following:

1. A Department of the Army Section 404/10 permit for placement of fill in waters of the U.S.;
2. A U.S. Coast Guard Section 9 permit for bridge construction in a navigable waterway;
3. An Alaska Department of Fish & Game Title 16 permit for work below ordinary high water of the Newhalen River;
4. Alaska Department of Environmental Conservation water quality certification; and
5. Division of Governmental Coordination final coastal consistency determination.

In addition to identifying any concerns and/or issues the city might have with the proposed project, the following information is requested:

1. Identify any existing and/or proposed zoning requirements and/or land use controls in the project area.
2. Identify any other local improvement projects under construction or proposed in the vicinity of the project within the foreseeable future.
3. Is the project supported by the community?

We are requesting that comments on this project be received by our office no later than October 27, 1995. If you have any questions, please call Hank Wilson, Highway Design Chief, at 266-1700, or myself at 266-1507.

Sincerely,

Susan Wick

Susan Wick
Environmental Team Leader

/DB

Enclosures

cc: Debbie Bertossa, Environmental Analyst, PD&E
Hank Wilson, P.E., Chief, Highway Design

Mr. Walt Wrede
Lake and Peninsula Borough
Box 495
King Salmon AK 99613

Ms. Judith Bittner
Dept. Natural Resources
Box 107001
Anchorage AK 99510-7001

Mr. Harvey Analon
Village of Iliamna
P.O. Box 286
Iliamna AK 99606

Mr. Brent Petrie
Box 210
Iliamna AK 99606

Mr. Ted Rockwell
Environmental Protection Agency
222 W. 7th Ave., #19 (Room 537)
Anchorage AK 99513-7588

Ms. Ann Rappoport
U.S. Fish & Wildlife Services
605 W. 4th Ave., Room 62
Anchorage AK 99501

Mr. Ronald Morris
U.S. Dept. of Commerce
222 W. 7th Ave., #43
Anchorage AK 99513-7577

Mr. Don Kohler
COE, Regulatory Branch
P.O. Box 898
Anchorage AK 99506

Mr. Richard Thompson
Land and Water Management
Pouch 107005
Anchorage AK 99510-7005

Mr. Gary Saupé
Dept. of Environmental Conservation
555 Cordova St.
Anchorage AK 99501

Mr. Lance Trasky
AK Dept. of Fish & Game
333 Raspberry Rd.
Anchorage AK 99518

Mr. Jim Helfinstine
Aids to Navigation
Box 25517
Juneau AK 99802-5517

Mr. Brent Petrie
Iliamna-Newhalen Electric Co-op
Box 210
Iliamna AK 99606

Mr. Tom Greene
City of Nondalton
General Delivery.
Nondalton AK 99640

Ms. Sue Flensburg
Box 849
Dillingham AK 99576

Mr. Tom Hawkins
Box 100220
Anchorage AK 99510

*faxed to:
Madeleine Mulholland
Cominco American
563-4244*

SCOPING LETTER BLURBS

Alaska Department of Fish and Game - ADF&G.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

1. Any information and/or data on anadromous or resident fish streams in the vicinity of the proposed project.
2. Identify any State Game Refuges and/or Critical Habitat Areas in the vicinity of the project. If these areas exist in the vicinity, then would the normal activities of these areas be affected by the proposed project?
3. Identify any permits and/or clearances to be obtained from your agency for the proposed project.

Aircarriers - Aircarri.wcm

In addition to identifying any concerns and/or issues your company might have, please provide any information and/or data with respect to airport use, access problems, land use concerns, bird strike problems or conflicts with other animals, subsistence use on or accessed through airport property, accidents, and/or any other special conditions that may be affected by the proposed project.

City or Village - city.wcm

In addition to identifying any concerns and/or issues the city might have with the proposed project, the following information is requested.

1. Identify any existing and/or proposed zoning requirements and/or land use controls in the project area.
2. Identify any other local improvement project under construction or proposed in the vicinity of the project within the foreseeable future.
3. Is the proposed project supported by the community?

U.S. Army Corps of Engineers - coe.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

1. Any information and/or data with respect to the base floodplains, regulatory floodways, and/or special flood hazard areas of drainages that may be affected by the proposed project.
2. Identify any permits and/or clearances to be obtained from your agency for the proposed project.

State or Local Coastal Zone Management - czm.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

1. Identify any potential conflicts with the goals or objectives of the local coastal management program.
2. At the present time, does your agency have any objections to the proposed project?

Alaska Department of Environmental Conservation - dec.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

1. Identify any known or suspected contaminated sites, and registered underground storage tanks that may affect or be affected by the proposed project.
2. Identify any water quality concerns.
3. Any information and/or data on existing (permitted or unpermitted) solid waste landfills, dumps, discharges, or sewage lagoons in the project area.
4. Any information and/or data on existing drinking water supplies in the project area.
5. Identify any permits and/or clearances to be obtained from your agency for the proposed project.

Alaska Department of Natural Resources - dnr.wcm

In addition to identifying any concerns and/or issues the State might have with the proposed project, the following information is requested.

1. Identify any existing and/or proposed land use plans, and identify any land use objectives which may conflict with the proposed project.
2. Identify any existing or proposed State Parks in the vicinity of the project, and identify any Park objectives which may conflict with the proposed project.

Environmental Protection Agency - epa.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

1. Identify any sole source or principal drinking water sources that may be affected by the proposed project.
2. Identify any known contaminated areas or suspected sites in the project area.
3. Identify any permits and/or clearances to be obtained from your agency for the proposed project.

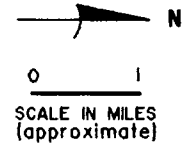
U.S. Fish and Wildlife Service - usf&ws.wcm

In addition to identifying any concerns and/or issues your agency might have with the proposed project, the following information is requested.

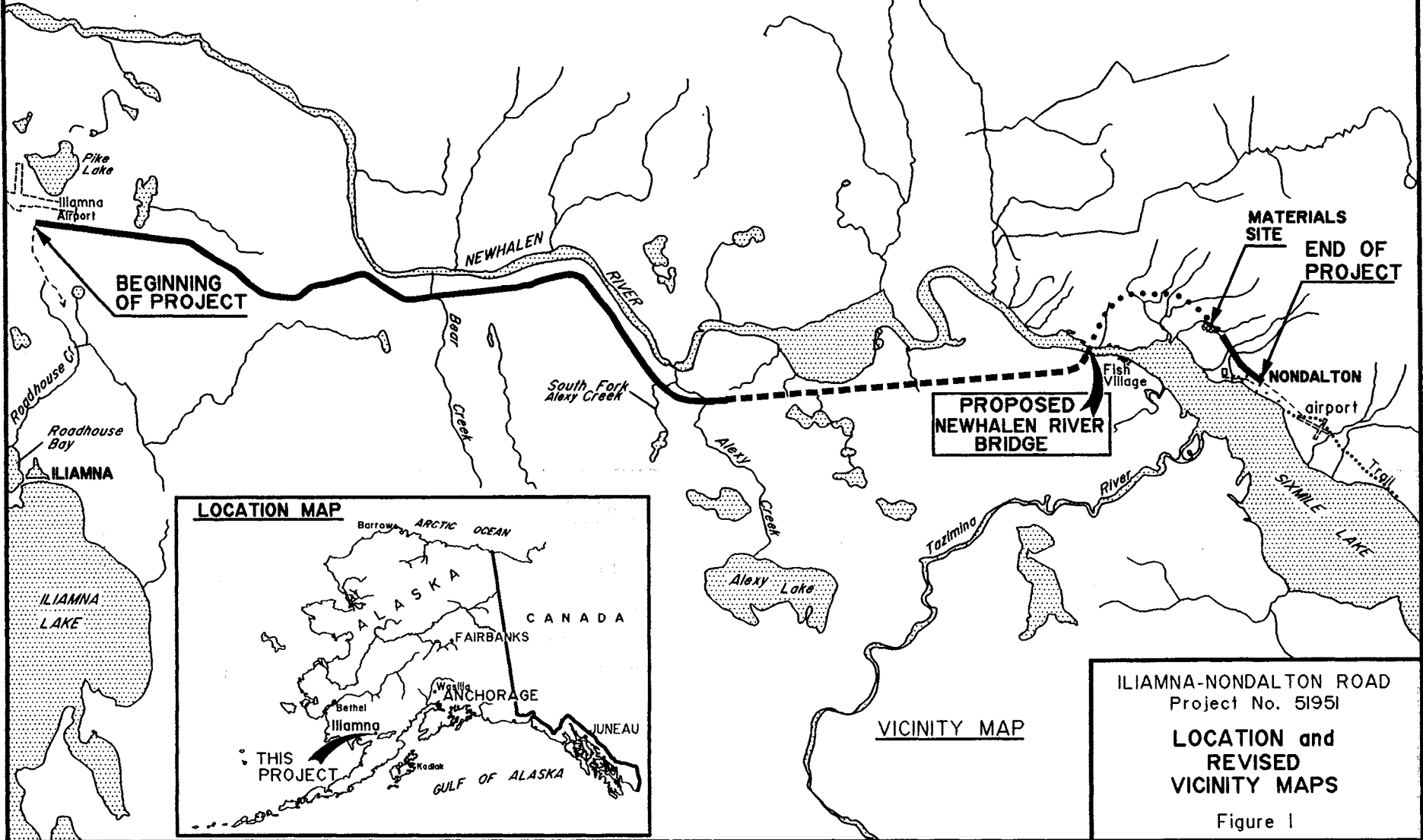
1. Any information on known threatened and/or endangered species in the project area and vicinity.
2. Any information identifying National Wildlife Refuge lands in or adjacent to the project area. If refuge lands are in the vicinity, would the normal activities occurring there be affected by the proposed project?
3. Any information or data on important fish and wildlife habitats potentially affected by the proposal.
4. Any information on known active or inactive eagle nests in the project area.
5. Identify any permits and or clearances to be obtained from your agency for the project.

LEGEND

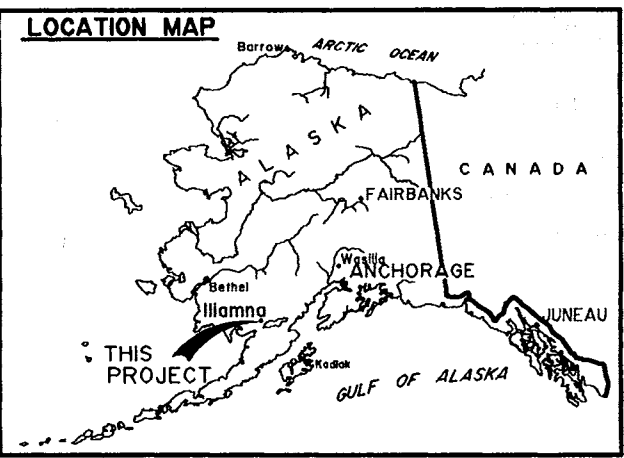
- EXISTING ROAD (resurface only)
- - - - - EXISTING ROAD (to be improved and resurfaced)
- EXISTING PIONEER ROAD/ATV TRAIL (construct to roadway standards)



to
NEWHALEN

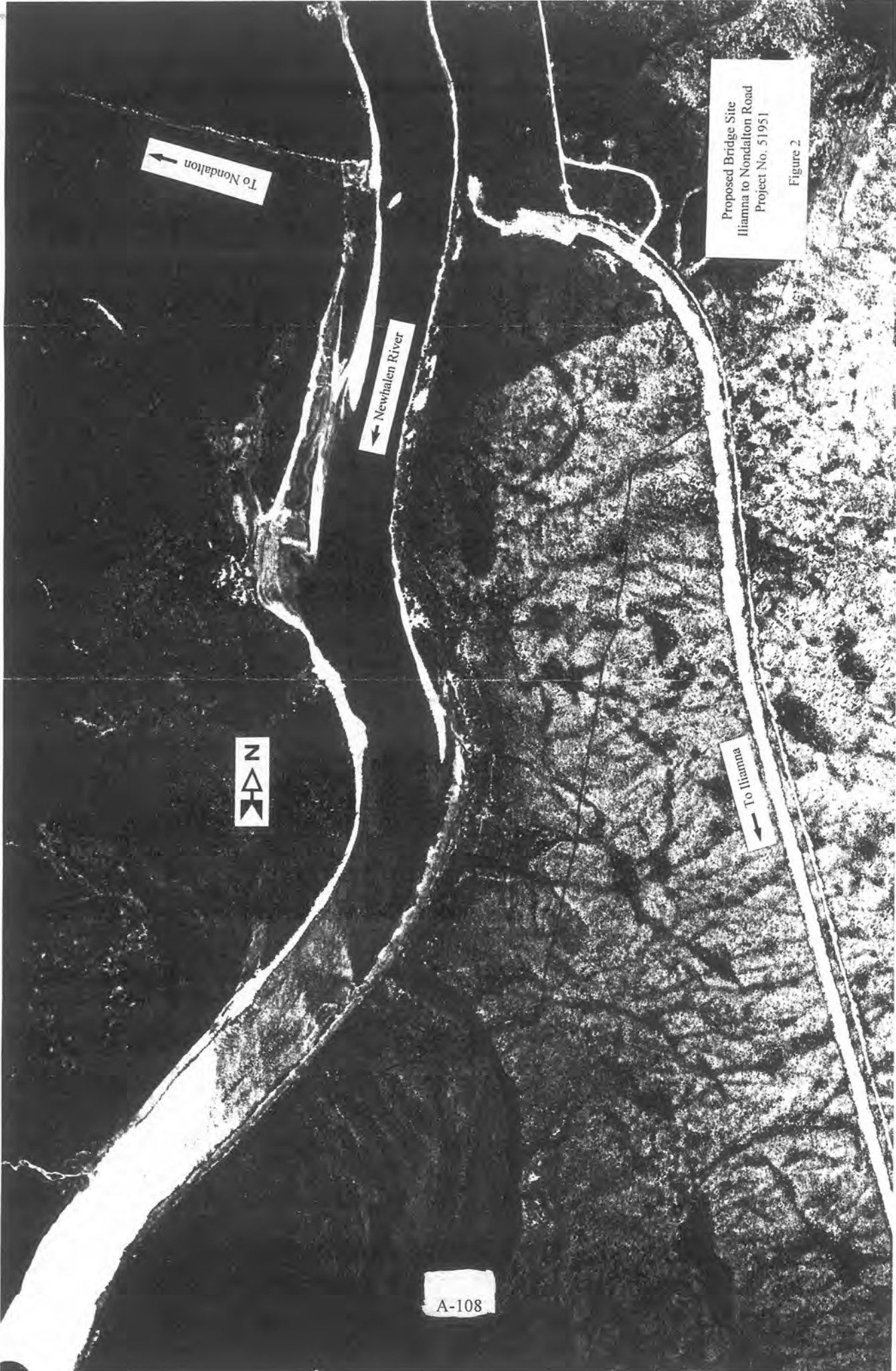


A-107



VICINITY MAP

IILIAMNA-NONDALTON ROAD
Project No. 51951
**LOCATION and
REVISED
VICINITY MAPS**
Figure 1



To Nondalton

Newhalen River

Proposed Bridge Site
Iliamna to Nondalton Road
Project No. 51951

Figure 2

To Iliamna



A-108



Frontier road to Nondalton,
looking north

Road from Iliamna -
erosion apparent at culvert



Bridge at Alexy Creek

Figure 3



Proposed bridge site -
looking down to the north



Proposed bridge site -
looking up to the south

Figure 4

**Interagency Working Agreement
Concurrence Form**

Project Description: Iliamna-Nondalton Road Improvements

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 11/26/97

Concurrence Point

Purpose & Need

Alternatives to be Analyzed

Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative by his/her signature to this document signifies one of the following:

Concurrence ¹

Nonconcurrence ²

Nonparticipation by choice ³

Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: _____

Agency

Signature

Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency ^{A-111} does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN AND ENVIRONMENTAL

TONY KNOWLES, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
(FAX) 243-6927 - TDD 269-0473
(907) 269-0528 or (907) 269-0542

February 27, 1998

Re: Iliamna-Nondalton Road Improvements
Project No. STP-0214(3)/51951
**Request for Merger Agency
Concurrence With Alternatives**

Mr. Walt Wrede
Borough Manager
Lake & Peninsula Borough
P.O. Box 495
King Salmon, AK 99613

Dear Mr. Wrede:

The Alaska Department of Transportation & Public Facilities (ADOT&PF) is continuing to solicit comments and information on a proposal to upgrade and improve overland access between the Village of Iliamna and the City of Nondalton. In accordance with the Interagency Working Agreement to Integrate Section 404 and Related Permit Requirements Into the National Environmental Policy Act (MOU) of June 6, 1996, the ADOT&PF is seeking written concurrence with this project's alternatives to be carried forward in the Environmental Assessment (EA).

During the scoping period for this project, the ADOT&PF received verbal and written comments requesting consideration of various alternatives. Enclosure 1 is a revised version of the Purpose and Need Statement previously sent to Merger Agencies on October 7, 1997. This revision is intended to further clarify the Purpose and Need Statement. Enclosure 2 describes the range of seven alternatives with corresponding avoidance, minimization and preliminary mitigation requirements.

The ADOT&PF has dismissed all but one Build Alternative. Justification for the determination to dismiss or carry alternatives forward is given in Enclosure 2. The ADOT&PF examined whether each alternative satisfies the Purpose and Need Statement; to provide safe, reliable, convenient overland access for people and cargo, at reasonable cost, between Iliamna/Newhalen and Nondalton. Within the EA, the ADOT&PF proposes to evaluate Build Alternative No. 1 (see preliminary drawings at Enclosure 3) and the No Action Alternative.

Please complete the enclosed MOU Concurrence form and return it to me by April 18, 1998. If you have any questions, or would like a copy of the Scoping Summary Report, please call Ms. Helen Lons, Environmental Analyst, at 269-0529.

Sincerely,

Susan N. Wick

Susan N. Wick
Environmental Team Leader

Enclosures:

1. Purpose and Need Statement, February, 1998
2. Range of Alternatives
3. Preliminary Drawings for Build Alternative No. 1
4. Concurrence Form

cc: Jim Bryson, Realty/Environmental Officer, FHWA
John Dickenson, P.E., Project Manager, Highway Design
Helen Lons, Environmental Analyst, PD&E
Jack Melton, Area Planner, Planning

Ms. Marianne G. See
Statewide Public Service Director
AK Dept. of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

Mr. Lance Trasky
Habitat Restoration Division
AK Dept. of Fish and Game
333 Raspberry Road
Anchorage, AK 99518

Ms. Anne Rappoport
ANC Fish and Wildlife Enhancement
U.S. Fish and Wildlife Service
605 West 4th Ave. Room 62
Anchorage, AK 99501

Mr. Ronald Morris
Supervisor
National Marine Fisheries Service
222 West 7th Avenue, #43
Anchorage, AK 99513

Mr. Larry L. Reeder
Regulatory Branch
U.S. Army Corps of Engineers
P.O. Box 898
Anchorage, AK 99506-0898

Mr. Ted Rockwell
Alaska Operations Office
U.S. Environmental Protection Agency
222 West 7th Ave., #19 (Rm.537)
Anchorage, AK 99513-7588

Mr. Gary Prokosch
Div. of Mining & Water Mgmt
Dept. of Natural Resources
3601 C Street, Suite 800
Anchorage, AK 99503-5935

Mr. Walt Wrede
Borough Manager
Lake & Peninsula Borough
P.O. Box 495
King Salmon, AK 99613

PURPOSE AND NEED STATEMENT

REVISED

The State of Alaska, the communities of Iliamna, Newhalen and Nondalton, and the Lake and Peninsula Borough have identified the general need for improving overland access between Iliamna/Newhalen and Nondalton. Concurrent with this general need are specific needs to improve public safety, improve health care/services, expand and diversify community economies, improve the supply of government services, enhance the delivery of educational services and correct or alleviate some serious environmental problems.

Improving overland access between Iliamna/Newhalen and Nondalton is the highest priority transportation improvement project of the Lake and Peninsula Borough, as well as the communities of Iliamna/Newhalen and Nondalton. A well traveled, but substandard gravel road suitable for cars, trucks, and heavy equipment exists from Iliamna/Newhalen to the bridge-crossing site at the Newhalen River. A lesser pioneer road/ATV trail exists from the crossing site to Nondalton. Some portions of the road/trail cross Alaskan Native Corporation property because the road clearing has overgrown. The purpose of this road improvements project is to provide safe, reliable, convenient overland access for people and cargo, at reasonable cost, between Iliamna/Newhalen and Nondalton. This project would meet the following needs to the greatest extent that is practical:

There is a need to improve local public safety. A transportation system is needed that will provide less reliance on air transportation between Iliamna/Newhalen and Nondalton. Small aircraft transportation has a much higher death and injury rate per passenger than surface transportation. Therefore, the opportunities and likelihood of serious injuries and accidental deaths resulting from air travel between Iliamna/Newhalen and Nondalton needs to be lessened. Currently, overland winter travel between Iliamna and Nondalton is possible, but hazardous, across the frozen Newhalen River and Six Mile Lake. During the winter of 1988, two snowmachine riders drowned after falling through the ice near Nondalton. With reliable access across the Newhalen River, safer overland transportation, especially during periods of inclement

weather, reduced visibility, and unstable river ice conditions, would become the preferred method of travel. Also, police protection response times need to be enhanced between Iliamna/Newhalen and Nondalton, and fire protection response needs to be initiated between these communities.

Improvements in health care/services are needed. The difficulty and expense of getting critically ill or injured people out of Nondalton in an emergency must be lessened. This need is most urgent in the event of a major disaster such as a fire. A transportation system is needed that will enable the sharing of facilities, expertise and equipment. As an example, there is a need for a 10 bed hospital in Iliamna and an elders home in Nondalton. Improved overland access would permit such facilities to provide services to all the residents of Iliamna/Newhalen and Nondalton.

The economies of Iliamna/Newhalen and Nondalton need to be expanded and diversified. The cost of goods in these communities needs to be lowered. Currently, Nondalton is the largest community in the Lake and Peninsula Borough, but it is relatively isolated and offers very few job opportunities. This economic problem has been exacerbated in recent years due to the commercial fishing crisis in the Bristol Bay area. Currently, approximately 50% of the Nondalton potential workforce is unemployed. With an overland transportation link between Nondalton and Iliamna/Newhalen, the customer base for local businesses would effectively be doubled. This would give Nondalton residents the ability to take advantage of a greatly expanded range of employment opportunities. Improved overland access would also permit reduction in costs to passengers and freight carriers between Iliamna/Newhalen and Nondalton. Currently, 25-33% of materials costs in Nondalton are estimated to be directly attributable to flight costs. Further, a reliable transportation link across the Newhalen River is needed to provide year-round accessibility for heavy equipment for construction work on both sides of the Newhalen River. At present, low water conditions, as well as permit considerations, limit the potential river crossings for such equipment to approximately once each year. In essence, the secondary economic benefits that would be derived from improved overland access are needed to increase trade and commerce between Iliamna/Newhalen and Nondalton.

Supply of government services to the residents of these communities needs to become more efficient and convenient. Government facilities at all levels could be consolidated at one place on the transportation system rather than being spread out among several communities. At present, the Tazimina Hydroelectric Project provides power for the villages of Iliamna, Newhalen, Nondalton and Kokhanok. For the leg to Nondalton, a power line from this project parallels a portion of the existing road between Iliamna to its terminus at the Newhalen River, where it then crosses under the river and continues on to Nondalton. There is a need for reduced transportation costs in order to maintain this portion of power line. Further, the underwater portion of this utility connection is plagued by many power outages. A transportation system is needed across the river that would permit this portion of the power line to cross the Newhalen River above water, alleviating this problem.

There is a need to enhance the delivery of educational services to the communities of Iliamna/Newhalen and Nondalton. The school district needs to improve its ability to transport supplies, materials, students and personnel between Iliamna/Newhalen and Nondalton. The overland access improvements would not only reduce costs but would also increase the safety of students and staff who travel regularly between these communities. The school district needs options in providing enhanced secondary programs to students in Newhalen and Nondalton where student populations are not large enough to warrant the diversity of curriculum that could be made available if certain classes were consolidated. Improved transportation services are also needed to provide students from both schools with enhanced competition opportunities in sports activities.

There is a need to correct, or alleviate some serious environmental problems, which presently exist:

First, it is now necessary to drive vehicles and heavy equipment across the Newhalen River (a world class salmon and rainbow trout resource) to access the other side. As an example, the

ADF&G has issued the City of Nondalton permits to drive its heavy equipment across the river so it can maintain the remainder of the road to Iliamna. A reliable transportation link across the river is needed to reduce tundra scarring along routes leading to, and from, currently used equipment river crossing points. Disturbance of fish habitat, caused by driving vehicles across the river bed, needs to be prevented.

Second, the existing road has some engineering and design problems and is not as well maintained as it would be if the link between Nondalton and Iliamna were complete. This situation results in unnecessary environmental damage along the road corridor. For example, there is serious erosion taking place at various points along the road and at the steep bank to the Newhalen River at the terminus of the road from Iliamna. The steep bank is at a primary site used to beach skiffs used for transit of the Newhalen River. The erosion problem at the steep bank is aggravated by people climbing up and down the grade and by wave action from the numerous skiffs which cross the river at this point. The road also has drainage problems in certain areas. This frequently results in large sections of the road becoming impassable due to mud. During these periods, vehicles attempt to drive around the poorly drained areas which causes the footprint of the road to become wider and wider and results in unnecessary damage to the adjacent tundra. There is a need to alleviate these problems.

Third, the current method of getting a significant portion of the fuel to the community of Nondalton, in addition to being a hardship for its residents, represents a serious threat to the environment. The Nondalton Airport length of runway limits cargo aircraft that can currently use the runway. Further, fuel cannot be transported overland from the Iliamna airport or dock to Nondalton because there is no bridge across the Newhalen River. As a result, Nondalton residents often get their fuel in Iliamna, transport it by road to a place along the river several miles below the proposed bridge site known as "the landing" and then transport the fuel by skiff in 55 gallon drums up the river and across Six Mile Lake to Nondalton. The environmental risks associated with this complex mode of transporting fuel are significant. There is a need for a reliable, safe transportation link across the river to alleviate these problems.

Fourth, there currently exists a need for improved refuse disposal at Iliamna/Newhalen and Nondalton. A reliable transportation link across the Newhalen River is needed to permit construction of a proposed consolidated landfill to service the communities of Iliamna/Newhalen and Nondalton.

In addition to the foregoing needs, a secondary benefit of this project would be to provide more infrastructure to accommodate growth of mid-market tourism in Iliamna/Newhalen and Nondalton. The Alaska Department of Fish and Game (ADF&G) reports the current growth in angler days at between seven and 11 percent per year in this general area. Air taxi operators report similar growth rates for their operations during the summer and fall. Many other signs and statistics point to an increase in the utilization of the area. Iliamna is a favorite destination for recreational fishing on the Newhalen River and Nondalton is the largest community in the vicinity of Lake Clark National Park. This project would enhance cultural and non-consumptive tourism in the area.

In conclusion, the long history of study and number of endorsements for improving the overland access between Iliamna/Newhalen and Nondalton demonstrates the need for this project. The purpose of this project is to meet those needs to the greatest extent that is practical.

ILIAMNA-NONDALTON ROAD IMPROVEMENTS
Project No. STP-0214(3)/51951

RANGE OF ALTERNATIVES

BACKGROUND

The ADOT&PF originally developed two alternatives; the proposed Road Improvements and Bridge Alternative (Build Alternative No. 1) and the No Action Alternative. As discovered during scoping, the public desired consideration of additional alternatives. In response, the ADOT&PF examined options for crossing the Newhalen River by ferry, tram and floating bridge. These latter three alternatives (Nos. 3, 4, and 5) include all of the road improvements described in Build Alternative No. 1. However, to avoid repetition, discussion of the road improvements is presented only in Build Alternative No. 1 below. Also considered were alternatives for completing only the road improvements or the bridge construction. For all Build Alternatives, the ADOT&PF and its contractors would employ stormwater pollution prevention plans, oil and hazardous substance spill prevention measures and erosion control best management practices. Justification is given for each alternative dismissed.

BUILD ALTERNATIVES

1. Road Improvements and Bridge Alternative
--

Description: This alternative would (1) resurface, restore and rehabilitate the existing approximately 14.4 mile roadway from Iliamna to the Newhalen River, (2) construct an approximately 653 foot long, 18.67 foot wide, one-lane, steel girder bridge across the Newhalen River, approximately 20 miles above the mouth and (3) construct the approximately 1.7 mile pioneer road/ATV trail (from the River to the end of the approximately 1.4 mile improved road leading to Nondalton) to meet current roadway standards.

The completed roadway would be approximately 20-feet wide, gravel surfaced, with two traffic lanes. The existing road profile would be re-established. Traffic lanes would be re-established within the legal right-of-way. The section of roadway south of Alexcy Creek to the Iliamna airport on the east side of the Newhalen River would receive the least upgrades.

Drainage problems, such as side cutting at low spots around culverts and muddy sections, would be corrected to bring the road into accordance with the ADOT&PF standards. The project would include installation and repair of existing culverts where necessary. Slopes would be stabilized around existing culverts above the high water mark of Bear and Lovers Creeks.

The bridge over the Newhalen River would be a one-lane, one-way bridge, 653 feet long, with a 14 foot travel way and a 18.67 foot overall width. The proposed one-lane bridge superstructure would consist of 4 steel stringers supporting precast concrete deck panels. A cast-in-place concrete curb would support the metal bridge railing. No asphalt overlay is planned at this time. The bridge would be supported by five piers spaced about 118 feet apart. Each pier would consist of three 30 inch diameter steel pipe piles. Four of the five piers would be placed below the ordinary high water elevation.

Impacts: The proposed project would be mainly confined to the existing roadway corridor and, therefore, would have minimal effect on the biological environment. No relocation of existing structures or uses would be necessary to improve the existing roadway. Slope stabilization around existing culverts would take place above the ordinary high water line of Alexcy Creek, Bear Creek and Lovers Creek.

The placement of bridge piers could negatively affect aquatic habitat. Bridge presence would impact the visual qualities of the environment.

Road improvements would involve placement of fill in less than 4.25 acres of wetlands, based upon an October 3, 1996 Army Corps of Engineers on-site wetlands survey. It is anticipated that the ADOT&PF would apply for a Nationwide permit for roadway creek crossings and a Section 10 permit for the Newhalen River bridge crossing.

Under contract with the ADOT&PF, the Department of Natural Resources Office of History and Archaeology conducted a reconnaissance level cultural resources survey on September 10-11, 1996, of the 1.7 mile segment of the corridor between the material site just southwest of Nondalton and the Newhalen River. The State Historic Preservation Officer found that there are no cultural resource properties in the project area and issued a finding of No Effect on October 18, 1996.

Temporary degradation of air quality may occur during construction. Temporary traffic delays are expected during the construction. Materials required for construction would be obtained from excavation and an existing upland materials source located near Nondalton. The American Peregrine Falcon may migrate through this area, however, the U.S. Fish & Wildlife Service states that this project should not impact the species.

The continuous road system would have a positive impact to the residents of the area and promote social interaction. No adverse economic impacts would occur from the proposed project. The road connection would enable the communities of Newhalen, Iliamna and Nondalton to combine their resources and develop cooperative facilities that would mutually and economically benefit area residents. A roadway connection would reduce freight costs for residents who would otherwise be required to transport goods by air or a combination of vehicle and boat haul.

The Secondary and Cumulative Impacts Study, completed in January, 1996 substantiates the finding that no secondary and cumulative impacts would be of a significant level. The project would result in beneficial secondary impacts to all of the examined impact categories; environment, public safety and health, economics, government, education, transportation, lands, utilities, and tourism. Expected cumulative impacts would be minor on government, minor on social trends and none on Pebble Beach Mine development. The visual environment and fish/wildlife resources would incur no meaningful cumulative impacts. Likewise, tourism development would not likely incur any cumulative effects from the project.

Avoidance, minimization and preliminary mitigation requirements: The Contractor would be required to obtain the material from a permitted or upland source. All material used in roadway construction would be free of contaminants.

The ADOT&PF would apply for resource agency permits and adhere to applicable conditions required by those permits. Such conditions may involve in-water work windows and techniques, wetland mitigation, erosion controls and bridge and bridge access design specifications. Such permits may include a U.S. Army Corps of Engineers Section 404/10 for wetland fill, coverage under the EPA/Alaska General NPDES Permit for stormwater pollution, a U.S. Coast Guard Title 9 Bridge Permit, an ADF&G Title 16 Fish Habitat Permit and a Lake and Peninsula Borough Development Permit.

Under the NPDES permit, a Stormwater Pollution Prevention Plan (SWPPP) would be submitted by the Contractor for Department approval prior to construction. Best Management Practices, described in detail in the site-specific SWPPP, would be employed to minimize erosion to areas within and surrounding the project site. The bridge approaches would be designed to prevent stormwater runoff from being directed into the river.

Temporary degradation of air quality would be minimized by proper maintenance of machinery/equipment. In the event that hazardous waste is encountered during construction, all work in the area would be stopped and the Alaska Department of Environmental Conservation would be contacted.

Determination to Carry Alternative Forward: The ADOT&PF has determined that this alternative satisfies the Purpose and Need for the project and is a reasonable option to evaluate in the EA. It would provide a reliable, safe, convenient transportation route with low maintenance requirements.

2. Road Improvements Without Bridge Alternative

Description: The road would be improved, as described in Build Alternative No. 1. However, no bridge would be built over the Newhalen River. Travel would be restricted, as it currently exists, at each side of the river.

Impacts: See impacts associated with road improvements in Build Alternative No. 1. Note: Without a bridge, there would be no bridge-related impact to the aquatic habitat or the visual environment.

Avoidance, minimization and preliminary mitigation requirements: See discussion at Build Alternative No. 1.

Determination to Carry Alternative Forward: The ADOT&PF has determined that this alternative does not satisfy the Purpose and Need Statement since it does not provide overland access between Iliamna and Nondalton. Therefore, it will not be explored in the EA.

3. Ferry Alternative

Description: This alternative would provide a scheduled boat crossing service for vehicles and pedestrians across the Newhalen River. If the ferry operated at the proposed bridge site described in Build Alternative No. 1, service could occur most of the year. The ferry would be large enough to accommodate one bus or one grader, providing service for school functions and road maintenance. Up to three cars could fit on the same ferry. Boat docks would be needed to be built on each side of the river to accommodate passenger and vehicle loading operations. The ferry would require maintenance and oversight year-round. Full time, year-round employment for one ferry boat captain and one crew member would be required.

Impacts: This alternative would require a substantial amount of disturbance along the Iliamna side of the Newhalen River, as the bank would need to be deeply excavated to provide safe road access. Docks, parking areas and access driveways would need to be built on both sides of the river. A switchback road, requiring acquisition of additional right-of-way, would be needed on the Iliamna side for vehicles to negotiate the large elevation differential between the river and the existing roadway. Ferry operation would involve a high risk of oil and fuel spillage. Fish habitat would be disrupted with the ferry's operation as a result of churning waters, noise, vibration and bank erosion. This alternative would impair the existing qualities of the visual environment.

Avoidance, minimization and preliminary mitigation requirements: To avoid substantial impacts to the river bank on the Iliamna side, the ferry terminus could be built further upstream at a lower elevation. However, this would require the acquisition of additional right-of-way from adjacent Native Corporations and private individuals. It would also increase the distance of the ferry route, since the water body crossing widens to the north. Spill prevention and response measures could be taken to protect the ecosystem from fuel spills. To minimize ferry operation impacts, the ferry could be fitted with a low-noise, low-speed engine and anti-pollution devices.

Determination to Carry Alternative Forward: The ADOT&PF has determined that this alternative does not satisfy the Purpose and Need for the project. It may provide reliable, safe overland access between Iliamna and Nondalton, but it would be inconvenient. It would also be noisy, expensive and create an unnecessary risk of anadromous stream pollution. Therefore, this alternative will not be explored in the EA.

4. Tram Car Alternative

Description: A tram car system could be built at the same site as the proposed bridge in Build Alternative No. 1. A cable car would traverse the river by a pulley system operated mechanically by an operator stationed at one of the tram termini. The tram car could be enclosed with glass for occupants' safety and protection from weather. The one car and one set of pulleys would allow pedestrian traffic to access both sides of the river; one direction at a time. The tram car capacity could be approximately four to eight people; no provision would be made for hauling cargo other than light loads accompanying the passengers. Tram car operation could be year-round. Regular maintenance and inspections would be required on the tram car and pulley system. Full-time employment would be required for one tram car operator.

Impacts: Compared to other Build Alternatives, this alternative would require less river bank excavation and alteration for installing the terminal points of the facility. However, parking area construction would cause habitat destruction and required acquisition of additional right-of-way. River navigation would be impacted from the reduction in vertical clearance caused by the tram's stationary overhead cables. With steady use by pedestrians, riverbank pathways would become eroded, contributing to river siltation. Users would need access to two vehicles; one to take to the bridge site and another on the opposite bank. This alternative would cause visual impacts to the surrounding area.

Avoidance, minimization and preliminary mitigation requirements: Pathways and terminus points could be constructed with landscaping and maintained regularly to reduce erosion and siltation. Parking area size could be minimized. A high quality mechanical system could be installed, resulting in little noise or oil pollution impacts. Cables could be erected high enough to allow greater vertical clearance for a boat navigation lane. The cables could be positioned to minimize the span, thus reducing visual impacts.

Determination to Carry Alternative Forward in the EA: The ADOT&PF determined that this alternative does not satisfy the Purpose and Need for the project. Even though it would provide continuous, safe, reliable overland access between Iliamna and Nondalton, it would be inconvenient. Passenger capacity would be very limited. Consequently, the ADOT&PF dismissed this alternative.

5. Floating Bridge Alternative

Description: A one-lane floating bridge, placed at the same site as the proposed bridge in Build Alternative No. 1, could accommodate both pedestrian and vehicular traffic. Excavation requirements on the Iliamna side of the Newhalen River would be similar to that of the ferry alternative. Abutments would need to be buried in the river banks and pilings buried in the riverbed to support the bridge sections. No parking areas would be needed at either side of the river, since vehicles and pedestrians would cross over to the other side, instead of waiting for a ferry or tram to become available. Operation and maintenance could be done year-round.

Impacts: Floating debris and ice chunks would jam against the sides of the floating bridge, risking damage to both the bridge structure and river habitat. Boat navigation would be completely obstructed, since the bridge would float across the entire river width. Small boat operators would try to negotiate around the termini by portaging, but would risk trespassing on Native Corporation lands and cause riverbank erosion. Variations in water movement caused by the bridge presence could negatively affect aquatic habitat.

Avoidance, minimization and preliminary mitigation requirements: Nothing could be done to relieve obstruction to navigation beyond the bridge. Bridge design could be kept to a minimum width, with flexible horizontal movement to reduce impacts to aquatic habitat. Non-toxic construction materials could be used to protect aquatic life. Maintenance and inspections could be done more frequently during periods of water level changes and break-up.

Determination to Carry Alternative Forward in the EA: The ADOT&PF determined that this alternative does not satisfy the Purpose and Need for the project. Even though it would provide a safe, convenient overland transportation route between Iliamna and Nondalton, it would be unreliable. It would require a high level of maintenance and inspection effort over the long term. Subjected to natural freeze/thaw events, it would pose an unreliable transportation route at some times of the year. Consequently, the ADOT&PF dismissed pursuing this alternative in the EA.

6. Bridge Without Road Improvements Alternative

Description: A span bridge with one travel lane width, as described in Build Alternative No. 1, would be constructed across the Newhalen River. No improvements to the existing roadway between Iliamna airport and Nondalton would be done.

Impacts: See impacts associated with the bridge in Build Alternative No. 1. Also, the bridge may attract more vehicular traffic, exacerbating roadway erosion problems and further widening the footprint.

Avoidance, minimization and preliminary mitigation requirements: See discussion at Build Alternative No. 1.

Determination to Carry Alternative Forward in the EA: The ADOT&PF determined that this alternative does not satisfy the Purpose and Need for the project. Roadway accessibility would be limited by the sub-standard conditions of the ATV trail section and uncorrected muddy areas. Current roadway erosion and siltation problems would not be addressed. The route would be unsafe, unreliable and inconvenient. Because of these deficiencies, the ADOT&PF decided not to pursue this alternative in the EA.

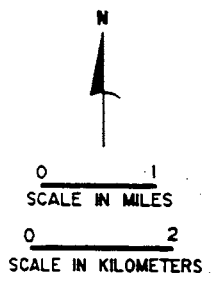
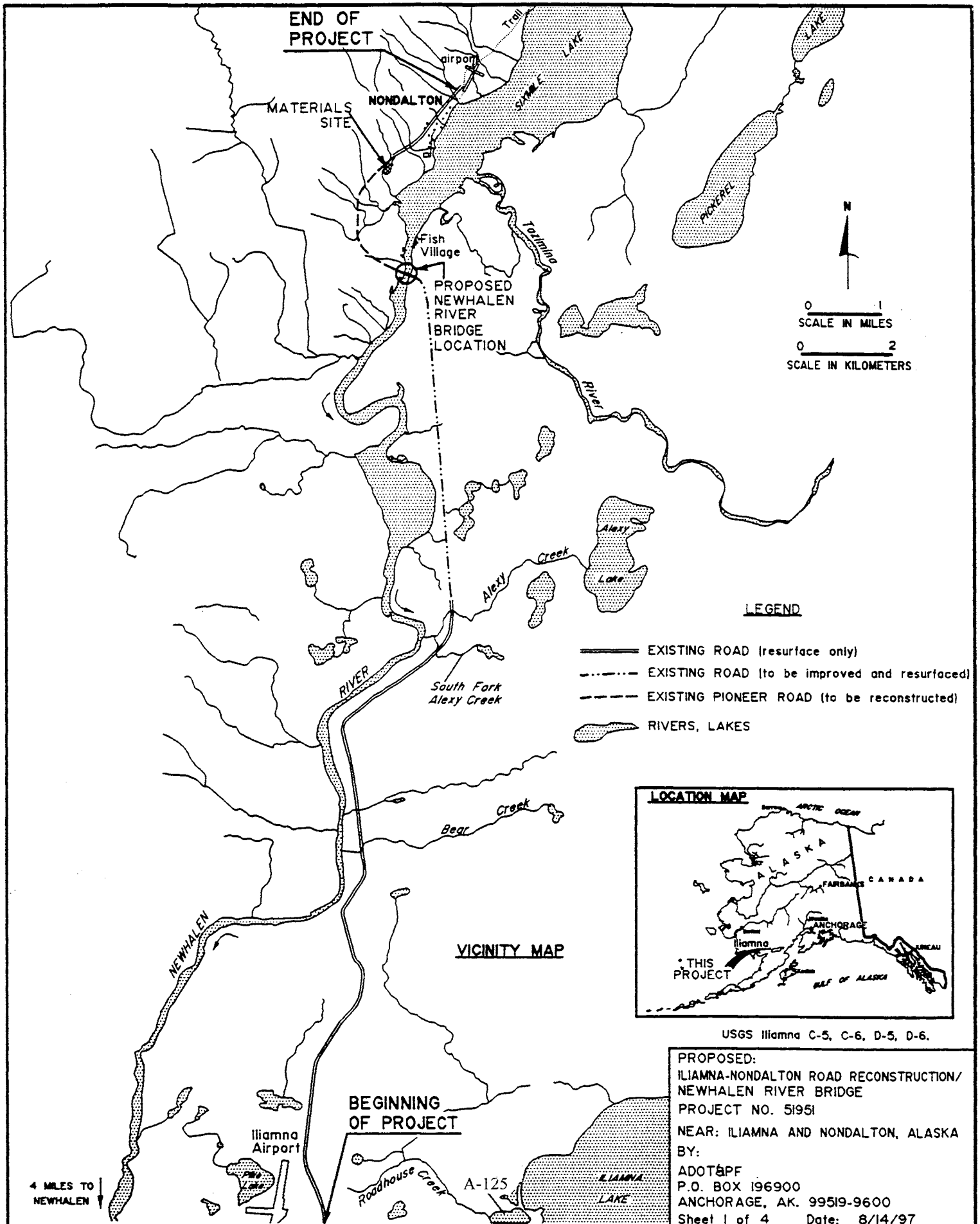
NO-ACTION ALTERNATIVE

Description: Under the No-Action Alternative, the existing roadway would remain unchanged with no improvements from construction activities. This alternative would not upgrade the existing roadway and would continue the current minimal level of road maintenance. No overland road connection between Iliamna and Nondalton would be provided.

Impacts: Traffic would continue to drive off-road to bypass muddy or difficult sections of the roadway, widening the roadway footprint. No wetland fill or resulting wetland impacts would be required for construction. However, water quality impacts would increase, due to erosion from deterioration of the existing roadway surfaces, culverted areas and riverbanks.

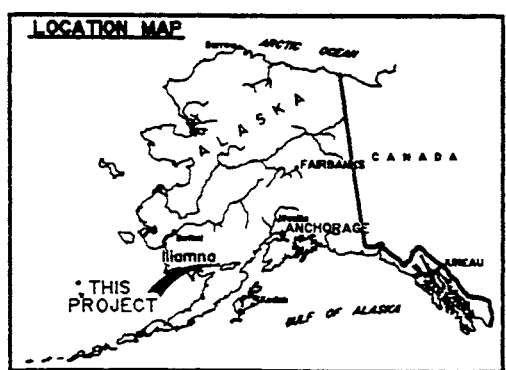
Avoidance, minimization and preliminary mitigation requirements: This alternative has none.

Determination to Carry Alternative Forward in the EA: The ADOT&PF will explore this alternative in the EA.



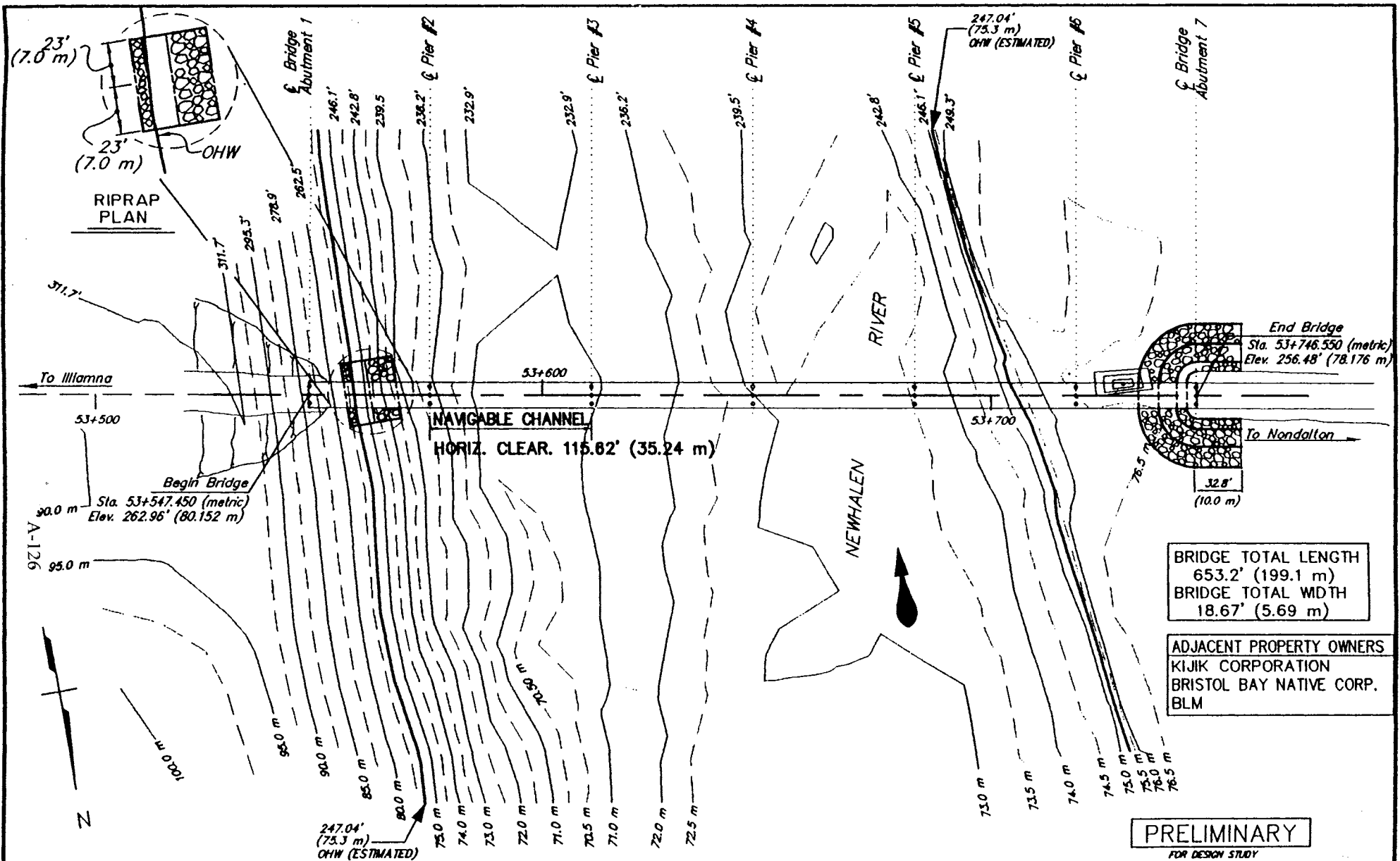
LEGEND

- EXISTING ROAD (resurface only)
- - - EXISTING ROAD (to be improved and resurfaced)
- - - EXISTING PIONEER ROAD (to be reconstructed)
- RIVERS, LAKES



USGS Iliamna C-5, C-6, D-5, D-6.

PROPOSED:
 ILIAMNA-NONDALTON ROAD RECONSTRUCTION/
 NEWHALEN RIVER BRIDGE
 PROJECT NO. 51951
NEAR: ILIAMNA AND NONDALTON, ALASKA
BY:
 ADOT&PF
 P.O. BOX 196900
 ANCHORAGE, AK. 99519-9600
 Sheet 1 of 4 Date: 8/14/97



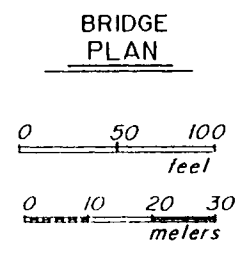
BRIDGE TOTAL LENGTH
653.2' (199.1 m)
BRIDGE TOTAL WIDTH
18.67' (5.69 m)

ADJACENT PROPERTY OWNERS
KIJIK CORPORATION
BRISTOL BAY NATIVE CORP.
BLM

PRELIMINARY
FOR DESIGN STUDY

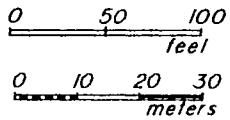
HYDRAULIC & HYDROLOGIC SUMMARY						
	ENGLISH			METRIC		
Recurrence Interval	$Q_{2.33}$	Q_{50}	Q_{100}	$Q_{2.33}$	Q_{50}	Q_{100}
Exceedance Probability	0.43	0.02	0.01	0.43	0.02	0.01
Drainage Area:	3,500 sq. miles			906,496 hectares		
Design Discharge	25,084 cfs	41,282 cfs	44,708 cfs	710 cms	1,169 cms	1,266 cms
Design High Water Elevation	247.04'	250.33'	250.98'	75.3 m	76.3 m	76.5 m
Minimum Clearance (Span 2)	14.27'	10.99'	10.33'	4.35 m	3.35 m	3.15 m

Datum = MSL

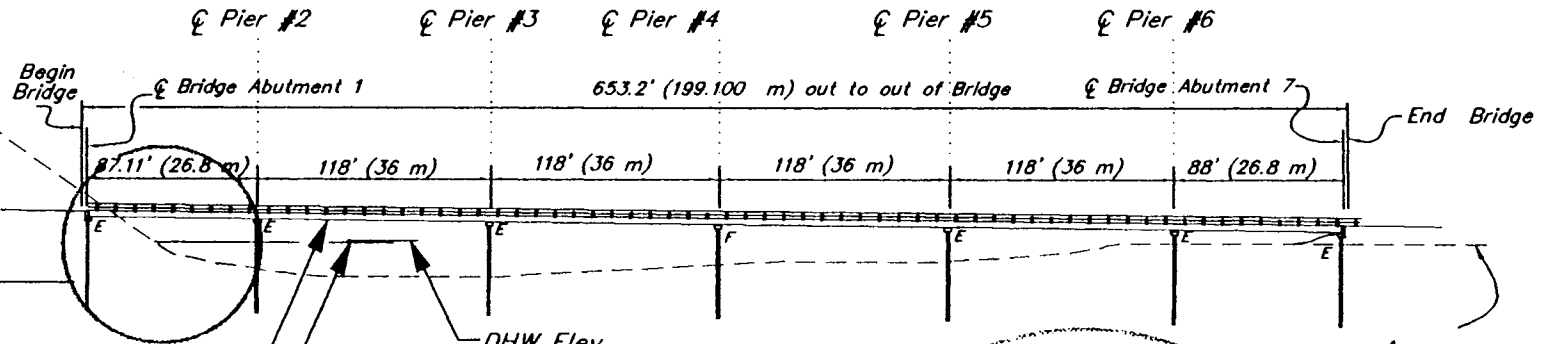


PROPOSED:
ILIAMNA-NONDALTON ROAD RECONSTRUCTION/
NEWHALEN RIVER BRIDGE
PROJECT NO. 51951
NEAR: ILIAMNA AND NONDALTON, ALASKA
BY:
ADOT&PF
P.O. BOX 196900
ANCHORAGE, AK. 99519-9600
Sheet 2 of 4 Date: 8/14/97

BRIDGE ELEVATION



Datum (MSL) = 229.6' (70.0 m)



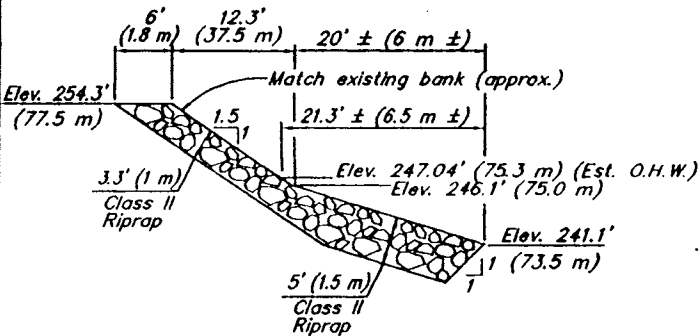
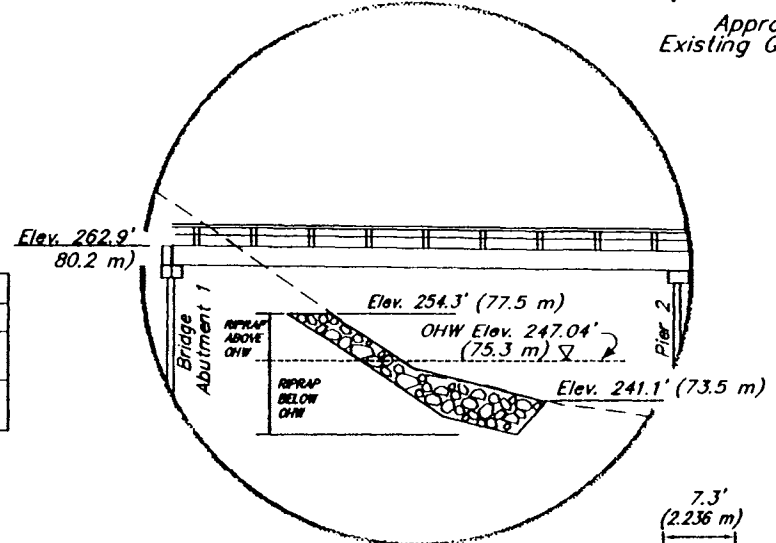
Approx. Existing Groundline

SPAN #2

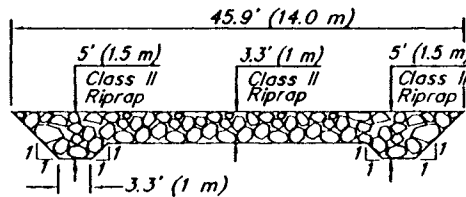
NAVIGABLE CHANNEL
 HORIZ. CLEAR. 115.62' (35.24 m)
 VERT. CLEAR. AT Q_{2.33} 14.27' (4.35 m)
 LOW CORD ELEVATION
 261.32' (79.65 m)

DHW Elev. 250.33' (76.30 m)
 OHW Elev. 247.04' (75.30 m)
 ESTIMATED, NOT SURVEYED

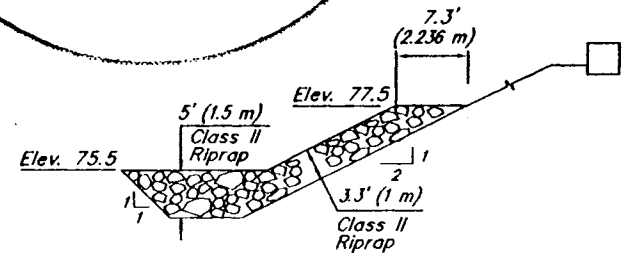
Abutment 1	
Fill Volume	0.0 CY
Riprap Volume Above OHW	19.7 CY
Riprap Volume Below OHW	136.0 CY



RIPRAP DETAIL @ ABUTMENT 1



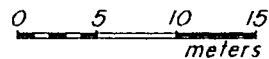
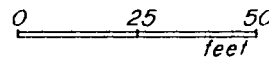
RIPRAP SECTION PERPENDICULAR TO FACE ABUTMENT 1



RIPRAP DETAIL @ ABUTMENT 7

SITE CONDITIONS		
	ENGLISH (ft.)	METRIC (m)
Minimum Channel Elevation	231.95	70.70
Low Cord Elevation @ Span 2	261.32	79.65
Width Face to Face of Piers @ Span 2	115.62	35.24

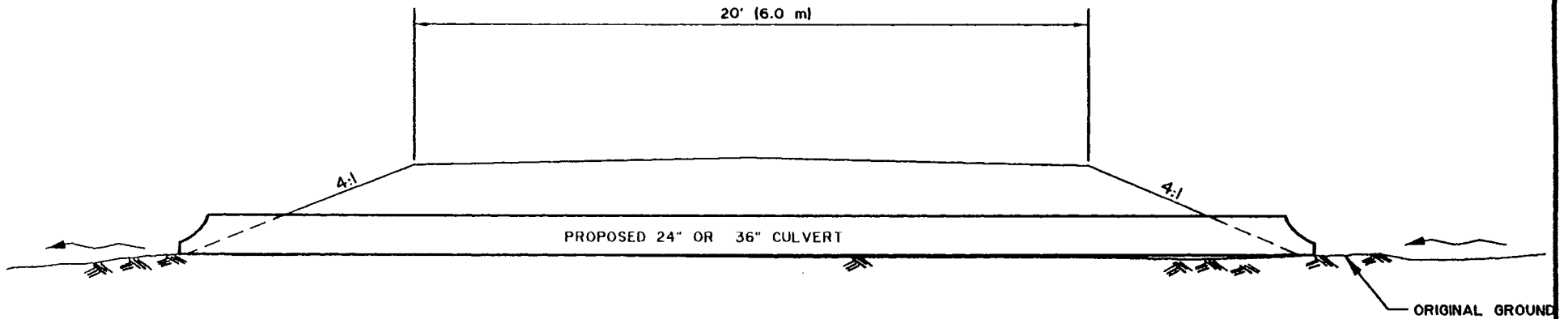
Datum = MSL



PRELIMINARY
 FOR DESIGN STUDY

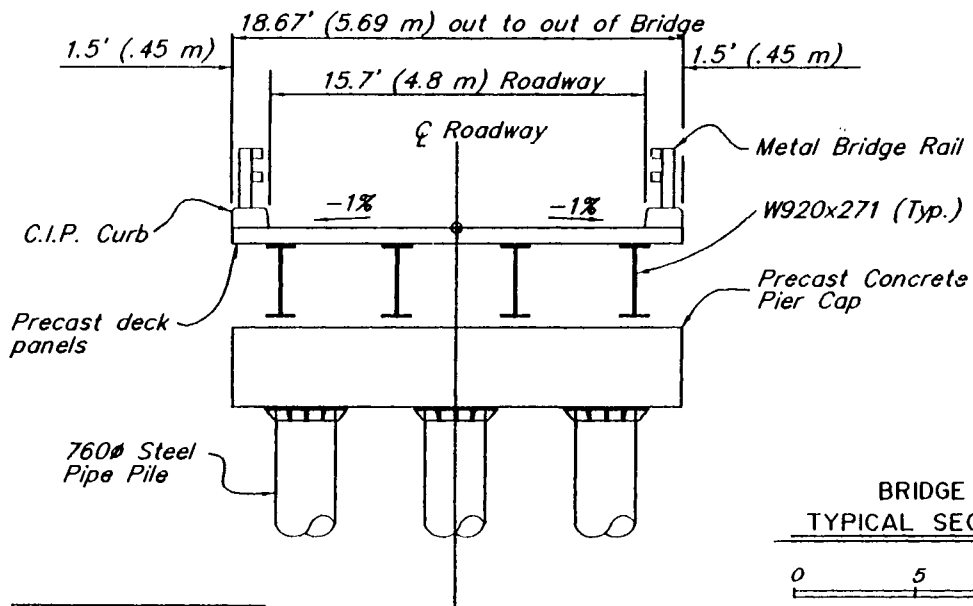
PROPOSED:
 ILIAMNA-NONDALTON ROAD RECONSTRUCTION/
 NEWHALEN RIVER BRIDGE
 PROJECT NO. 51951
 NEAR: ILIAMNA AND NONDALTON, ALASKA
 BY:
 ADOT&PF
 P.O. BOX 196900
 ANCHORAGE, AK. 99519-9600
 Sheet 3 of 4 Date: 8/14/97

A-127

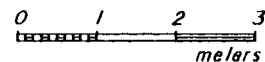
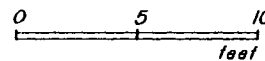


TYPICAL SECTION OF PIONEER ROAD IMPROVEMENT
NOT TO SCALE

A-128



**BRIDGE
TYPICAL SECTION**



PRELIMINARY
FOR DESIGN STUDY

PROPOSED:
ILIAMNA-NONDALTON ROAD RECONSTRUCTION/
NEWHALEN RIVER BRIDGE
PROJECT NO. 51951
NEAR: ILIAMNA AND NONDALTON, ALASKA
BY:
ADOT&PF
P.O. BOX 196900
ANCHORAGE, AK. 99519-9600
Sheet 4 of 4 Date: 8/14/97

Interagency Working Agreement Concurrence Form

Project Description: Diamna-Nondalton Road Improvements

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 4/18/98

Concurrence Point

Purpose & Need

Alternatives to be Analyzed

Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

Concurrence ¹

Nonconcurrence ²

Nonparticipation by choice ³

Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: _____

Agency

Signature

Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency ^{A-129} does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN AND ENVIRONMENTAL

TONY KNOWLES, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
(FAX) 243-6927 - TDD 269-0473
(907) 269-0528 or (907) 269-0542

July 14, 1999

Re: Iliamna-Nondalton Road Improvements
Project No. STP-0214(3)/51951
Essential Fish Habitat

Matthew Eagleton
National Marine Fisheries Service
222 W. 7th Ave., #43
Anchorage, AK 99513-7577

Dear Mr. Eagleton:

This is a follow-up of our conversation last week when I notified you that the Alaska Department of Transportation & Public Facilities is preparing an Environmental Assessment under the existing NEPA/404 merger agreement process for the Iliamna-Nondalton Road Improvements project. The project would 1) resurface and rehabilitate the 14.4 mile roadway from Iliamna to the Newhalen River, 2) construct an approximately 653 foot long, 19 foot wide one-lane bridge over the Newhalen River, and 3) improve approximately 1.7 miles of roadway from the Newhalen River to the road leading to Nondalton. Road improvements would include reconstruction of the road base, resurfacing, installation of culverts where necessary, and embankment stabilization to prevent and arrest erosion.

Since our agency scoped this project prior to the Department of Commerce's Essential Fish Habitat consultation regulations we are writing to inform you that our project may affect essential fish habitat. Soon we will be submitting the preliminary draft Environmental Assessment for review by the merger agencies prior to seeking approval to distribute to the public. Included in that document is a draft Essential Fish Habitat Assessment.

If you have any questions regarding this project please don't hesitate to call me at 269-0530.

Sincerely,



Susan N. Wick
Environmental Team Leader

July 15, 1999

Re: Iliamna-Nondalton Road Improvements
Project No. STP-0214(3)/51951
Preliminary Draft EA

Name
Agency
Address
City, AK Zip

Dear :

The Department of Transportation & Public Facilities is transmitting for your review the preliminary draft Environmental Assessment for the Iliamna-Nondalton Road project. This is in keeping with the NEPA /404 Merger Agreement, which encourages participating agencies to comment on the preliminary draft EA before the draft EA is formally approved for public circulation.

The last opportunity the merger agencies had to review this project was during the "Alternatives to be Analyzed" concurrence point. And prior to that was the "Purpose and Need" concurrence point. Now we are requesting concurrence on the "Preferred Alternative".

We request you submit your comments on the preliminary draft EA and return the Preferred Alternative concurrence form by September 6, 1999. However, as always, earlier submittal of comments would be appreciated. If you have any questions please contact Susan Wick, Environmental Team Leader at 269-0530.

Sincerely,

Jerry O. Ruehle
Environmental Coordinator

Enclosures: Preliminary draft EA
Preferred Alternative concurrence form

**Preliminary Draft EA Mailing List
Iliamna-Nondalton Road Improvements
Project No. STP-0214(3)/51951**

1. Ms. Jeanne Hanson
National Marine Fisheries Service
222 West 7th Ave., #43
Anchorage, AK 99513-7577
2. Ms. Heather Dean
U.S. Environmental Protection Agency
222 West 7th Ave., #19
Anchorage, AK 99513-7588
3. Ms. Kathleen Kuna
Project Manager
U.S. Corps of Engineers
P.O. Box 898
Anchorage, AK 99506-0898
4. Ms. Ann Rappoport
Field Supervisor
U.S. Field & Wildlife Service
605 W. 4th Ave., Room 62
Anchorage, AK 99501
5. Mr. Bill Lamoreaux
ADEC
555 Cordova Street
Anchorage, AK 99501
6. Mr. Stewart Seaberg
Habitat Biologist
ADF&G
333 Raspberry Road
Anchorage, AK 99518-1599
7. Mr. Gary Prokosch
Water Resources Chief
DNR, Mining & Water Mgt.
3601 C Street, Suite 800
Anchorage, AK 99503-5935
8. Mr. Walt Wrede
Lake & Peninsula Borough
P.O. Box 495
King Salmon, AK 99613

INTERAGENCY WORKING AGREEMENT CONCURRENCE FORM

Project Description: **ILIAMNA-NONDALTON ROAD IMPROVEMENTS**

State Project #: 51951 Federal Project #: STP-0214(3)

Environmental Document: EA Date Concurrence Due: 9/6/99

Concurrence Point

- | | |
|---|--|
| <input type="checkbox"/> Purpose & Need | <input type="checkbox"/> Alternatives to be analyzed |
| <input checked="" type="checkbox"/> Preferred Alternative | |
-

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative by his/her signature to this document signifies one of the following:

- | | |
|---|---|
| <input type="checkbox"/> Concurrence ¹ | <input type="checkbox"/> Nonconcurrence ² |
| <input type="checkbox"/> Non-participation by choice ³ | <input type="checkbox"/> Non-participation by constraint ⁴ |

Comments/Reasons for nonconcurrence:

Agency	Signature	Date
--------	-----------	------

¹ Concurrence means that the information is adequate for the state under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not be construed as nonparticipation by choice.

Please return form to: *Jerry O. Ruehle, Environmental Coordinator, Preliminary Design and Environmental Section, Box 196900, Anchorage, Alaska 99519-6900.*

October 7, 1997

Re: Iliamna Road Improvements
Project No. STP-0214(3)/51951
RE-SCOPING LETTER

Dear :

The Alaska Department of Transportation & Public Facilities (ADOT&PF) is continuing to solicit comments and information on a proposal to upgrade and improve road access between the Village of Iliamna and the City of Nondalton. Your name appears on our current mailing list for new information and developments pertaining to this project.

During 1995, agency and public comments were solicited, considered and included in a National Environmental Policy Act (NEPA) Categorical Exclusion (CE) document. The FHWA evaluated and approved the CE on January 3, 1996. Subsequently, ADOT&PF received correspondence from parties expressing concern over possible secondary and cumulative impacts. In response, ADOT&PF hired a contractor to prepare a Secondary and Cumulative Impacts Study (SCIS), conducted public scoping activities for the SCIS and re-evaluated the CE. In December, 1996, the FHWA concluded that the re-evaluation documentation substantiated the finding that no secondary and cumulative impacts would be of a significant level.

Notwithstanding the finding that the CE was legally sufficient, after careful consideration of all the environmental documents and public input, the FHWA determined that further environmental analysis and public involvement, in the form of Environmental Assessment (EA) development, would be beneficial to the FHWA, ADOT&PF and the public interest. This letter is the first stage of a re-scoping effort to solicit comments and information for an EA.

To provide you with project background, an expanded Statement of Purpose and Need is enclosed. In summary, ADOT&PF proposes to:

1. Resurface, restore and rehabilitate the existing approximately 14.4 mile road from Iliamna to the Newhalen River,

2. Construct an approximately 653' long, 18.67' wide, one-lane, steel girder bridge across the Newhalen River, approximately 20 miles above the mouth, and
3. Construct the approximately 1.7 mile pioneer road/ATV Trail (from the River to the end of the approximately 1.4 mile improved road leading to Nondalton) to meet current roadway standards.

Road improvements would include reconstruction of the roadway base, resurfacing, installation of culverts where necessary, and embankment stabilization to prevent and arrest erosion. Material required for construction would be obtained from excavation and an existing upland materials source located near Nondalton. A Build Alternative and a No Action Alternative will be explored, as well as additional reasonable alternatives respondents suggest during the re-scoping process.

Construction would involve placement of fill in wetlands, requiring Corps of Engineers Section 404/10 and possible Nationwide Permits, and a Coastal Zone review for development within the Bristol Bay Coastal Resource Area. A Coast Guard Section 9 Bridge Permit and an Alaska Department of Fish & Game Habitat Permit will also be required.

The Department of Natural Resources (DNR), State Historic Preservation Office (SHPO) requested a reconnaissance level cultural resources survey be conducted on a 1.7 mile segment of the proposed road corridor between the material source southwest of Nondalton and the Newhalen River. The DNR Office of History and Archeology performed this survey in September, 1996, and concluded that there are no cultural properties in the project area. The SHPO issued a Finding of No Effect on October 18, 1996.

We wish to ensure that all factors are considered in the development of the proposal. If you would like to comment on this project, please send your comments to me at the above address by Friday, November 7, 1997. Public scoping meetings are scheduled for October 27th in Iliamna, October 28th in Nondalton and November 4th in Anchorage. If you would like more information about upcoming public meetings, or have any questions please contact Ms. Helen Lons, Environmental Analyst, at 269-0529.

Sincerely,



Susan N. Wick
Environmental Team Leader

Enclosures: Statement of Purpose and Need
Location & Vicinity Maps (Revised)

cc: Jim Bryson, Realty/Environmental Officer, FHWA
John Dickenson, P.E., Project Manager, Highway Design
Helen Lons, Environmental Analyst, PD&E
Jack Melton, Area Planner, ADOT&PF

Bob Arce
L&PB Assembly
P.O. Box 158
Iliamna, AK 99606

Mayor Tom Greene
City of Nondalton
P.O. Box 89
Nondalton, 99640

Wassie Balluta
P.O. Box 170
Iliamna, AK 99606

Eleanor M.C - Johnson
Kijik Corp.
4155 Tudor Ctr. Drive
Suite 104
Anchorage, AK 99508

Myrtle Anelon
President
Iliamna Natives, Ltd.
P.O. Box 245
Iliamna, AK 99606

Ronald Wassillie
President
Newhalen Tribal Council
Newhalen, AK 99606

Jeff Parker
Richard A. Jameson & Associates
Attorneys at Law
500 "L" Street, Suite 502
Anchorage, AK 99502

Cliff Eames
Issues Director
Alaska Center for the Environment
519 West 8th Ave., Suite 201
Anchorage, AK 99501

Carl Bullo
Alaska Wilderness Lodge
Wilderness Point
General Delivery
Port Alsworth, AK 99653

Roger & Lula Cusack
Cusack's Alaska Lodge
P.O. Box 194
Iliamna, AK 99606

Brent Petrie
INNEC
Box 210
Iliamna, AK 99606

Bill Pierce
Superintendent
LCNPP
4230 University Drive, Suite 311
Anchorage, AK 99508

Walt Wrede
Borough Manager
Lake & Peninsula Borough
P.O. Box 495
King Salmon, AK 99613

John Adcox
Iliamna Airport Manager
P.O. Box 187
Iliamna, AK 99606

Sue Arce
General Delivery
Iliamna, AK 99606

Tim LaPorte
Iliamna Air Taxi
General Delivery
Iliamna, AK 99606

Doug Baily
637 West 3rd Ave.
Anchorage, AK 99501

Hjalmar E. Olson
President & CEO
BBNC
P.O. Box 100220
Anchorage, AK 99510

Bruce Johnson
Bristol Bay Sportfishing
P.O. Box 164
Iliamna, AK 99606

Ken Owsichek
Fishing Limited Lodges
P.O. Box 190301
Anchorage, AK 99519

Dennis Neidermeyer
Business Manager
L&PB School District
P.O. Box 498
King Salmon, AK 99613

Lee Fink
Chief Ranger
LCNPP
Port Alsworth, AK 99653

Greg O'Keef
Kijik Corp.
4155 Tudor Ctr. Drive
Suite 104
Anchorage, AK 99508

Harvey and Maria Anelon
P.O. Box 305
Iliamna, AK 99606

Mayor Jim Lamont
City of Newhalen
Newhalen, AK 99606

Debby Tennison
DCRA
P.O. Box 790
Dillingham, AK 99576

Phil Culter
President
Alaska Sportfishing Association
P.O. Box 24-1847
Anchorage, AK 99524-1847

Kirk and Sarah Gay
Valhalla Lodge
P.O. Box 190583
Anchorage, AK 99519-0583

Copper River Lodge
P.O. Box 200831
Anchorage, AK 99520

Jim Winchester
Iliamna Lake Resort
P.O. Box 208
Iliamna, AK 99606

Ted Gerken
Iliaska Lodge
P.O. Box 228
Iliamna, AK 99606

Brad or Sheryl Johnson
Lakeside Lodge
Port Alsworth, AK 99653

Tim and Nancy La Porte
Lake View Lodge
P.O. Box 109
Iliamna, AK 99606

Bill Sims
Newhalen Lodge
3851 Chinak Bay Dr.
Anchorage, AK 99515

Mark Kneen
Point Adventure Lodge
P.O. Box 141
Iliamna, AK 99606

Craig Augustynovich
Rainbow King Lodge
P.O. Box 106
Iliamna, AK 99606

John Baechler
Red Quill Lodge
P.O. Box 49
Iliamna, AK 99606

Glen and Patty Alsworth
The Farm Lodge
Port Alsworth, AK 99653

Jim Forbes
Attorney at Law
135 Christiansen Drive, Suite 300
Anchorage, AK 99501

Mark Hickey
211 4th St.
Suite 108
Juneau, AK 99801

Gordon Lewis
Community Planning
3100 C Portage Bay Place East
Seattle, WA 98102

Ms. Judith Bittner
State Historic Preservation Officer
Office of History and Archaeology
3601 "C" Street, Suite 1278
Anchorage AK 99503-5921

John Johnson
Director
Village of Iliamna
P.O. Box 286
Iliamna, AK 99606

Anne Leggett
C/O HDR
2525 C Street
Anchorage, AK 99503

Sue Flensburg
Bristol Bay Coastal Resource Service Area
P.O. Box 849
Dillingham, AK 99576

Allen Backford
Bristol Bay Native Association
P.O. Box 310
Dillingham, AK 99576

Ken Arndt
Tidemark
P.O. Box 249
Homer, AK 99603

Clara Trefon-Tribal Administrator
Nondalton Tribal Council
P.O. Box 49
Nondalton, AK 99640

Joan Darnell, Chief of Env. Quality
National Park Service
Alaska Systems Support Office
2525 Gambell St., Room 107
Anchorage, AK 99503

Resource Analysts
ATTN: Jim Glaspell
P.O. Box 773216
Eagle River, AK 99577

Bob Evans
P.O. Box 100384
Anchorage, AK 99510

Ms. Patti Sullivan
FAA-Airports Division
222 West 7th Avenue, #14
Anchorage, AK 99513

Mr. Jim Helfinstine
U.S. Coast Guard
P.O. Box 25517
Juneau, AK 99802-5517

Thomas E. Meacham
9500 Prospect Drive
Anchorage, AK 99516

George Cole
Cominco American, Inc.
15918 East Euclid Avenue
Spokane, WA 99216-1815

Robert J. Clark
Chief Executive Officer
Bristol Bay Area Health Corp.
P.O. Box 130
Dillingham, AK 99576

Andy Anderson
Deputy Director
Bristol Bay Housing Authority
P.O. Box 50
Dillingham, AK 99576

Mr. Mark Wenger
P.O. Box 2322
Seward, AK 99664

Robert Drew & Nellie Drew
Box 146
Naknek, AK 99633

Viola Paul
Box 27
Levelock, AK 99625

Helen Tretikoff
9499 Brayton Dr. #176
Anchorage, AK 99507

George Tretikoff
c/o 1935 Red Fox
Box 7
Wasilla, AK 99654

Pete Trefon, Jr.
POB 73
Nondalton, AK 99640

Dennis N. Trefon
POB 112
Nondalton, AK 99640

Ida M. Trefon
POB 63
Nondalton, AK 99640

Elaine Trefon Aaberg
POB 87
Nondalton, AK 99640

Rickey Trefon
General Delivery
Nondalton, AK 99640

Melvin M. Trefon
POB 055
Nondalton, AK 99640

Representative Carl Moses
716 West 4th Ave.
Anchorage, AK 99501-2133

Senator Lyman Hoffman
716 W. 4th Ave., Ste 240
Anchorage, AK 99501-2133

Iliamna Nondalton Road Improvements Statement of Purpose and Need

The State of Alaska, the communities of Iliamna, Newhalen and Nondalton, and the Lake and Peninsula Borough have identified the need for improving overland access between Iliamna/Newhalen and Nondalton. It is the highest priority transportation improvement project of the Lake and Peninsula Borough, as well as the communities of Iliamna/Newhalen and Nondalton. A well-traveled, but substandard gravel road suitable for cars, trucks, and heavy equipment exists from Iliamna/Newhalen to the bridge crossing site at the Newhalen River. A lesser pioneer road/ATV trail exists from the crossing site to Nondalton. Some portions of the road/trail cross Native corporation property because the road clearing has overgrown. The improvement and completion of this road offers many important economic and social benefits for the reasons outlined below:

Public safety will be improved. There will be less reliance on air transportation between Iliamna/Newhalen and Nondalton. Small aircraft transportation has a much higher death and injury rate per passenger than surface transportation. Therefore, the opportunities and likelihood of serious injuries and accidental deaths resulting from air travel between Iliamna/Newhalen and Nondalton will be lessened. Currently, overland winter travel between Iliamna and Nondalton is possible, but hazardous, across the frozen Newhalen River and Sixmile Lake. During the winter of 1995, two snowmachine riders drowned after falling through the ice near Nondalton. With a bridge, safer overland transportation, especially during periods of inclement weather, reduced visibility, and unstable river ice conditions, will become the preferred method of travel.

Health care/services will be improved. It will be easier to share facilities, expertise, equipment and evacuate the critically ill or injured. The difficulty and expense of getting very ill or injured people out of Nondalton in an emergency will be lessened. This benefit will be especially valuable in the event of a major disaster such as a fire.

The economies of Iliamna/Newhalen and Nondalton will expand and diversify as a result of this project, largely due to the resulting lower costs of goods in these communities. Currently, Nondalton is the largest community in the Lake and Peninsula Borough, but it is relatively isolated and offers very few job opportunities. If Nondalton is connected to Iliamna/Newhalen by road, the customer base for local businesses will effectively be doubled. This will give Nondalton residents the ability to take advantage of a greatly expanded range of employment opportunities. A further important benefit of this project will be the reduction in costs to passengers and carriers of freight between Iliamna/Newhalen and Nondalton. These cumulative economic factors are likely to increase trade and commerce between Iliamna/Newhalen and Nondalton.

Supply of government services to the residents of these communities should become more efficient and convenient as a result of increased and less expensive access. Government facilities at all levels could be consolidated at one place on the road system rather than being spread out among several communities.

There will result a long-term enhancement on the delivery of educational services, with benefits increasing over time. Completion of the Iliamna-Nondalton Road will benefit the school district through an improved ability to transport supplies, materials, students and personnel between Iliamna/Newhalen and Nondalton. The improvements will not only reduce costs but will also increase the safety of students and staff who travel regularly between these communities. The road reconstruction will also provide the school district options in providing enhanced secondary programs to students in Newhalen and Nondalton where student populations are not large enough to warrant the diversity of curriculum that could be made available if certain classes were consolidated. Improved transportation services will also provide students from both schools enhanced competition opportunities in sports activities.

The project will have a positive effect on the growth of "middle of the market" tourism in Iliamna/Newhalen and Nondalton. Alaska Department of Fish and Game reports the current growth in angler days at between seven and 11 percent per year in this general area. Air taxi operators report similar growth rates for their operations during the summer and fall. Many other signs and statistics point to an increase in the utilization of the area. The project will provide some of the infrastructure necessary to accommodate growth of the mid-market tourism. Iliamna is a favorite destination for recreational fishing on the Newhalen River and Nondalton is the largest community adjacent to Lake Clark National Park.

The project will have positive environmental effects by correcting, or alleviating, some serious environmental problems which presently exist:

First, because no bridge exists, it is now necessary to drive vehicles and heavy equipment across the Newhalen River (a world class salmon and rainbow trout resource) to access the other side. As an example, the Alaska Department of Fish and Game (ADF&G) has issued the City of Nondalton permits to drive its heavy equipment across the river so it can maintain the remainder of the road to Iliamna. With a bridge, it would not be necessary to disturb fish habitat by driving vehicles across the river bed.

Second, the existing road has some engineering and design problems and is not as well maintained as it would be if the link between Nondalton and Iliamna were complete. This situation results in unnecessary environmental damage along the road corridor. For example, there is serious erosion taking place at bridge sites and elsewhere along the road. The road also has drainage problems in certain areas. This frequently results in large sections of the road becoming impassable due to mud. During these periods, vehicles attempt to drive around the poorly drained areas which causes the "footprint" of the road to become wider and wider and results in unnecessary damage to the adjacent tundra. The proposed road improvements will alleviate these problems.

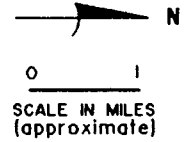
Third, the current method of getting fuel to the community of Nondalton, in addition to being a hardship for its residents, represents a serious threat to the environment. The Nondalton airstrip is too short for cargo planes to legally land. Further, fuel cannot be transported overland to the Iliamna airport or dock because there is no bridge across the Newhalen River. As a result, Nondalton residents must get their fuel in Iliamna, transport it by road to a place along the river several miles below the proposed bridge site known as the "landing," and then transport the fuel by skiff in 55 gallon drums up the river and across Six Mile Lake to Nondalton. The environmental risks associated with this complex mode of transporting fuel are significant. The proposed road improvements will alleviate these problems.

In conclusion, the long history of study and number of endorsements for improving the overland access between Iliamna/Newhalen and Nondalton demonstrates the need for this project. The purpose of this project is to meet those needs to the greatest extent that is practical.

Revised 10-6-97

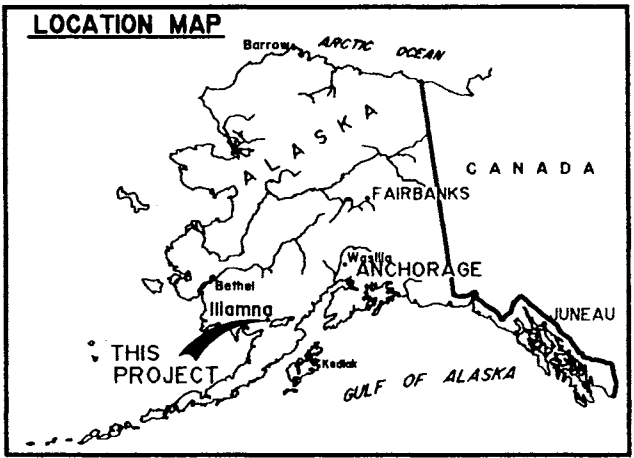
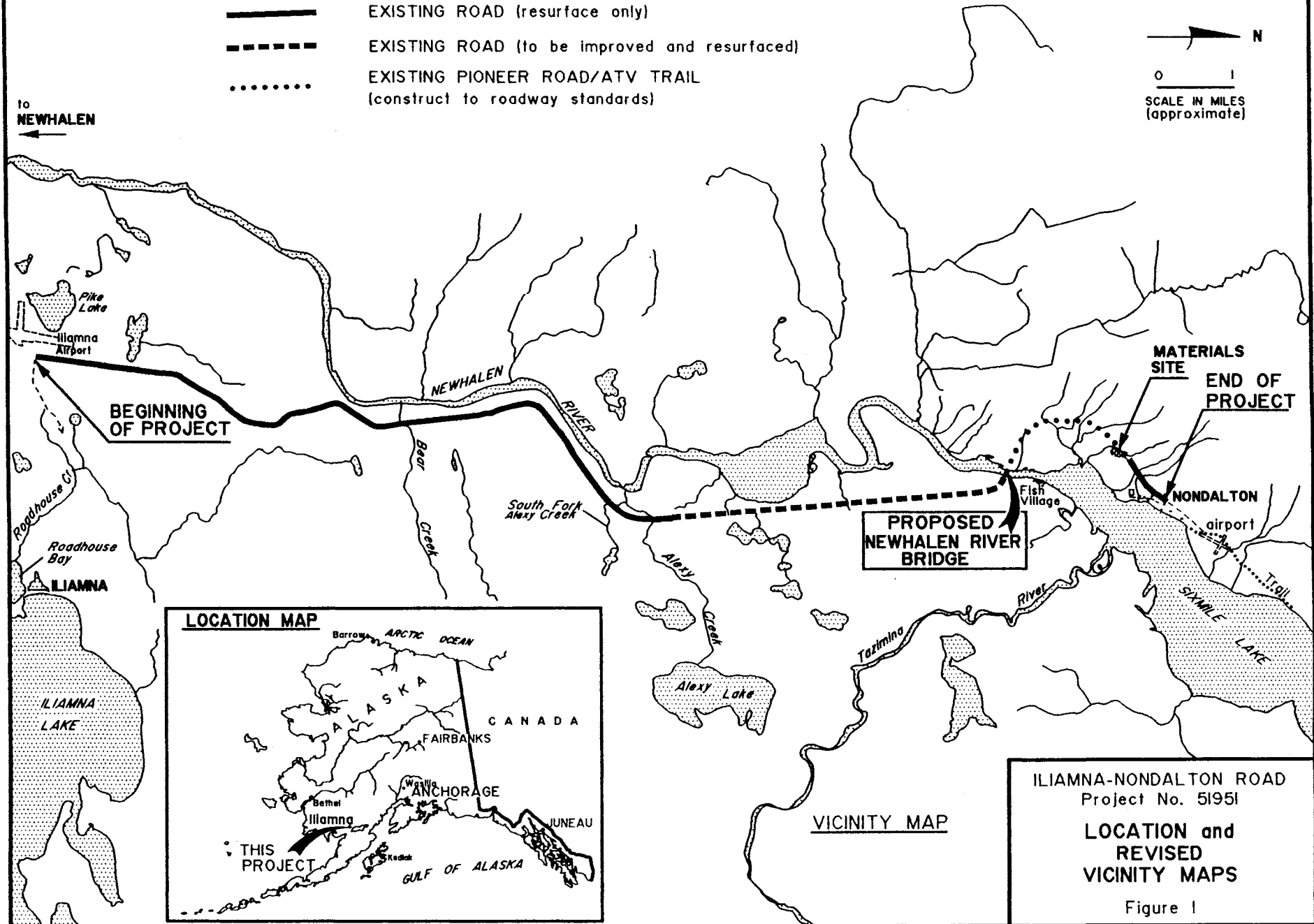
LEGEND

- EXISTING ROAD (resurface only)
- - - - - EXISTING ROAD (to be improved and resurfaced)
- EXISTING PIONEER ROAD/ATV TRAIL (construct to roadway standards)



to
NEWHALEN

A-141



VICINITY MAP

ILIAMNA-NONDALTON ROAD
Project No. 51951
**LOCATION and
REVISED
VICINITY MAPS**
Figure 1

PROOF OF PUBLICATION

STOF0125
2X8

VENUS SALAZAR
being first duly sworn on oath
deposes and says that he/she
is an accounting clerk of
the Anchorage Daily News, a
daily newspaper. That said
newspaper has been approved as
a proof of publication and it now
and has been published in the
English language continually as a
daily newspaper in Anchorage,
Alaska, and it is now and during
all said time was printed in an
office maintained at the aforesaid
place of publication of said
newspaper. That the annexed is
of an advertisement
as published in regular
(and not in supplemental
form) of said newspaper on
OCT 20 & 30, 1997
and that such newspaper was
regularly distributed to its
subscribers during all of said
period. That the full amount of
the fee charged for the foregoing
publication is not in excess of
the rate charged private
individuals.

Signed V. Salazar

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
Notice of Continuing Engineering Studies and Environmental
Assessment Development
ILIAMNA - NONDALTON ROAD IMPROVEMENTS
Project No. STP-0214-03/51951

The Alaska Department of Transportation and Public Facilities (ADOT & PF) is continuing with engineering and environmental studies for proposed improvements to the Iliamna-Nondalton Road. Iliamna is located on the northwest side of Iliamna Lake, 225 miles southwest of Anchorage.

The purpose of the project is to improve overland access between the communities of Iliamna/Newhalen and Nondalton.

An Environmental Assessment (EA) will be prepared, describing the alternatives considered and explaining probable economic, social and environmental effects. A Build Alternative and a No Action Alternative will be explored, as well as additional reasonable alternatives respondents suggest during this public comment period.

The proposed preliminary design would: 1) resurface, restore and rehabilitate the existing approximately 14.4 mile road from Iliamna to the Newhalen River, 2) construct an approximately 653 foot long, 18.67 foot wide, one-lane steel girder bridge across the Newhalen River, approximately 20 miles above the mouth, and 3) construct the approximately 1.7 mile pioneer road/ATV trail (from the River to the end of the approximately 1.4 mile improves road leading to Nondalton) to meet current roadway standards.

Road improvements would include reconstruction of the roadway base, resurfacing, installation of culverts where necessary, and embankment stabilization to prevent and arrest erosion. Material required for construction would be obtained from excavation and an existing upland materials source located near Nondalton.

Construction would involve placement fill in wetlands and development within the Coastal Zone. The State Historic Preservation Office has determined that no cultural resources would be adversely affected by this project.

To ensure that all possible factors are considered in the design of the proposed project, ADOT&PF is requesting public comments and recommendations. Public scoping meetings are scheduled for October 27th in Iliamna, October 28th in Nondalton and November 4th, in Anchorage. Please send your written comments to the following address by November 7, 1997:

Susan N. Wick
Environmental Team Leader
Preliminary Design and Environmental
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, AK 99519-6900

If you have any questions or would like additional information on the project or public meetings, please contact Ms. Helen Lons, Environmental Analyst, at (907) 269-0529.

Persons with a hearing impairment can contact ADOT&PF at our Telephone Device for the Deaf (TDD) number, 269-0473. We are also able to offer, upon request, reasonable accommodations for special needs related to other disabilities.

PROOF OF PUBLICATION

STOF0125

VENUS SALAZAR
being first duly sworn on oath
deposes and says that he/she
is an accounting clerk of
the Anchorage Daily News, a
daily newspaper. That said
newspaper has been approved as
a proof of publication and it now
and has been published in the
English language continually as a
daily newspaper in Anchorage,
Alaska, and it is now and during
all said time was printed in an
office maintained at the aforesaid
place of publication of said
newspaper. That the annexed is
a copy of an advertisement
as it was published in regular
issues (and not in supplemental
form) of said newspaper on
OCT 13, 1997
and that such newspaper was
regularly distributed to its
subscribers during all of said
period. That the full amount of
the fee charged for the foregoing
publication is not in excess of
the rate charged private
individuals.

Signed V. Salazar

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
Notice of Continuing Engineering Studies and Environmental
Assessment Development
ILIAMNA - NONDALTON ROAD IMPROVEMENTS
Project No. STP-0214-03/51951

The Alaska Department of Transportation and Public Facilities (ADOT & PF) is continuing with engineering and environmental studies for proposed improvements to the Iliamna-Nondalton Road. Iliamna is located on the northwest side of Iliamna Lake, 225 miles southwest of Anchorage.

The purpose of the project is to improve overland access between the communities of Iliamna/Newhalen and Nondalton.

An Environmental Assessment (EA) will be prepared, describing the alternatives considered and explaining probable economic, social and environmental effects. A Build Alternative and a No Action Alternative will be explored, as well as additional reasonable alternatives respondents suggest during this public comment period.

The proposed preliminary design would: 1) resurface, restore and rehabilitate the existing approximately 14.4 mile road from Iliamna to the Newhalen River, 2) construct an approximately 653 foot long, 18.67 foot wide, one-lane steel girder bridge across the Newhalen River, approximately 20 miles above the mouth, and 3) construct the approximately 1.7 mile pioneer road/ATV trail (from the River to the end of the approximately 1.4 mile improves road leading to Nondalton) to meet current roadway standards.

Road improvements would include reconstruction of the roadway base, resurfacing, installation of culverts where necessary, and embankment stabilization to prevent and arrest erosion. Material required for construction would be obtained from excavation and an existing upland materials source located near Nondalton.

Construction would involve placement fill in wetlands and development within the Coastal Zone. The State Historic Preservation Office has determined that no cultural resources would be adversely affected by this project.

To ensure that all possible factors are considered in the design of the proposed project, ADOT&PF is requesting public comments and recommendations. Public scoping meetings are scheduled for October 27th in Iliamna, October 28th in Nondalton and November 4th, in Anchorage. Please send your written comments to the following address by November 7, 1997:

Susan N. Wick
Environmental Team Leader
Preliminary Design and Environmental
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, AK 99519-6900

If you have any questions or would like additional information on the project or public meetings, please contact Ms. Helen Lons, Environmental Analyst, at (907) 269-0529.

Persons with a hearing impairment can contact ADOT&PF at our Telephone Device for the Deaf (TDD) number, 269-0473. We are also able to offer, upon request, reasonable accommodations for special needs related to other disabilities.

**STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND
PUBLIC FACILITIES**

**Notice of Continuing Engineering Studies and
Environmental Assessment Development
ILIAMNA - NONDALTON ROAD IMPROVEMENTS
Project No. STP-0214(3)51951**

The Alaska Department of Transportation and Public Facilities (ADOT&PF) is continuing with engineering and environmental studies for proposed improvements to the Iliamna - Nondalton Road. Iliamna is located on the northwest side of Iliamna Lake, 225 miles southwest of Anchorage.

The purpose of the project is to improve overland access between the communities of Iliamna/Newhalen and Nondalton.

An Environmental Assessment (EA) will be prepared, describing the alternatives considered and explaining probable economic, social and environmental effects. A Build Alternative and a No Action Alternative will be explored, as well as additional reasonable alternatives respondents suggest during this public comment period.

The proposed preliminary design would: 1) resurface, restore and rehabilitate the existing approximately 14.4 mile road from Iliamna to the Newhalen River. 2) construct an approximately 653 foot long, 18.67 foot wide, one-lane steel girder bridge across the Newhalen River, approximately 20 miles above the mouth, and 3) construct the approximately 1.7 mile pioneer road/ATV trail (from the River to the end of the approximately 1.4 mile improved road leading to Nondalton) to meet current roadway standards.

Road improvements would include reconstruction of the roadway base, resurfacing, installation of culverts where necessary, and embankment stabilization to prevent and arrest erosion. Material required for construction would be obtained from excavation and an existing upland materials source located near Nondalton.

Construction would involve placement of fill in wetlands and development within the Coastal Zone. The State Historic Preservation Office has determined that no cultural resources would be adversely affected by this project.

To ensure that all possible factors are considered in the design of the proposed project, ADOT&PF is requesting public comments and recommendations. Public scoping meetings are scheduled for October 27th in Iliamna, October 28th in Nondalton and November 4th, in Anchorage. Please send your written comments to the following address by November 7, 1997:

**Susan N. Wick
Environmental Team Leader
Preliminary Design and Environmental
Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, AK 99519-6900**

If you have any questions or would like additional information on the project or public meetings, please contact Ms. Helen Lons, Environmental Analyst, at (907) 269-0529.

Persons with a hearing impairment can contact ADOT&PF at our Telephone Device for the Deaf (TDD) number, 269-0473. We are also able to offer, upon request, reasonable accommodations for special needs related to other disabilities.

ALASKA NEWSPAPERS, INC.
dba THE ARCTIC SOUNDER, THE
BRISTOL BAY TIMES, THE CORDOVA
TIMES, THE DUTCH HARBOR
FISHERMAN, THE SEWARD PHOENIX
LOG, THE TUNDRA DRUMS, VALDEZ
VANGUARD, AND THE BERING STRAIT RECORD

AO/PO# AO-25-6529
AIO# 74007
INV#

SOA-DEPT. OF TRANSPORTATION AND PUBLIC FACILITIES
PO BOX 196900
ANCHORAGE, AK 99519

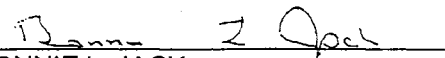
AFFIDAVIT OF PUBLICATION

UNITED STATES OF AMERICA, STATE OF ALASKA, THIRD DIVISION. BEFORE ME, THE UNDERSIGNED, A NOTARY PUBLIC THIS DAY PERSONALLY APPEARED JAMIE A. JOHNSON WHO, BEING FIRST DULY SWORN, ACCORDING TO LAW, SAYS THAT SHE IS THE BILLING CLERK OF BRISTOL BAYTIMES PUBLISHED AT ANCHORAGE IN SAID DIVISION THREE AND STATE OF ALASKA AND THAT THE ADVERTISEMENT, OF WHICH THE ANNEXED IS A TRUE COPY, WAS PUBLISHED IN SAID PUBLICATION ON 10/16/97 AND THEREAFTER FOR 1 CONSECUTIVE WEEK(S), THE LAST PUBLICATION APPEARING ON 10/23/97 AND THAT THE RATE CHARGED THEREON IS NOT IN EXCESS OF THE RATE CHARGED TO PRIVATE INDIVIDUALS.


JAMIE A. JOHNSON
BILLING CLERK, ALASKA NEWSPAPERS

SWORN TO BEFORE ME ON 12/9/97




BONNIE L. JACK
MY COMMISSION EXPIRES ON 8/15/99

**STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES**

**NOTICE OF PUBLIC MEETINGS
FOR
ILIAMNA - NONDALTON ROAD IMPROVEMENTS
(Project No. 51951)**

October 27, 1997	Iliamna Village Council Bldg.	3 - 7 PM
October 28, 1997	Nondalton Community Bldg.	2 - 6 PM
November 4, 1997	ADOT&PF Aviation Bldg. 4111 Aviation Drive, Anchorage Main Conference Room, 2nd Floor	3 - 7 PM

The Alaska Department of Transportation & Public Facilities (ADOT&PF) is continuing to solicit comments and information from the public on a proposal to improve overland access between Iliamna/Newhalen and Nondalton.

After careful consideration of all the environmental documents and public input, the Federal Highway Administration has determined that further environmental analysis and public involvement, in the form of Environmental Assessment (EA) development, would be beneficial to the public interest. In the EA, Build and No Action Alternatives will be explored, as well as additional reasonable alternatives respondents suggest.

These scoping meetings are provided as an opportunity for the public to express their comments, ideas and concerns to ADOT&PF. Meetings will follow an open house format where individuals can stop by at their convenience and have their questions answered and concerns discussed by project personnel.

We wish to ensure that all factors are considered in the development of this proposal. Written comments may be sent to the following address by November 7, 1997:

**Susan N. Wick, Environmental Team Leader
Preliminary Design & Environmental
Alaska Department of Transportation & Public Facilities
P.O. Box 196900, Anchorage, AK 99519-6900.**

If you have any questions, please call Helen Lons, Environmental Analyst, at 269-0529

Persons with a hearing impairment can contact the Department at our Telephone Device for the Deaf, number 269-0473. We are also able to offer, upon request, reasonable accommodations for the special needs related to disabilities.



MEMORANDUM

STATE OF ALA

Department of Transportation and Public Facilities
Central Region-Division of Design and Construction
Preliminary Design and Environmental

To: File

Date: October 16, 1997

File No.: Project No. 51951

Phone No.: 269-0529

From: Helen Lons
Environmental Analyst

[Handwritten signature]

Subject: Iliamna-Nondalton Road
Public Meetings
Announcement

I spoke with Casey Lowe, Fish Board Coordinator, Juneau, about distributing information about our upcoming public meetings to Fish Board members. I faxed her (465-6094) the Iliamna/Nondalton Road public notice poster with the three scheduled meeting locations and project description. She agreed to distribute this information to Fish Board members in time for their next statewide meeting, to be held in Girdwood.

Transaction report table with columns: DATE, START, RECEIVER, TX TIME, PAGES, TYPE, NOTE, M#, DP. Includes a summary row for TOTAL.



MEMORANDUM

STATE OF ALA

Department of Transportation and Public Facilities
Central Region-Division of Design and Construction
Preliminary Design and Environmental

To: File

Date: November 3, 1997

File No.: Project No. 51951

Phone No.: 269-0529

From: Helen Lons
Environmental Analyst

Subject: Iliamna-Nondalton Road
KNBA Radio
Announcement

I spoke with Kathy, at KNBA (90.3) Radio (279-5622) this morning about making public announcements. She offered to have the Anchorage public meeting announced a few times today and tomorrow, before the November 4th, 3 p.m. meeting. She asked me to fax her the information and she would ensure that it would be announced. I thanked her for her efforts.

A-146

Table with 2 columns: TO, FROM, COMPANY, DEPT., FAX NO., No. Of Pages, PHONE NO., FAX NO., DATE, TIME.

RE: DOT is having a public meeting in Anchorage Tuesday, 3-7 PM for the Iliamna-Nondalton Road Project. It would be great if you could announce this a couple of times before then. Please call if you have any questions. Thanks very much. Helen Lons

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES

NOTICE OF PUBLIC MEETINGS
FOR
ILIAMNA - NONDALTON ROAD IMPROVEMENTS
(Project No. 51951)

October 27, 1997 Iliamna Village Council Bldg. 3 - 7 PM

October 28, 1997 Nondalton Community Bldg. 2 - 6 PM

November 4, 1997 ADOT&PF Aviation Bldg. 3 - 7 PM
4111 Aviation Drive, Anchorage
Main Conference Room, 2nd Floor

The Alaska Department of Transportation & Public Facilities (ADOT&PF) is continuing to solicit comments and information from the public on a proposal to improve overland access between Iliamna/Newhalen and Nondalton.

After careful consideration of all the environmental documents and public input, the Federal Highway Administration has determined that further environmental analysis and public involvement, in the form of Environmental Assessment (EA) development, would be beneficial to the public interest. In the EA, Build and No Action Alternatives will be explored, as well as additional reasonable alternatives respondents suggest.

These scoping meetings are provided as an opportunity for the public to express their comments, ideas and concerns to ADOT&PF. Meetings will follow an open house format where individuals can stop by at their convenience and have their questions answered and concerns discussed by project personnel.

We wish to ensure that all factors are considered in the development of this proposal. Written comments may be sent to the following address by November 7, 1997:

Susan N. Wick, Environmental Team Leader
Preliminary Design & Environmental
Alaska Department of Transportation & Public Facilities
P.O. Box 196900, Anchorage, AK 99519-6900.

If you have any questions, please call Helen Lons, Environmental Analyst, at 269-0529.

Persons with a hearing impairment can contact the Department at our Telephone Device for the Deaf, number 269-0473. We are also able to offer, upon request, reasonable accommodations for the special needs related to disabilities.

ILIAMNA - NONDALTON ROAD IMPROVEMENTS

Project Number STP-0214(3)/51951

Project Summary - October, 1997

The State of Alaska, the communities of Iliamna, Newhalen and Nondalton, and the Lake & Peninsula Borough have identified the need to improve overland access between Iliamna/Newhalen and Nondalton.

Residents have expressed the need to improve public safety, health care/services, the economy, government services, education and tourism in their communities. Environmental concerns with the current transportation route need to be addressed, including drainage and erosion problems, disturbance of fish habitat by fording the Newhalen River with heavy equipment, and hazardous modes of fuel transport across the river.

The purpose of this road improvements project is to meet these needs. At this time, the ADOT&PF proposes to:

- (1) Resurface, restore and rehabilitate the existing approximately 14.4 mile road from Iliamna to the Newhalen River,
- (2) Construct an approximately 653 foot long, one-lane, steel girder bridge across the Newhalen River, approximately 20 miles above the mouth. and
- (3) Improve the approximately 1.7 mile pioneer road/ATV Trail (from the River to the end of the approximately 1.4 mile improved road leading to Nondalton) to meet current national roadway standards.

ANALYSIS OF IMPACTS

In accordance with the National Environmental Policy Act (NEPA), any highway construction project proposed for federal funding requires the preparation of a document which addresses the potential environmental, social and economic impacts. The Federal Highway Administration (FHWA) must approve these documents before federal money can be spent on project designs. There are three levels of complexity of NEPA documentation:

1. CATEGORICAL EXCLUSION (CE)

This is the shortest and simplest document. A CE may be prepared when it is apparent that the project will result in no significant impacts. A CE takes from a few days to a few months to complete.

2. ENVIRONMENTAL ASSESSMENT (EA)

An EA is a longer and more detailed study of potential project impacts. The EA may conclude either (1) there are no significant impacts, in which case the study is concluded and a Finding of No Significant Impact (FONSI) is prepared, or (2) there are significant impacts which need to be further addressed in an Environmental Impact Statement (EIS). An EA may take as long as 1-2 years to complete.

3. ENVIRONMENTAL IMPACT STATEMENT (EIS)

An EIS is the most detailed, time consuming document to prepare. It states that the project will result in significant impacts, discusses what those impacts are, describes alternatives to the project and reviews mitigation that could be done to balance the significant impacts. An EIS may take as long as 3-5 years to complete.

CATEGORICAL EXCLUSION - 1995

In 1995, the ADOT&PF prepared a CE, concluding that if the road and bridge were built, no significant impacts would occur. The FHWA agreed and approved the CE and the use of federal funds to design the project.

CONTROVERSY

In early 1996, an attorney representing an undisclosed client who strongly opposes the Iliamna-Nondalton project, wrote to the FHWA requesting reconsideration of the CE. He requested analysis of potential negative cumulative impacts of the proposed project. The Alaska Center for the Environment also requested that the FHWA perform a more detailed level of NEPA analysis. In addition, members of the Alaska Sportfishing Association (ASA) sent letters to the Governor requesting that an EIS be prepared.

ADDITIONAL STUDIES

In May, 1996, ADOT&PF and FHWA agreed to reevaluate the CE by exploring impacts addressed in these letters with a "Secondary and Cumulative impacts Study" (SCIS).

A contractor, Community Planning, completed the Draft SCIS in September, 1996. This study identified, evaluated and determined the magnitude of the secondary and cumulative impacts likely to result from

the project and the no action alternative. ADOT&PF mailed the SCIS to approximately 66 interested individuals and solicited public comments during a 30-day comment period. Federal, state and local government offices, native groups, businesses and the general public sent comments to ADOT&PF. Many of these comments were incorporated by ADOT&PF in the Final SCIS of January, 1996, which was mailed out to approximately 80 individuals.

The Final SCIS concluded that the project would result in beneficial secondary impacts to all of the examined categories; environment, public safety and health, economics, government, education, transportation, lands, utilities and tourism. Expected cumulative impacts would be minor on government and social trends. No impacts were identified relating to possible Pebble Beach mine development. The visual environment and fish/wildlife resources would incur no meaningful cumulative impacts. Tourism development would not likely incur any cumulative impacts. The SCIS concluded the project would incur no impacts having a significant level.

After conducting a Cultural Resources survey, the Department of Natural Resources, State Historic Preservation Officer determined there are no cultural properties in the project area and issued a Finding of No Effect on October 18, 1996.

At ADOT&PF's request, Department of the Army Corps of Engineers Biologists conducted an on-site wetland determination for the project. They determined that a Section 10 permit would be required for the bridge crossing and a Nationwide Wetland permit for the road improvements.

CE- REEVALUATION

ADOT&PF reevaluated the CE, in light of the preceding studies, and concluded that the project would not result in any significant impacts to the social, economic, or natural environment and would not require further investigation or mitigation. The FHWA concurred with this finding on January 7, 1997.

RECENT DEVELOPMENTS

On May 29, 1997, the ASA, Alaska State Council of Trout Unlimited, Robert B. Gillam and William B. Wiener, Jr. filed a lawsuit in the United States District Court for the District of Alaska against the FHWA, the U.S. Department of Transportation and the U.S. Department of the Interior.

The 98-page complaint describes 21 Causes of

Action, including requests to (1) prepare an EIS, (2) consider other reasonable alternatives and (3) consider cost-benefit analyses. It challenges (1) the eligibility of 37 road projects for FHWA funding and (2) the FHWA/State of Alaska transportation planning process. It asks for an injunction to prohibit the FHWA from funding 37 road projects, including the Iliamna - Nondalton Road Improvements project.

DECISION TO DO AN ENVIRONMENTAL ASSESSMENT

The FHWA found the CE to be legally sufficient. Even so, after careful consideration of all the environmental documents and public input, the FHWA determined that further environmental analysis and public involvement would be beneficial to the FHWA, ADOT&PF and the public interest. The FHWA requested that ADOT&PF prepare an EA.

The EA will explore the Build Alternative and No Action Alternative, as well as additional reasonable alternatives respondents suggest during the re-scoping process.

RE-SCOPING PROCESS

ADOT&PF has begun a re-scoping process to solicit additional comments, concerns and suggestions from the public, interest groups and resource agencies for the EA development. It is specifically interested in social, economic or environmental impacts, possible mitigation measures for adverse impacts from the project, and to identify alternatives. Public Meetings are scheduled for October 27th in Iliamna, October 28th in Nondalton and November 4th in Anchorage. Scoping letters have been mailed to federal, state and local government agencies, businesses and the general public. Comments are due November 7, 1997.

PROPOSED ACTION, CONCEPT DESIGN

At this time, ADOT&PF proposes that the improvements closely match the original 1982 design, taking into account current road conditions and available funding. The intent is to finish a road which would provide basic, year-round transportation, require minimal maintenance and satisfy the purpose of providing improved overland transportation between Iliamna/Newhalen and Nondalton.

APPROXIMATE SCHEDULE

Prepare EA and Obtain Environmental Permits	1997-1999
Design	1999
Construction	2000

WRITTEN PUBLIC COMMENTS

Your input is an important element in the continued design of this project. To ensure that your views are considered, we have provided this sheet for your convenience. Comments should be returned to ADOT&PF by November 7, 1997.

ILIAMNA - NONDALTON ROAD IMPROVEMENTS

Project No. 51951

PUBLIC SCOPING MEETINGS:

- Monday, October 27, 1997 in Iliamna
- Tuesday, October 28, 1997 in Nondalton
- Tuesday, November 4, 1997 in Anchorage

(Please Print)

NAME:

MAILING ADDRESS:

CITY, STATE, ZIP:

COMMENTS

Note: To mail, fold along solid lines on the back of this sheet and tape or staple, so that the address is shown.

FOLD HERE FIRST

FOLD HERE SECOND

PLACE
STAMP
HERE

Susan N. Wick, Environmental Team Leader
Alaska Department of Transportation and Public Facilities
Preliminary Design and Environmental
P.O. Box 196900
Anchorage, AK 99519-6900

**ILIAMNA/NONDALTON ROAD IMPROVEMENTS
PROJECT NO. 51951
PUBLIC SCOPING MEETING/OPEN HOUSE FORMAT
ILIAMNA MEETING
LOCATION: ILIAMNA VILLAGE COUNCIL BUILDING
10/27/97 - 3-7 PM
MEETING NOTES**

The meeting began at 3 PM.

Susan explained the purpose of the meeting, the National Environmental Policy Act (NEPA) process, and DOT's need to obtain residents' ideas and concerns about improving transportation between the communities.

A Grader Operator (Bert), resident of Iliamna says: Nondalton residents can tell you the damage done to fish habitat by fording river with heavy equipment.

Education benefits: more interaction between students and teachers

"AA" Meets (Athletics/Academics) occur in spring for north area schools - all come together at school district expense. Kids would be afforded safer access to more diverse classes, events.

Emergencies - Fish & Wildlife Protection (FWP) officer says they could consolidate more services.

Would there be a concentration of services just in Iliamna? Response was generally - they already are.

Nondalton Regional Landfill: Region needs disposal area - residents in both Iliamna and Nondalton want to clean up the area and keep it clean.

Generally, there is cohesion between the 3 villages; no jealousy. Little chance of feuding. They have learned over time that they must work together.

Want to make sure the locals are hired and the road project is done right.

Three local residents went to work for Wilder on the Iliamna Airport construction project. One of them a resident of Nondalton, commuted via boat to/from Iliamna.

Bootlegging: to control it the road would help. The alcohol comes into Iliamna by plane.

Already there are Honda accidents along the road because of alcohol.

VPSO Trooper does a safety program already for 4-wheeler safety.

VPSO has the power to make arrests.

Used to be a State Trooper stationed here at one time.

Main form of transportation in Iliamna is 4-wheelers.

VPSO says if there was a trail parallel to the road, folks would use it. Now they use the roadway.

Indian Country: could be negative; people want to save the land.

Allotment owner: benefit and detriment - both access issues. The landowner can get places easier, but he may risk having others access his property easier.

Electric Co-op Iliamna/Newhalen/Nondalton Electric Cooperative (INNEC) got the easements and now Nondalton upset with INNEC - bickering over the years over easements.

Inter-native cooperation - Iliamna and Nondalton residents use each others' land areas.

Caribou: Locals hunt here. Caribou go across the roads.

Outsiders come in at Iliamna airport, but don't understand the land ownership status here. They hunt on Native Corporation lands/and trespass on them. Nondalton Kijik Corp. has a land marshall who informs visitors of land use rules, usually at the river edge.

Iliamna Natives Limited (INL) does not post their land; no NO TRESPASSING signs or other actions by INL to stem trespassers. Newhalen Corp. Alaska Peninsula Corp. will need to put up signs soon too.

The Corporations must police their land and be responsible for taking care of their land.

DOT suggested Native Corporations need land ownership signs at airport: visitors would read signs that said "private property". This would be a good time to start this process. Educate the visitors before they meet up with the land marshal.

Rich tourists do not spend money in Iliamna. They are the class of tourists that may flood in and Iliamna residents do not want them. The weekend tourists don't spend money in the local economy.

John Dickenson says the bridge construction cost is now estimated at \$3.5 million.

People are chartering planes into Anchorage to obtain health care.

All people in the 3 villages use the Anchorage hospitals. No others. Not even Dillingham.

Elderly care home needed in Iliamna.

There is trespassing on the Nondalton end of the bridge, boat launching occurs from that end.

Private launching spots at end of the bridge could impact the river.

INNEC would need access to the Tazimina power line and generator station. Question arose: How would INNEC access the power line easement if the ROW were to no longer exist?

Or, what would happen to the ROW if DOT did not build the road at all?

INNEC wants to put the power cable across the bridge so it won't have to worry about exposing the cable to ground traffic. At low water, the cable is exposed along the shoreline. Now it is buried under the lake and is a maintenance hassle. Safety problem of having an underwater cable now.

Socializing between the communities is already happening; but needs better connections.

Most feel the bridge would be a better alternative than any other.

A ferry system would not work. Residents ask, who would run it? It would have to be big enough to hold vehicles.

One resident felt a 2 lane bridge would better accommodate traffic. But when they found out the extra cost (doubled), he realized it might put the project in jeopardy on STIP list.

Jet boats land in Sixmile Lake and go beyond to Lake Clark.

Erosion: hardly any salmon have been coming into Iliamna recently.

Mail service to Nondalton now done by air.

Ice dangerous to drive on.

Could send fire trucks from one village to another.

Residents asked who would handle money if state put in road contract? Runway project only hired 2-3 local workers. Union dues problem for locals to afford.

Road/bridge would provide easier access to Corporation lands.

Road/bridge would also invite more trespassing.

People have used the INNEC easement as a road and this also promotes the trespass problem.

Power easement has deadline if road doesn't go in, then questions as to what happens. Is there such a document?

A big road from COMINCO to Cook Inlet would bring in many people and impact land.

Workers could commute easier from Nondalton to Iliamna jobs.

DUST - road would create dust and already berries are dusted.

Wassie Balluta (Native Allotment owner). HYDRO Plant- INNEC acquired some ROW from them. Wassie: is VP of Electric Co-op: they need to maintain the cables of INNEC, but the INNEC is member-owned.

Utility service is a basic necessity.

INNEC mechanic lives in Nondalton.

Power line is 24,000 volts. (would kill). At low water, power cable exposed out of water and is dangerous. Residents would like to see the electric cable go across bridge.

Diesel generator is in Newhalen. This is used for backup power generation.

Electricity is now used in all clinics, generated from Tazimina station.

INNEC needs the ROW regardless. Daily access/24 hours/day needed to Tazimina Hydro Plant.

Proposal for more power generation for Keyes Point and Pedro Bay.
Plant can be controlled remotely from Seattle.

One resident said DOT should look at the ferry/tram alternatives carefully, explore them. Several residents scoffed at these alternatives.

State already has a investment - State has spent \$5 million on the Tazimina Road.

Wassie and Fedosia (wife) residents of Newhalen.

Sue Arce - health clinic employee.

If people want jobs, they come to Iliamna.

Teachers fly back and forth all the time to teach classes. Costs the school district a lot of money.

Fire equipment good in Iliamna; could be shared with Nondalton. If fire in Nondalton now, Iliamna can't do much; all they can do now is send planeload of people. Can't transport the truck over.

State ROW issue. Wassie concern is that if someone gets hurt on DOT ROW, can DOT be held liable because DOT did not fix up the road? This liability issue should be explored.

Movement underway for Village Corporations to form 1 entity - combine the village corporations for unity.

Iliamna has CAT to do some maintenance.

Many bad spots in the road, you should count them for EA. Residents pointed them out on the road aerial photos and John Dickenson marked them.

Much joking about the 1/4 mile long, 3 foot "puddle".

No jobs here, so the kids move away.

In Nondalton, 2/3 of the kids moved out last year.

Health aide: asthma patients at clinic - lots of them; usually affects old and very young folks.

Sections where there is no gravel. More gravel added instead of silty sand would help. Silt forms many dust clouds.

Dust: Rick said he can tell exactly what time of the day it is when small or large planes take-off while he is 20 miles away on Lake Iliamna.

Dentist has set up 2 dental chairs at the Newhalen School to use as a clinic. But Nondalton folks can't always get there to use them.

Elderly - old folks want an old folks home "Elders Home" so they can die close to home. This is a cooperative project between the 3 communities.

Refuse a real big problem.

Park Service folks bring their garbage down to Nondalton from Port Alsworth.

Schools could have more vocational opportunities than they have now.

Heavy equipment is fording the river.

How often? For the last 3-4 years, Bert says usually once a year the equipment is brought over.

Equipment is rented for the year, but is used only for a few weeks. It sits until the next year.

Usually during April-May this is done. Makes for difficult planning of road and equipment

maintenance. Migration of equipment once a year. Permits are acquired from ADF&G.

Comments on the Draft Purpose and Need Statement:

Walt Wrede, Borough Manager, says include the following:

Create Jobs: more important than ever, because the fishing prognosis is not very good and welfare reform is taking effect. Of the 189 people in Nondalton, about 50% are on some form of public assistance. Figures from Walt.

Communities want more of the money, not money in the hands of a few.

Typical freight costs:

\$0.40 from ANC to ILI freight.

\$0.42 from Iliamna via Iliamna Air Taxi to Nondalton.

Yes, plywood is transported after it is cut up into 2 pieces.

With health care reform residents must travel to Anchorage and pay their own way.
Current rate is \$105 for a round trip fare charter ILIAMNA/NONDALTON.

Many, many tourists come here already. Summer boat traffic is high on river.
They don't help the local economies. They fly in and use the guide services, not local services.
Seldom see the visitors within Nondalton.

Village Council of Iliamna looking into the possibility of visitor income potential through:

1. Trails up to the mountain/hiking trails
2. B&Bs.

Sockeye salmon habitat along river bank.

DOT design minimizes the impact. Little digging in the bank, instead; in the water.

Bridge will mean increased access along the Nondalton side.

Kijik Corporation does not want bridge access/bridge fishing, but a Native Allotment owner or private property owner could develop their own land if they wanted to. Natives may want to put in a boat launch at the city area.

At the current "landing" folks are there already and launch boats all the time.

People will still go there and launch their boats, regardless of the bridge presence.

EPA Agency grants:

Village of Iliamna - to test water of tailings pond at COMINCO site. Iliamna residents could ask EPA about this road project and its impacts. Iliamna had a D.C. visitor last week talking about this program. Residents are worried about :

1. Former Army camps, FAA dump (asbestos)
2. Old State dump
3. High cancer rate? They wonder what is there?

Nondalton has an Americorps Program to haul out hazardous waste.

Susan explained this is an EA for a corridor.

Susan explained the NEPA process: it is not a majority vote, doesn't work that way.

Road construction:

Most materials will come from road ROW itself; no need to purchase materials from Corporations.

Explore 2-lane bridge as an option, but may not be reasonable because it is too expensive and cannot justify traffic levels.

CAT could cross the new bridge; would be large enough for CAT.

State M&O would maintain the road later, DOT does not expect the villages to do it now. Although the trend is to encourage the local residents to do more of it statewide.

Bridge doesn't require much maintenance; state needs to keep girders painted.

Barge use - Barges are about 15 feet tall but wouldn't be used much after the bridge is in.

Moody's barge service.

Wassie says mostly pleasure boats would pass under the bridge after it was built, not barges.

If road not built, what would happen? Scar on surface. State still responsible for the ROW?

Relinquish the ROW and plant vegetation? Residents would like to know.

Weather problems.

Ambulance stories.

Prices: Nearly \$3.00 gallon for heating oil.

Gasoline 2.80/G

AvGas 2.80/G

One resident says Moody's fuel service in Iliamna charges the same prices for fuel regardless of the mode of transport for incoming fuel shipments. No matter if it comes via Moody's Barge Service, the Everett barge from Kenai or via air transport. The last 2 years of low water restrictions have restricted barge shipments. So the last 2 years, fuel has been transported

primarily by air. Some cargo planes can land in Nondalton, only with an east wind, it can land OK. Flies directly from Kenai.

Mail hauled by one Air Taxi now.

Relatives in Nondalton/Iliamna; lots of intermixing and friendships, socializing.

Dances, social events.

Spring carnival in Nondalton every year.

Basketball games (high school and adult) at the schools.

Alternatives: Bridge safer than other alternatives, like floating bridge.

Resident expressed safety concern about 1 lane bridge. Engineer explained the sight distance is excellent, no conflict with highway design standards.

DOT asked about the alternative of a TRAM. No comments offered by locals.

Road maintained from landing to river by Nondalton. Nondalton gets state revenue sharing monies.

Villagers want to know how can they help? DOT emphasized that they should "tell us everything"; all of their ideas and concerns so we can explore them in the EA now. We don't want to find out about things at the 11th hour.

Two years of bad salmon harvests, water levels low, marketing infrastructure needed here.

Would decrease L&PB operating expenses.

Loosing fish: risk: fishermen loosing fish in order to cross the River.

Meeting ended at 7 PM. Susan thanked everyone for attending and offering their input.

END

C:\pro\iliamna\re-scoping\ili-mtg1.027

**ILIAMNA/NONDALTON ROAD IMPROVEMENTS
PROJECT NO. 51951
PUBLIC SCOPING MEETING/OPEN HOUSE FORMAT
NONDALTON MEETING
LOCATION: NONDALTON COMMUNITY BUILDING
10/28/97 - 2-5 PM
MEETING NOTES**

NOTE: This meeting was originally scheduled for and advertised to be held from 2 PM - 6 PM. However, in Iliamna, it was learned that because the Nondalton Airport lights were inoperable (and had been for some time), the return flight would have to be completed prior to nightfall. Thus, DOT had to close the meeting at 5 PM.

Mike Boleski lives at fish camp. He talked about "suicide hill", the Iliamna bank at the bridge site, and how slippery and dangerous it is.

Residents recounted several accidents and near drownings and a few drownings on the lake ice, while people were trying to cross the Newhalen River near Nondalton. Mental Health Aide was also rescued from cold river.

Tom Green says they apply to maintain x miles of roads, including the local Nondalton roads; there is no restriction on which miles they maintain. So they choose to use most of the money to maintain the Iliamna-Nondalton Road. There is not enough money from that one funding source to maintain the roads just within the City of Nondalton anyway.

Nondalton landfill project: Tom Green described "thermal oxidizer" (not exactly an incinerator) and how 5 cells are proposed; one to be used at a time to thermally process garbage, etc. Also plan to dispose of haz mat and haz waste at this site. Bob Blundell (DEC) has been working with them on this.

Susan reminded Tom that PHS and FHWA funds can be used to build access roads to disposal sites. Many projects are already in progress for PHS landfills and FHWA roads.

Nondalton has chosen 3 sites for the Thermal Oxidizer; one near the river, one by the gravel pit and one further away. They prefer the one nearest the river.

Current landfill is close to the Nondalton runway.

Gladys expressed concern that the road/bridge would increase the problems with alcohol/drugs getting into Nondalton. The problems are bad already; she sees them only getting worse. The VPSO does not control the situation and the Village Council doesn't do much either.

Tom Green says that the road would help the two VPSOs (one from Iliamna, one from Nondalton) to work together to solve crimes. Often the criminals get away because the VPSO has to stop at the river; he can't follow criminals all the way home. Also, if legal, Tom would like to start up a 4-wheeler registration system to track all licenses/owners so VPSOs know who is driving away from the scene of the crime. The Nondalton VPSO is a full-time employee. He performs alcohol responses nearly every night. He mainly works a night shift because of the predominance of alcohol problems. He occasionally does loose dog reports.

Many residents told of near misses with drownings in river; usually alcohol related, but not always. Health Aid (male) nearly drowned recently.

The cost of transportation related to school activities is very high. It cost \$2,000 for a plane charter recently, to transport a volleyball team from Nondalton to Iliamna. Residents can think of much better ways to spend their school dollars than charters between the villages.

At Tazimina, there are 2 generators, producing a total of 450 KW power, supplying the 3 villages. It is totally on line now. The Newhalen diesel plant is now on stand-by for a back-up power source. The cost of electricity is not expected to drop for another 2 years.

One resident asked about the idea of putting a gate near the bridge that could be locked at night.

The majority of residents attending spoke in favor of the road/bridge project. They think that they currently have a problem with drugs/alcohol and trespass but if a bridge is built "they and Kijik" will deal with what may amount to a small increase in users.

A couple of women said they sort of like the way things are like now; that they have a sense of privacy and security. However, they would be willing to accept change in return for the convenience of the bridge.

Nondalton has a spring carnival every year. All villages participate. Residents expressed the desire to have the road/bridge project completed so they can more easily traverse during such social occasions.

The runway at Nondalton cannot be lengthened because of ADF&G concerns; a stream.

**SIGN-IN-SHEET
PUBLIC MEETING**

ILIAMNA-NONDALTON ROAD IMPROVEMENTS

Project No. 51951

- Monday, October 27, 1997 in Iliamna
 Tuesday, October 28, 1997 in Nondalton
 Tuesday, November 4, 1997 in Anchorage

NAME: (please print)

ADDRESS:

1. William W. Jones Sr.	P.O. Box 46 Nondalton, AK 99640
2. Mike Kerkela	PO Box 003 Nondalton AK 99640
3. Agnes Alexie	PO Box 003 Nondalton AK 99640
4. Billy Tufon Jr.	P.O. Box 007 Nondalton ak 99640
5. Gladys Evans	NONDALTON, ak 99640
6. Petr Korkunov	Nondalton 99640
7. June Tracy	PO Box 25 nondalton AK 99640
8. Eva Helge	PO Box 062 Nondalton AK 99640
9. Mike Oskitt	P.O. Box 012 Nondalton AK 99640
10. Don Wright	Box 066 NONDALTON AK 99640
11. Tom Greene	P.O. Box 56 Nondalton AK. 99640
12. Jimmie Wilson	PO Box 05 " " "
13. Pauline V. Hobson	PO Box 033 Nondalton, ak. 99640
14. Gary Zachar	
15. Jimmie Balluta	PO Box 011 " " AK 99640
16. Steve Nelson	
17. Nancy Mellett	Box 008 NONDALTON, AK 99640
18. Mary Anne	Box 108 " " "
19. Elizabeth Balluta	Box 108 " " AK. 99640
20. Ada Trefon	Box 084 " " 99640
21. Harry Karsch	Box 035 NONDALTON AK 99640
22. Claudine Greer	Box 054 " " " " "

SIGN-IN-SHEET
PUBLIC MEETING
ILIAMNA-NONDALTON ROAD IMPROVEMENTS
Project No. 51951

- Monday, October 27, 1997 in Iliamna
- Tuesday, October 28, 1997 in Nondalton
- Tuesday, November 4, 1997 in Anchorage

NAME: (please print)

ADDRESS:

NAME:	ADDRESS:
1. Clyde Tsefon	Box 45 Nondalton AK 99640
2. Paul Cusma Jr.	Box 43 NONDALTON AK, 99640
3. Gust Evonoff R	Nondalton AK 99640
4.	
5.	
6.	
7.	
8.	
9.	
10.	
11.	
12.	
13.	
14.	
15.	
16.	
17.	
18.	
19.	
20.	
21.	
22.	
23.	
24.	
25.	
26.	

**ILIAMNA/NONDALTON ROAD IMPROVEMENTS
PROJECT NO. 51951
PUBLIC SCOPING MEETING/OPEN HOUSE FORMAT
ANCHORAGE MEETING**

LOCATION:

**DOT & PF, 4111 AVIATION DRIVE,
ANCHORAGE, AK
SECOND FLOOR CONFERENCE ROOM 11/4/97 - 3-7 PM**

MEETING NOTES

Eva, an employee of the Bristol Bay Health Corporation. Drug and Alcohol Abuse Counselor. In 1986, her husband went through ice on snowmobile, in 1995 she went through ice on snowmachine, in 1996 her son went through ice on a 4-wheeler. Plywood must be sawn in 2 pieces to fit into a plane for transport. As Mental Health Counselor, she would visit Iliamna a minimum of 2 times per week if the road and bridge were in.

Tom Greene said that 2 weeks ago, for a volleyball game with schoolkids, the charter to Iliamna with 9 kids cost \$2K.

Sonny, Manager of the ACC. is familiar with transport costs of Hondas. It costs him \$450 to ship one from Anchorage to Iliamna. and \$200-260 to ship one from Iliamna to Nondalton. Rule of thumb: up to 1/3 of costs of transportation could be saved. Very sure that minimum of 25% of costs could be saved.

Birchwood Air Service can have good rates.

ERA has good rates but does not go to Nondalton.

1995 was the last accident - a 4 wheeler went thru the ice, a person was rescued.

Tom Greene will compile accident statistics for DOT.

Eva says that 93% of all arrests in Nondalton are alcohol related.

If the road and bridge were in, there would be trespass issues: trespass on berry patches.

Alcohol transport "happens all the time" now. Visual monitoring would help. Eva says "booze comes in on daily basis now."

Growth undesirable in some ways.

Because of ADF&G they can't lengthen the Nondalton runway.

1993-4 - DOT spent money to fix the Nondalton runway, now it is less safe than before.

The new fence adds 1.5 miles to the commute to and from the ND airport.

"Compact" - The 3 villages would like to work together - They have a dream is to build a hospital at Iliamna.

Bristol Bay Health Corporation Service Area consists of: Pedro Bay, Iliamna/Nondalton, Kokanok and Levelock.

Bicycles are taken by residents in boats back and forth for transportation.

Sport fisherman - most of them fly out and go elsewhere; they go to Tazimina but mostly all other outlying places.

It would be a good day adventure for sport fishermen to go float to fish the rapids.

No concentration of fishing at the bridge site now; only the locals usually.

The Landing is a popular place to go fishing.

Fish camp activities - residents put up salmon for the winter, seasonal use only.

Aesthetics: of Bridge. Kijik sees this as an objection. But Mr. Gillam's cabin on Keyes Point is also eyesore to the residents of Nondalton.

INNEC has put up 2 lights along their easement to keep people away from the power lines.

Not unusual to have people go through the ice.

Kijik Corp. had grandiose plans for a town at one time at Keyes Point. Gilliam and Hickel were going to provide cash for the project.

HUD Disclosure Statement for Keyes Point property owners is available from Eleanor at Kijik. Subdivision Plan was filed with ADEC, dealing with utilities, etc. around 1982 or so; Jim Forbes will look into it.

Eleanor said that Gilliam wanted to extend the right-of-way at Keyes Point. He wants Lear Jet access into his area.

One resident said Gilliam wants a "private paradise."

Trout Unlimited: Greene says, "Why are they involved, Jeff?". Jeff invoked his attorney-client privilege and did not answer.

At the Nondalton Airport -the airport lights are on again, reported Tom Greene.

Kijik Corp. Trespass Officer works 3-4 months of the year, 8 hour days, 5 days per week, checks on all visitors to Kijik land and all trespassers.

Kijik has a "Land Use Permit" System.

One fish camp resident said: At fish camp, she watched: at 4 AM as people started on utility road (trespass) Air Taxis encourage fishermen to use that route.

Does Kijik have plans to regulate? Eleanor says they already do, with Trespass Officer. Kijik distributes flyers to all of the air taxis to distribute to visitors; they have no control whether the info IS distributed.

Kijik sees berry paths torn up, garbage wherever visitors are.

Nonconsumptive uses - Kijik sells permits. Kijik sends notices to all lodges, air taxis, Anchorage Daily News and Bristol Bay Times about the Permit System. They can't control what happens afterwards. They did not think that Iliamna Natives Limited did this.

In a 1974 meeting held at Nondalton; natives wanted the road. Then a bunch of white air taxi owners came into the meeting, convinced all of the natives to change their minds, and the vote was turned around. So they voted against the road.

Locals very dependent on air taxi costs.

Iliamna Air Taxi has monopoly in the area. Reliable and stable air carrier.

Others in the regions are: Birchwood Air Service, Lake Clark Air and Dave Wilder. But these three cannot compete with Iliamna Air Taxi and are not as reliable.

A round trip fare between Nondalton and Anchorage is cheaper than a round trip airfare between Nondalton and Iliamna.

People on fixed incomes are hurt the worst.

Money goes much further in Iliamna.

People who have jobs stick with them until they retire.

Kijik Board of Directors - people of Nondalton have asked for their help in getting this project done. If the road and bridge were there, it would help drivers stay on the road ROW.

Kijik has logging and firewood permitting system. Permits are issued by Kijik to protect renewable resources. Some people rely on wood heat; everyone does during power outages.

Iliamna power costs about 0.50 per KWH.

Spruce Beetles are coming to this region.

DOT expects the EA to be finalised by January 1999.

No other environmental organizations are on bandwagon.

Eleanor says there are 200 landowners at Keyes Point now. We've only heard from one of them.

Tom Greene said it costs \$0.40 per pound to ship groceries from Iliamna to Nondalton. It is very expensive to order groceries.

\$600,000 per year business is done at the Nondalton Grocery Store for 237 people in Nondalton; about 65% of that is business in food stamps.

When they travel to Anchorage, locals stay with Anchorage relatives and friends to save money.

Construction on Keyes Point, 16-17 HERCs were used to transport construction materials to the Gillam construction site.

People from Nondalton cannot use the Keyes Point airstrip; it is a private airstrip.

HUD houses are being built in Nondalton. It is very expensive to transport materials to Nondalton.

Jeff Parker said he will send written comments prior to the November 7th deadline. He wanted to remind DOT to abide by the statute dealing with fraudulent statements (18 USC1020).

Jeff thinks DOT's scoping process needs to be in the federal register; like an EIS (unless FHWA says no).

Jeff says scoping is a weeding out process. It should identify ALL of the issues raised in the ASA, complaint and all DOT files. Jeff questioned what is the specific role that DOT is playing in this EA process. What is DOT's role? (based on scoping letter, he can't tell)

He says the Iliamna-Nondalton Road does not exist beyond Alexcy Creek.

Is DOT doing the EA? Jeff would like a copy of the distribution list used for the scoping letter.

Jeff wants DOT to look at the 8 priorities noted in the CEQ regulations. He thinks that DOT and FHWA are lead cooperating agencies, as explained in the CEQ regulations. What other EISs are being prepared for the area? He thinks there are some. Can't CE a STIP. Integrate Environmental planning with ISTEPA planning. Jeff says this has not been done. He says DOT needs to Integrate the timing, too. He noted there is a schedule on the summary sheet. He questions whether DOT has complied with CEQ regulation 1501.7A6 and 7.

He has examined the ISTEPA planning criteria. VISION 2020 must be consistent with this.

Specific issues. Jeff would like the following addressed in the EA:

1. Is the route currently a public road?
2. Who owns the right-of-way in question?
3. What are the full costs of construction and at what standards? He has seen estimates ranging from 5.5-20 million dollars.
4. What are the projected maintenance costs for the road and bridge?
5. Why is the road economically justified now, when it wasn't previously?
6. ADF&G comments; Al Carson's comments from 1/6/97.
7. Rainbow Trout - age and size distribution - fish that migrate in the Kvikchak drainage.
8. Trout Management Plan -what is the impact ?
9. Impact on crowding - increased levels of land use.
10. Economic value associated with 4 things;
 1. crowding
 2. target species (rainbow trout is the leading target)
 3. amenities
 4. different levels of use
11. Why is the cost of the road an effective strategy? The Nondalton Airport improvements cost a lot of money.
12. Rural minor collector;STP monies. Is this a legal use of the federal money?
13. What are the costs involved in the use of the road?
14. A cost/benefit analysis is needed.
Jeff wants another study done.

Cost of owning a vehicle in Nondalton. Jeff says costs of using road will be greater for residents in Nondalton and that doesn't include the costs of road maintenance. But Eleanor says no, not all residents would purchase or get a vehicle anyway. And Tom Greene says that he and most others already have vehicle costs in the form of 4-wheeler costs, so all is not true.

Tom asks, so the cost/benefit study is a bogus report?

It appalled Eleanor that ONE outsider can hurt so many people.

Greene asked if Jeff Parker had spoken with any other conservation organizations like the Alaska Center for the Environment, Trustees for Alaska, etc. Jeff invoked his Attorney-Client Privilege and did not answer the question.

Jeff Parker disputes the DOT statement that, "widening the existing embankment" characterizes the road portion from the bridge site to Nondalton. He says this is not true. It's actually "a two-wheel rut across the tundra".

But, Jeff admitted that he hasn't seen this part of the road from the air yet.

Dragging heavy equipment across the river, according to Eleanor, destroys berry patches.

Tom Greene is critical of Parker's clients' motives and posed a question: If DOT prepares the "perfect EA or EIS" and concludes the project should be built, would the client then be happy, or sue to stop the project anyway?

END

C:\pro\liamna\re-scope\anc-mtg1.104

**SIGN-IN-SHEET
PUBLIC MEETING
ILIAMNA-NONDALTON ROAD IMPROVEMENTS
Project No. 51951**

- Monday, October 27, 1997 in Iliamna
 Tuesday, October 28, 1997 in Nondalton
 Tuesday, November 4, 1997 in Anchorage

NAME: (please print)

ADDRESS:

1. Tom Greene	P.O. Box 56 Nondalton, AK 99640
2. WALT WREDE	P.O. Box 48 KING SALMON AK 99611
3. MARK DARTON	402R ALASKA 2525 C St. ANCHORAGE AK 99503
4. MARK HICKEY	211 211 4TH ST; SUITE 108 JUNEAU, AK 99801
5. JAK MOORE	800 Cordova Street ANCH AK 99501
6. Chester Murphy	" " "
7. April Ferguson	800 Cordova Street Anch AK 99501
8. Jim Cantor	A D O C
9. Jim Forbes	135 CHRISTENSEN DR #300 ANCH AK 99501
10. Eva Leveque	P.O. 062 Nondalton, AK 99640
11. ^{the twin} Mark Leveque	P.O. 62 Nondalton, AK 99640
12. Paul C. Kochl, BRNK	300 Cordova, Anchorage, AK 99501
13. Granville Johnson	4155 Tudor Centre Dr. Ste 104 Anchorage, Alaska
14. Benjamin Hoff	1205 W. 47 th #4 Anchorage AK 99503
15. Adolph JACKINSKY	1205 W 47th #4 ANCHORAGE, AK 99503
16. Anita R. Carlitkoff	4155 Tudor Centre Dr #104 Anch AK 99517
17. Jeff Parker	500 C St #502 Anchorage AK 99501
18. Nellie Drew	9499 Prayton Dr Sp 165 Anch AK 99508
19. Robert Drew	Same as above



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
 P.O. BOX 898
 ANCHORAGE, ALASKA 99506-0898

RECEIVED

NOV 12 '97

REPLY TO
 ATTENTION OF:

NOVEMBER 05 1997

Regulatory Branch
 South Section
 9-830477

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr. J. Dickerson		
Locations		
Env. Team Leader		
Staff HLN		
CSN		
Project File		
Central File		

Ms. Susan Wick
 Alaska Department of Transportation
 and Public Facilities
 Post Office Box 196900
 Anchorage, Alaska 99519-6900

Dear Ms. Wick:

This is in response to your letter dated October 7, 1997, requesting re-scoping comments for your proposed Iliamna Road Improvements project at Iliamna, Alaska, in section 1, T. 3 S., R. 33 W., Seward Meridian, between the Village of Iliamna and the City of Nondalton, Alaska.

Your proposed project was reviewed pursuant to Section 404 of the Clean Water Act, and Section 10 of the Rivers and Harbors Act. Section 404 of the Clean Water Act requires that a Department of the Army (DA) permit be obtained for the placement of discharge or dredged and/or fill material into waters of the United States (U.S.), including wetlands, prior to conducting the work (33 U.S.C. 1344). Section 10 of the Rivers and Harbors Act requires that a DA permit be obtained for work in or affecting navigable waters of the U.S. (33 U.S.C. 403).

Based on our review of the information you furnished, aerial photography, and an on-site jurisdictional determination on October 4, 1996, we have determined that the discharge of dredged and/or fill material into waters of the U.S. will be necessary for this project. Therefore, the project will require a DA permit pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act. The specific type of permit will be determined after the submittal of your application.

Please be aware that any additional work in wetlands outside the actual roadway footprint, such as the borrow pits and any additional excavation or fill areas would also be subject to DA authorization and should be included in the final plans.

I have enclosed a copy of the Flood Hazard Data for the community of Nondalton from the U.S. Army Corps of Engineers Alaskan Communities Flood Hazard Data of 1993. The only other floodplain data we have available comes from the Coast Guard Public Notice 17-01-88 dated January 28, 1988. This notice states that the 100-year flood elevation is 354.6 feet above mean sea level.

In accordance with the Interagency Working Agreement to Integrate Section 404 and Related Permit Requirements Into the National Environmental Policy Act (MOU) of June 6, 1996, I have enclosed the Interagency Working Agreement Concurrence Form. I find the project Statement of Purpose and Need to be in concurrence with Section 404 of the Clean Water Act.

In an effort to determine the level of customer satisfaction with the services provided to you, the Regulatory Branch asks that you take a few moments to provide us with any constructive comments you feel are appropriate by filling out the enclosed questionnaire. Our interest is to see how we can continue to improve our service to you, our customer, and how best to achieve these improvements. Additional comments may be provided through the use of an oral exit interview, which is available to you upon request. Your efforts and interest in evaluating the regulatory program are much appreciated.

We appreciate your cooperation with the Corps of Engineers Regulatory Program. Should you have any questions concerning this determination, please contact me at the address above, ATTN: CEPOA-CO-R-S, or by telephone at (907) 753-2724, or by FAX at (907) 753-5567.

Sincerely,



Kathleen J. Kuná
Project Manager

Enclosures

ALASKAN COMMUNITIES FLOOD HAZARD DATA 1993
U.S. ARMY CORPS OF ENGINEERS - FLOOD PLAIN MANAGEMENT SERVICES

COMMUNITY: NONDALTON

LONGITUDE: 154 deg. 51 min. West	STATUS: 2d Class City
LATITUDE: 59 deg. 58 min. North	POPULATION: 229
BOROUGH: Lake and Peninsula	HOUSES: 58
COMMUNITY MAYOR: Craig Evanoff	

COMMUNITY SERVICES

WATER SUPPLY: Storage Tank	COMMUNICATIONS: Radiophone
ELECTRICAL SOURCE: Diesel Generator	SEWAGE TREATMENT: Stabilization Ponds
ECONOMIC BASE: Subsistence Hunting & Fishing	TRANSPORTATION: Aircraft Only

MAPS AVAILABLE AT ALASKA DISTRICT

MAP/YEAR: Yes/1965	MAP SCALE: 1" = 50'
MAPPED BY: Bureau of Land Management	TOPOGRAPHIC: Yes
FLOOD PLAIN MARKED: Yes	AERIAL PHOTOS: Yes
	PHOTOGRAPHS: Black-White/Aerial, USACE

FLOOD DATA

RIVER SYSTEM:	NFIP STATUS: Not Participating
COASTAL AREA: Sixmile Lake	FLOOD PLAIN INFO. REPORT: No
LAST FLOOD EVENT: ELEVATION:	FLOOD INSURANCE STUDY: Yes/1974
FLOOD CAUSE:	FLOOD INSURANCE STUDY TYPE: 7
WORST FLOOD EVENT: ELEVATION:	<u>PROPERTY IN FLOOD PLAIN</u>
FLOOD CAUSE:	HOUSES:
	PUBLIC FACILITIES:

COMMENTS:

Flood hazard high. 80 percent of the village is located on small hills.
 In July of 1975 there was 2 feet of water on a portion of the runway.

NONDALTON

**Interagency Working Agreement
Concurrence Form**

Project Description: Iliamna-Nondalton Road Improvements

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 11/26/97

Concurrence Point

Purpose & Need

Alternatives to be Analyzed

Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

Concurrence ¹

Nonconcurrence ²

Nonparticipation by choice ³

Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: _____

US Army Corps of Engineers CO-R-S
Agency

Kathleen Kuna
Signature

11-5-97
Date

Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

Nonparticipation by constraint means that the agency A-169 have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

Interagency Working Agreement Concurrence Form

Project Description: Diamna-Nondalton Road Improvements

MAR 19 '98

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 4/18/98

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		<input checked="" type="checkbox"/>
Project Mgr.		<input checked="" type="checkbox"/>
Locations		
Env. Team Leader		<input checked="" type="checkbox"/>
Staff		<input checked="" type="checkbox"/>
Project File		<input checked="" type="checkbox"/>
Central File		<input checked="" type="checkbox"/>

Concurrence Point

- Purpose & Need
 Alternatives to be Analyzed
 Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

- Concurrence ¹
 Nonconcurrence ²
 Nonparticipation by choice ³
 Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: _____

US Army Corps of Engineers
Agency CO-R-S

Kathleen Kuna
Signature

3-16-98
Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

INTERAGENCY WORKING AGREEMENT CONCURRENCE FORM

RECEIVED

SEP 09 '99

Project Description: **ILLIAMNA-NONDALTON ROAD IMPROVEMENTS**

State Project #: 51951 Federal Project #: STP-0214(3)

Environmental Document: EA Date Concurrence Due: 9/6/99

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr. Dickerson		
Env. Coord. JR	1	
Env. Team Leader	/	
Staff		
Hydrologist		
Project File		2
Central File	/	

Concurrence Point

- Purpose & Need
 Alternatives to be analyzed
 Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative by his/her signature to this document signifies one of the following:

- Concurrence¹
 Nonconcurrence²
 Non-participation by choice³
 Non-participation by constraint⁴

Comments/Reasons for nonconcurrence:

US Army Corps Agency
 Victor O. Ross Signature
 9/3/99 Date

¹ Concurrence means that the information is adequate for the state under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not be construed as nonparticipation by choice.


Please return form to: Jerry O. Ruehle, Environmental Coordinator, Preliminary Design and Environmental Section, Box 196900, Anchorage, Alaska 99519-6900.

**STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN & ENVIRONMENTAL**

TELEPHONE RECORD

DATE September 17, 1999
TIME 11:44 am

FROM Victor Ross
POSITION Project Manager
REPRESENTING COE
LOCATION Anchorage

TO Susan Wick 
TITLE Environmental Team Leader
PROJECT Iliamna-Nondalton
PROJECT NO. 51951
REGARDING preliminary draft EA

Mr. Ross returned my call to let me know that due to his workload and the belief he had that the draft EA had the information he would need to complete a Section 404(b)1 analysis he wouldn't be commenting on the preliminary draft EA.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
 222 W. 7th Avenue, #43
 Anchorage, Alaska 99513-7577

DEC 10 '97

November 17, 1997

Ms. Susan N. Wick
 Environmental Team Leader,
 Central Region
 Alaska Department of Transportation
 & Public Facilities
 4111 Aviation Ave.
 P.O. Box 196900
 Anchorage, Alaska 99519-6900

RE: Iliamna-Nondalton Road

	COPY	ACTION
Prelim. Design & Environmental Section		
PD & E Engr.		
Project Mgr. <i>Dickenson</i>		
Locations		
Inv. Team <i>DSV</i>		
Staff <i>RL</i>		
Project File		
Central File		<i>/</i>

Dear Ms. Wick:

The National Marine Fisheries Service has reviewed the scoping letter for the above referenced project. The proposed project is to upgrade and improve road access between the Village of Iliamna and the City of Nondalton. The project involves the crossing of the Newhalen River using a 540 foot long, 17 foot wide steel girder bridge having four piers.

We understand you have held several public meetings on the proposed project, and have been coordinating with the Alaska Department of Fish and Game (ADF&G). We support this effort and are willing to assist you with those resource issues that have been identified as a result of the scoping process. We have reviewed the comments from the ADF&G and support their recommendations.

However, please be advised that prior to concurring with the purpose and need of this project, the information gathered from the scoping process should be provided to the resource agencies. Any concerns regarding resources should be provided to the appropriate agency so that those concerns may be factored into the agency's recommendation.

Thank you for the opportunity to comment.

Sincerely,

Brad K. Smith
 Acting Supervisor
 Western Alaska Field Office

NMFS Contact Person: Jeanne L. Hanson

cc: USFWS, DGC, ADFG, ADEC - Fairbanks
 EPA - Anchorage



Interagency Working Agreement Concurrence Form

OPTIONAL FORM NO. (7-80)

FAX TRANSMITTAL

To: Helen

Dept./Agency: _____

From: Jeanne

Phone #: _____

Fax #: 243-6927

Fax #: 271-3030

NSN 7540-01-317-7898

5009-101

GENERAL SERVICES ADMINISTRATION

of pages ->

Project Description: Iliamna-Nondalton Road Improvements

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 11/26/97

Concurrence Point

- Purpose & Need Alternatives to be Analyzed
- Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

RECEIVED
DEC 08 '97

- Concurrence ¹ Nonconcurrence ²
- Nonparticipation by choice ³ Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: See letter

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr. <u>DICKERSON</u>		
Locations		
Env. Team Leader		
Staff <u>HL</u>		
Project File		
entral File		
		<u>12/08/97</u>

NMES
Agency

Jeanne
Signature

12/08/97
Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

RECEIVED

Interagency Working Agreement
Concurrence Form

OCT 14 '99

Project Description: ILIAMNA-NONDALTON ROAD IMPROVEMENTS
State Project #: 51951
Federal Project#: STP-0214(3)
Environmental Document: EA
Date Concurrence Due: 9/6/99

Public Design & Environmental Section	Open	ACTION
PD&E Eng.	<i>[Signature]</i>	
Project Mgr.	<i>[Signature]</i>	
Env. Coord.		
Env. Team Leader	<i>[Signature]</i>	
Staff		
Hydrologist		
Project File		<i>[Signature]</i>
Central File		<i>[Signature]</i>

Concurrence Point

Purpose & Need Alternatives to be Analyzed Preferred Alternative

Concurrence Response

51951

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

Concurrence¹ Nonconcurrence²
 Nonparticipation by choice³ Nonparticipation by constraint⁴

Comments/Items to Resolve at Next Stage:

Assess need and design access point for recreational user/boat launch at bridge.

Ensure culverts provide adequate flow for fish passage.

Follow timing restrictions established by ADF&G to include (at a minimum) no in-water work July through September to avoid impacts to anadromous fish.

(Form is past due: waiting to speak with ADF&G after site investigation.)

National Marine Fisheries Service
Agency

[Signature]
Signature

10/14/99
Date

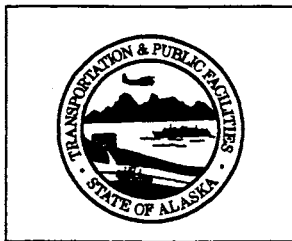
¹Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

²Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not be construed as nonparticipation by choice.

Please return form to: Jerry O. Ruehle, Environmental Coordinator, Preliminary Design and Environmental Section, Box 196900, Anchorage, Alaska, 99519-6900



STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
CENTRAL REGION - DESIGN & CONSTRUCTION
PRELIMINARY DESIGN & ENVIRONMENTAL SECTION

TELEPHONE RECORD

DATE: December 9, 1997

TIME: 2:30 pm

FROM: Heather Dean

REPRESENTING: EPA

PHONE: ²371-5083

LOCATION: Anchorage

TO: Helen Lons

PROJECT: Iliamna-Nondalton Road Improvements

PROJECT NO.: 51951

SUBJECT: Re-scoping Comments and Purpose and Need Concurrence

I called Heather to follow up on the re-scoping letter response and concurrence with the Purpose and Need Statement. She indicated that due to time constraints, EPA would be unable to offer any scoping comments at this time. However, she stated EPA would fax DOT&PF a completed Concurrence Form to satisfy the NEPA/Section 404 Merger Agreement process.

Interagency Working Agreement Concurrence Form

Project Description: Iliamna-Nondalton Road Improvements

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 11/26/97

Concurrence Point

Purpose & Need

Alternatives to be Analyzed

Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

Concurrence ¹

Nonconcurrence ²

Nonparticipation by choice ³

Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: _____

E.P.A.
Agency

Heather Dean
Signature

12/12/97
Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

Interagency Working Agreement Concurrence Form

Project Description: Diana-Nondalton Road Improvements

State Project #: 51951 Federal Project #: STP-0214(3)

Environmental Document: EA Date Concurrence Due: 4/18/98

Concurrence Point

- Purpose & Need Alternatives to be Analyzed
 Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative by his/her signature to this document signifies one of the following:

AUG 07 '98

- Concurrence ¹ Nonconcurrence ²
 Nonparticipation by choice ³ Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: _____

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr. <i>Dickinson</i>		
Locations		
Env. Team Lead <i>W</i>		
Staff		
Project File		
Central File		

EPA
 Agency

Heather Dean
 Signature

8/5/98
 Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

OPTIONAL FORM 99 (7-90)
 FAX TRANSMITTAL
 # of pages: 1
 From: *Heather Dean*
 Dept./Agency: _____
 Phone #: _____
 Fax #: _____
 GENERAL SERVICES ADMINISTRATION
 5009-101 5009-101

INTERAGENCY WORKING AGREEMENT CONCURRENCE FORM

Project Description: **ILIAMNA-NONDALTON ROAD IMPROVEMENTS**

State Project #: 51951 Federal Project #: STP-0214(3)

Environmental Document: EA Date Concurrence Due: 9/6/99

Concurrence Point

- Purpose & Need
- Alternatives to be analyzed
- Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative by his/her signature to this document signifies one of the following:

- Concurrence¹
- Nonconcurrence²
- Non-participation by choice³
- Non-participation by constraint⁴

Comments/Reasons for nonconcurrence:

EPA
Agency

Weather Dean
Signature

8/3/99
Date

¹ Concurrence means that the information is adequate for the state under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not be construed as nonparticipation by choice.

Please return form to: *Jerry O. Ruehle, Environmental Coordinator, Preliminary Design and Environmental Section, Box 196900, Anchorage, Alaska 99519-6900.*

HI/FORMS/INTERAGENCY WORKING AGREEMENT

OPTIONAL FORM 98 (7-80)

FAX TRANSMITTAL

of pages **1**

From Weather Dean Phone # _____ Fax # _____

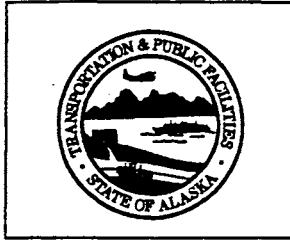
To Jackie Dept./Agency _____

Fax NSMCS-00-01-317-008 GENERAL SERVICES ADMINISTRATION 5099-101

RECEIVED

AUG 03 '99

Prelim. Design & Environmental Section	ADD
PD&E Engr.	
Project Mgr.	DICKER
Env. Coord.	
Env. Team Lead	
Staff	15
Hydrologist	
Project File	
Central File	



STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
CENTRAL REGION - DESIGN & CONSTRUCTION
PRELIMINARY DESIGN & ENVIRONMENTAL SECTION

TELEPHONE RECORD

DATE: December 11, 1997

FROM: Gary Wheeler

REPRESENTING: U.S. Fish & Wildlife Service

PHONE: 271-2780

LOCATION: Anchorage

TO: Helen Lons

PROJECT: Iliamna-Nondalton Road Improvements

PROJECT NO.: 51951

SUBJECT: Scoping Comments

Gary Wheeler left a message stating that he has no concerns or comments about the project at this time. This project does not have a top priority compared with his others which have much greater impacts. He has no objections with DOT&PF proceeding with the project. He may provide further comments at a later date.

cc: John Dickenson, P.E., Project Manager
Susan Wick, Environmental Team Leader

**STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN & ENVIRONMENTAL**

TELEPHONE RECORD

DATE October 5, 1998
TIME 8:45 am

TO Gary Wheeler
POSITION Biologist
REPRESENTING USF&WS
LOCATION Anchorage, Alaska
TELEPHONE (907) 271-2780

FROM Susan N. Wick
TITLE Environmental Team Leader
PROJECT Iliamna-Nondalton Road Improvements
PROJECT NO. 51951
REGARDING Range of Alternatives comments/concurrence form

I called Gary for three things

1. To get a clarification of his December 11, 1997 phone conversation with HelenLons in which he stated his agency had no concerns or comments on the project at the time. I wanted to know if his statement meant that there are no threatened and endangered species in the area and he said that was correct, there are no threatened and endangered species in the area.
2. To find out if he was going to comment on the range of alternatives paper sent to him in February. He said no they were too busy.
3. And lastly I asked if he would be signing the Alternatives to be analyzed concurrence form and he said no for the reasons they were too busy and since they weren't a signatory agency he would not be signing it.

cc: Gary Wheeler, Biologist, USFWS



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services Anchorage
605 West 4th Avenue, Room 62
Anchorage, Alaska 99501-2249



NOV 10 '99

WAES

Jerry O. Ruehle
Environmental Coordinator
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, Alaska 99519-6900

Re: Iliamna-Nondalton Road Improvements
Preliminary Draft EA

NOV - 8 - 1999

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Eng.		
Project Mgt		
Env. Coord.		
Env. Team Leader		
Staff		
Hydrologist		
Project File		
Central File		

Dear Mr Ruehle:

We have reviewed the preliminary draft Environmental Assessment for the subject project and have the following comments.

51951

We concur with the selection of your preferred alternative; however, we would like to see the east abutment of the Newhalen River bridge moved back away from the river so that there would not need to be riprap deposited below the ordinary high water line and no constriction of the natural stream channel. The addition of at least five bridge piers to the river will probably change the hydraulic characteristics of the stream to a small degree. The addition of riprap would add to that change; consequently, if the channel is constricted at the bridge crossing, flows would tend to increase in velocity in the vicinity of the bridge and erode the channel and streambanks downstream of the bridge reach. We believe these would be detrimental changes for the fisheries resources of the Newhalen River.

We would also like to reiterate comments provided by the Alaska Department of Fish and Game. It appears that culverts providing passage under the roadway for several streams are undersized, perched, and causing substantial erosion and sediment deposition in the stream. Specifically, culverts on the South Fork Alexy Creek and two streams on the road from Nondalton to the materials site west of the village are blocking fish passage. In addition, the road embankments at Lovers Creek and South Fork Alexy creek are eroding badly and depositing a substantial amount of sediment into the streams. The project should be designed to rectify this situation. Also, public access to the Newhalen River is likely to continue. If an access point is not designed into the project, it is likely that unofficial angler trails will extend across the right-of-way from the roadway to the river, likely resulting in erosion and deposition of a substantial amount of sediment into the river. We would prefer that a controlled trail and access point be designed into the project.

We have one editorial comment. On the lower drawing on Figure 3, the north arrow and streamflow arrow appear to be 180 degrees from the proper direction.

We appreciate the opportunity to provide these early comments on your Preliminary Draft EA. If you have any questions, please contact project biologist Gary Wheeler at 271-2780.

Sincerely,



Acting for
Ann G. Rappoport
Field Supervisor

STATE OF ALASKA

TONY KNOWLES, GOVERNOR

555 Cordova St.
Anchorage, AK 99501-2617
PHONE: (907) 269-7634
FAX: (907) 269-7678
<http://www.state.ak.us/dec/home.htm>

DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF STATEWIDE PUBLIC SERVICE

November 24, 1997

Susan Wick
Department of Transportation and Public Facilities
4111 Aviation Avenue
P.O. Box 196900
Anchorage, AK 99519-6900

Dear Ms. Wick:

We received the information you provided about the Iliamna Road Improvements Project No. STP -0214(3)51951. You have our previous comments from 1995 on this project, which remain valid at this phase.

Thank you for the opportunity to comment. If you have any questions, please contact me at 269-7635.

Sincerely,

Marianne G. See
Director

MS/mk (g:ec-cler/mk/Iliamna)

cc: Water Quality Program

RECEIVED

NOV 25 '97

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr. J. Dickenson		
Locations		
Env. Team Leader		
Staff HLN		
Project File		
Central File		

Interagency Working Agreement Concurrence Form

Project Description: Iliamna-Nondalton Road Improvements

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 11/26/97

Concurrence Point

Purpose & Need

Alternatives to be Analyzed

Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

Concurrence¹

Nonconcurrence²

Nonparticipation by choice³

Nonparticipation by constraint⁴

Comments/Reasons for nonconcurrence: _____

ADEL
Agency

Marianne G. See
Signature

24 Nov 97
Date

Marianne G. See

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency A-187 have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

**DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF STATEWIDE PUBLIC SERVICE
DIRECTOR'S OFFICE**

TONY KNOWLES, GOVERNOR
555 Cordova St.
Anchorage, AK 99501-2617
PHONE: (907) 269-7634
FAX: (907) 269-7678
<http://www.state.ak.us/dec/home.htm>

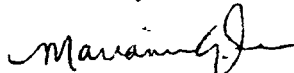
April 20, 1998

Susan N. Wick
4111 Aviation Avenue
PO Box 196900
Anchorage, AK 99519-6900

Dear Ms. Wick:

The only comments received on Iliamna-Nondalton Road Improvements Project No. STP-0214(3)51951 was a printout from our Contaminated Sites program and attached is the Interagency Working Agreement Concurrence Form.

Sincerely,



Marianne G. See
Director

Enclosures

MS/mk (iliamna-nondalton)

Contaminated Site Data and Actions For: 9025011002

Generic Name:	Airport Iliamna	Company:	Nondalton Native Fuel Service	Elect. District:	HS-40	File No:	CS
Facility Name:	Iliamna Airport	Lead RP:	Eleanor M. C. Johnson Manager	Just :			
Facility:	Lot 2b Iliamna Airport	Mailing:	4155 Tudor Centre Dr. 104	Prog :	IN	Landowner:	CV
Address:		Address:		Facility ID # :			
City/State/Zip:	Iliamna AK 99606	City/State/Zip:	Anchorage AK 99508	Staff:	Closed		
Telephone:	907 571 1400	Telephone:	907 561 4487	Ranking Score:			
		Ledger Code:		Priority:	9	Status:	cl
Latitude:	59.754710						
Longitude:	-154.906090						
Legal:							

Problem: 4/20/85 3,000 gallons of diesel fuel mixed with aviation gasoline discharged from tank onto wetlands (muskeg). Site cleaned up except for tilling of soil, returning soil & chemical analysis. Site still open because no results of final disposal/treatment of contaminated soils received.

Comments: Martech USA Inc. contracted (by NNFSI) out as cleanup contractor & was supposed to do a final site inspection prior to end of summer of '90. Last staff assigned were Eng and Olson.

Actions:

Code	Description	Date	Action Staff	Status
SC	* Site Control (Emerg. Re	04/20/1990		Nondalton Native Fuel Services Inc. in process of recovering fuel spill with mobile tank crew and absorbent pads. Valve was opened by suspected vandals. Martech USA crew on site 4/21/90 submitting a plan for cleanup 4/23/90.
REM	(Removal / Excavation)	06/22/1990		N. K. F. S. inc. sent in cleanup report for spill at site. Contaminated soils stockpiled to be landfarmed throughout summer until all light ends have dissipated. Soils to be returned to excavation site following chemical analysis of soil. 8/10/90 470 (O.M.S.R.R.F.)\$500.00 delegated to Steve Eng site manager ledger code 46000611 original spill# 90-2-11-110-2. (reason why this was done not in file)
ADD	* Site added to database	08/01/1990		Diesel & aviation gasoline contaminants
CLOS	* State Closure of Site	12/01/1994	Olson	This action information provided by Dronenburg.

Contaminated Site Data and Actions For: 93250122451

Generic Name:	Resort	Company:	Iliamna Lake Resort	Elect. District:	HS-40	File No:	CS
Facility Name:	Iliamna Lake Resort	Lead RP:	Iliamna Lake Resort	Just :			
Facility:		Mailing:	P.O. Box 206	Prog :	RP	Landowner:	PRV
Address:		Address:		Facility ID # :			
City/State/Zip:	Iliamna AK 99606	City/State/Zip:	Iliamna AK 99606	Staff:	Krogsgeng		
Telephone:		Telephone:		Ranking Score:			
		Ledger Code:	14954489	Priority:	3	Status:	AC
Latitude:	59.500000						
Longitude:	-155.000000						
Legal:							

Problem: Petroleum range contamination encountered beneath an UST during site assessment following removal of three 7,000 gallon UST's (old RR tank cars). This site dealt with one heating oil tank which had contaminated soils associated with it. The other 2 tanks were gasoline and addressed under LUST equivalent rekey site.

Comments: Last staff assigned were English then Horwath.

Actions:

Code	Description	Date	Action Staff	Status
RAU	(Remedial Actions Underwa	08/12/1993	Horwath	CS remedial action underway.
NOR	Notice of Release Letter	01/20/1994		
SALR	* (Phase I SA Review) (CS/	06/23/1994		Groundwater contaminated with DRO and BTEX constituents.
SALR	* (Phase I SA Review) (CS/	07/23/1994		Requested RP to determine the extent of soil and groundwater contamination.
ADD	* Site added to database	01/10/1997	Krogsgeng	Contaminated soil from heating oil tank. CS portion of site.
UPD	* Site Update (only optio	02/13/1997	Krogsgeng	The tank used for heating oil (CS) has been removed and contaminated soil has been placed in a lined and covered pile. Lab tests still show contaminated soil / groundwater plume down gradient of the original excavation. We are looking at transferring this site to the VCP.

Contaminated Site Data and Actions For: 94250122401

Generic Name:	Electric generation facility	Company:	Iliamna-Newhalen Nond Electric	Elect. District:	HS-40	File No:	
Facility Name:	Iliamna-Newhalen Nondalton Electric	Lead RP:	Iliamna-Newhalen Nondalton Electric	Just :			
Facility:	Roadhouse Bay	Mailing:	c/o Bobby D. Smith, atty	Prog :	RP	Landowner:	PRV
Address:		Address:	255 East Fireweed Lane	Facility ID # :			
City/State/Zip:	Iliamna Lake AK 99606	City/State/Zip:	Anchorage AK 99503	Staff:	None		
Telephone:		Telephone:	907 277-1604	Ranking Score:	1.56		
		Ledger Code:	14997160	Priority:	3	Status:	IN
Latitude:	59.754700						
Longitude:	-154.906006						
Legal:							

Problem: Iliamna-Newhalen Nondalton Electric Corp. (INNEC) had several small leaks that have contaminated soils and they are cleaning up.

Comments: Last staff assigned was Dronenburg.

Actions:

Code	Description	Date	Action Staff	Status
RPLL	* Initiate Dialog with RP	07/13/1995	Dronenburg	Initiate dialogue with responsible party.
RAFP	(Remedial Action Plan Rev	07/13/1995	Dronenburg	Cleanup and remediation plan received and reviewed.
CORR	(Correspondence) (General)	07/21/1995	Dronenburg	Sent ADEC response letter requesting additional information
SALR	* (Phase I SA Review) (CS/	07/21/1995	Dronenburg	Reviewed a phase 1 site assessment.
TOCR	(Treatment, Other) (Treatm	08/01/1995	Dronenburg	Treatment approved.
RAFP	(Remedial Action Plan Rev	08/01/1995	Dronenburg	Reviewed and approved remedial action plan.
ADD	* Site added to database	08/17/1995	Dronenburg	Site added to database.

Contaminated Site Data and Actions For: 94250125001

Generic Name:	Tank Farm	Company:	City of Nondalton	Elect. District:	HS-40	File No:	
Facility Name:	Nondalton tank farm	Lead RP:	City of Nondalton	Just :			
Facility:	ADOT/PP Airport	Mailing:	General Delivery	Prog :	RP	Landowner:	STO
Address:		Address:		Facility ID # :			
City/State/Zip:	Nondalton AK 99640	City/State/Zip:	Nondalton AK 99640	Staff:	Closed		
Telephone:		Telephone:		Ranking Score:			
		Ledger Code:	14998760	Priority:	9	Status:	CL
Latitude:	59.973603						
Longitude:	-154.845825						
Legal:							

Problem: Citizen report of spill. Contaminated soil resulting from operation of tank farm.

Comments: City of Nondalton tank farm located on State of Alaska Airport property is unauthorized to be there. Follow-up indicates no leak or contaminated soil. Last staff assigned was Dronenburg.

Actions:

Code	Description	Date	Action Staff	Status
RPLL	* Initiate Dialog with RP	08/15/1994	Dronenburg	Initiate dialogue with responsible party.
NOV	* Notice of Violation	09/07/1994	Dronenburg	Notice of violation issued. Request for corrective action.
CLOS	* State Closure of Site	09/15/1994	Dronenburg	No further action required.
ADD	* Site added to database	06/06/1995	Dronenburg	Site added to database.

**Interagency Working Agreement
Concurrence Form**

Project Description: Diamna-Nondalton Road Improvements

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 4/18/98

Concurrence Point

Purpose & Need

Alternatives to be Analyzed

Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

Concurrence ¹

Nonconcurrence ²

Nonparticipation by choice ³

Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: _____

Alaska Dept. Env. Conservation
Agency

Christine L. Jones
Signature

20 April 98
Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

INTERAGENCY WORKING AGREEMENT CONCURRENCE FORM

Project Description: **LIAMNA-NONDALTON ROAD IMPROVEMENTS**

State Project # 51950 Federal Project #: STP-0214(3)
 Environmental Document: EA Date Concurrence Due: 9/6/99

Concurrence Point


- | | |
|---|--|
| <input type="checkbox"/> Purpose & Need | <input type="checkbox"/> Alternatives to be analyzed |
| <input checked="" type="checkbox"/> Preferred Alternative | |

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative by his/her signature to this document signifies one of the following:

- | | |
|---|--|
| <input type="checkbox"/> Concurrence ¹ | <input type="checkbox"/> Nonconcurrence ² |
| <input type="checkbox"/> Non-participation by choice ³ | <input checked="" type="checkbox"/> Non-participation by constraint ⁴ |

Comments/Reasons for nonconcurrence:

<u>ADEC</u> Agency	 Signature	<u>10-26-99</u> Date
-----------------------	---	-------------------------

¹ Concurrence means that the information is adequate for the state under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not be construed as nonparticipation by choice.

Please return form to: Jerry O. Ruehle, Environmental Coordinator, Preliminary Design and Environmental Section, Box 196900, Anchorage, Alaska 99519-6900.

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

Habitat and Restoration Division

TONY KNOWLES, GOVERNOR

333 Raspberry Road
Anchorage, AK 99518-1599
PHONE: (907) 267-2285
FAX: (907) 267-2464

RECEIVED

NOV 07 '97

MEMORANDUM

TO: Helen Lons
Environmental Analyst
Preliminary Design and Environmental

FROM: Stewart Seaberg *SJS*
Habitat Biologist
Region II

DATE: November 7, 1997

SUBJECT: Iliamna to Nondalton Road - Scoping Comments
Project Number 51951

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr.	<i>JDN</i>	
Locations		
Env. Team Leader	<i>HL</i>	
Staff		
Project File		<i>N</i>
Central File		<i>N</i>

The Alaska Department of Fish and Game (ADF&G) has reviewed your request for re-scoping comments on the proposed road from Iliamna to Nondalton. The original proposal was expected to qualify as a Categorical Exclusion (CE) in accordance with the National Environmental Policy Act (NEPA). Since then, the Federal Highway Administration has determined that an Environmental Assessment will be required for this proposal.

This proposal consists of upgrading the existing road from the Iliamna Airport to the Newhalen River, constructing a 653-foot long bridge across the Newhalen River and reconstructing a pioneer road from the Newhalen River to Nondalton. The proposed bridge over the Newhalen River is expected to require piers to be placed in the flowing water of the Newhalen River. This proposal is similar to the original proposal that the ADF&G provided comments on November 6, 1995. Since those comments address the same issues and questions you have identified in your re-scoping request, they are attached for your consideration. The ADF&G is providing you with the following additional comments:

1. The placement of bridge piers in the Newhalen River will require a Fish Habitat Permit from the ADF&G, if bridge abutments or piers are to be placed below the ordinary high water (OHW) level of the Newhalen River. The ADF&G recommends that the bridge abutments, and armor rock on the bridge abutments, be placed completely above OHW.

Helen Lons

-2-

November 7, 1997

2. The placement of bridge piers may require complete isolation of the work area from the flowing waters of the Newhalen River if drilling and/or concrete placement is proposed in the flowing waters of the Newhalen River. Pile driving may not require complete isolation from the flowing waters of the Newhalen River provided water quality in the Newhalen River is not impacted by pile driving activities.
3. The ADF&G recommends that all work in the flowing waters of the streams that cross the proposed road be minimized. Inwater work conducted in specified anadromous fish streams (the Newhalen River, Bear Creek and Alexcy Creek) should be conducted only from May 15 through July 15.
4. The placement of new culverts, culvert extensions, or the replacement of existing culverts, in fish bearing streams, will require a Fish Habitat Permit from the ADF&G.

In addition to the direct impacts of road construction, the secondary impacts of this proposal should also be considered. These secondary impacts include sedimentation of the stream resulting from erosion along the road surface and road cuts, increased hunting and fishing pressure on the lands and streams adjacent to the new road, and increase vehicular collisions with wildlife. The secondary from road construction may be much more significant than the direct impacts from road construction.

We appreciate the opportunity to comment on this proposal. Please call me at 267-2444 if you have any questions.

Attachment

cc: T. Rumpfelt, DEC
R. Thompson, DNR
W. Wrede, L&PB
R. Minard, ADF&G
R. Sellers, ADF&G
J. Regnart, ADF&G
L. Van Daele, ADF&G

**Interagency Working Agreement
Concurrence Form**

Project Description: Iliamna-Nondalton Road Improvements

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 11/26/97

Concurrence Point

Purpose & Need

Alternatives to be Analyzed

Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

Concurrence ¹

Nonconcurrence ²

Nonparticipation by choice ³

Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: _____

AK Dept of Fish & Game
Agency

Stewart Sealing
Signature

11/26/97
Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

STATE OF ALASKA

TONY KNOWLES, GOVERNOR

Post-it® Fax Note	7671	Date	4/17/98	# of pages	3
To	Helen Lons	From	Stewart Seaberg		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #		Fax #			

WILD GAME
Habitat Division

333 Raspberry Road
Anchorage, AK 99518-1599
PHONE: (907) 267-2285
FAX: (907) 267-2464

APR 20 '98

MEMORANDUM

TO: Helen Lons
Environmental Analyst
Preliminary Design and Environmental

FROM: Stewart Seaberg *SS*
Habitat Biologist
Region II

DATE: April 17, 1998

SUBJECT: Iliamna to Nondalton Road - Request for Concurrence with Alternatives
Project No. 51951

Prelim. Design		
Environmental Section		
PD&E Engr.		
Project Mgr.	<i>D. Calvert</i>	
Locations		
Env. Team Leader		
Staff		
Project File		
Central File		

The Alaska Department of Fish and Game (ADF&G) has reviewed your request for our concurrence with the selected alternatives that will be analyzed for the proposed road from Iliamna to Nondalton. Of the six Build Alternatives that have been identified only two of these alternatives, the road improvements and bridge alternative, and the bridge without road improvements alternative, have been determined to meet the purpose and the need for this project. The ADF&G concurs with the alternatives that have been chosen to be analyzed for the Environmental Assessment. The concurrence form is attached.

The following comments are being provided to assist you in developing the environmental assessment for this proposal:

- The diagrams that were attached to the alternative analysis indicate that the abutment on the east bank of the Newhalen River will extend below the ordinary high water level of the Newhalen River. The ADF&G recommends that both bridge abutments, and armor rock for the abutments, be located as far back from the banks of the Newhalen River as possible. A vegetated buffer should remain between the bridge abutments and the river on both banks.
- The bridge approach along the east bank of the Newhalen River should be cut deep enough to direct stormwater in an easterly direction, away from the

Helen Lons

-2-

April 17, 1998

Newhalen River. This will minimize chronic water quality problems that may result from long slopes and cuts directing erosion toward the Newhalen River from the bridge approach.

3. The bridge over the Newhalen River should be designed and constructed to accommodate all maintenance equipment that will be needed to maintain the entire road from Nondalton to Iliamna. This will negate future need for open water or above ice equipment crossings of the Newhalen River.
4. Maintain the road right-of-way to allow public access along the east and west banks of the Newhalen River.

We appreciate the opportunity to comment on this proposal. Please call me at 267-2444 if you have any questions.

Attachment

cc: T. Rumpfelt, DEC
G. Prokosh, DNR
M. McCrea, DGC
W. Wrede, L&PB
D. Vos, NMFS
G. Wheeler, FWS
K. Kuna, COE
H. Dean, EPA

**Interagency Working Agreement
Concurrence Form**

Project Description: Diamna-Nondalton Road Improvements

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 4/18/98

Concurrence Point

Purpose & Need

Alternatives to be Analyzed

Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

Concurrence ¹

Nonconcurrence ²

Nonparticipation by choice ³

Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: _____

AK Dept of Fish + Game
Agency

Stewart J. Sealberg
Signature

4/17/98
Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.
² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.
³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.
⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

INTERAGENCY WORKING AGREEMENT CONCURRENCE FORM

Project Description: **ILIAMNA-NONDALTON ROAD IMPROVEMENTS**

State Project #: 51951 Federal Project #: STP-0214(3)

Environmental Document: EA Date Concurrence Due: 9/6/99

Concurrence Point

- Purpose & Need Alternatives to be analyzed
- Preferred Alternative
-

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative by his/her signature to this document signifies one of the following:

- Concurrence¹ Nonconcurrence²
- Non-participation by choice³ Non-participation by constraint⁴

Comments/Reasons for nonconcurrence:

Alaska Department of Fish and Game
Agency

C. Wayne Polyzal
Signature

10/8/99
Date

¹ Concurrence means that the information is adequate for the state under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not be construed as nonparticipation by choice.

Please return form to: Jerry O. Ruehle, Environmental Coordinator, Preliminary Design and Environmental Section, Box 196900, Anchorage, Alaska 99519-6900.

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

Habitat and Restoration Division

TONY KNOWLES, GOVERNOR

333 Raspberry Road
Anchorage, AK 99518-1599
PHONE: (907) 267-2464
FAX: (907) 267-2464

RECEIVED

OCT 11 '99

MEMORANDUM

TO: Susan N. Wick, Environmental Team Leader
Preliminary Design and Environmental
Department of Transportation and Public Facilities

FROM: *C. Wayne Dolezal*
C. Wayne Dolezal
Habitat Biologist
Region II

DATE: October 8, 1999

SUBJECT: Preliminary Draft Environmental Assessment—Preferred Alternative
Iliamna-Nondalton Road; Project N^o STP-0214(3)/51951

Prelim. Design & Environmental Section	COM	ACTION
PD&E Engr.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project Mgr.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Env. Coord.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Env. Team Leader	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Staff	<input type="checkbox"/>	<input type="checkbox"/>
Hydrologist	<input type="checkbox"/>	<input type="checkbox"/>
Project File	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Central File	<input checked="" type="checkbox"/>	<input type="checkbox"/>

51951

The Alaska Department of Fish and Game (ADF&G) has reviewed the preliminary draft environmental assessment (PDEA) for the project to upgrade a portion of the existing road on the east side of the Newhalen River and construction of a road along the alignment of the existing trail on the west side of the Newhalen River between Iliamna and Nondalton, Alaska. Included in the project plan is construction of a pile-supported bridge across the Newhalen River. The bridge site is found in the SE $\frac{1}{4}$ SE $\frac{1}{4}$ Section 1, Township 3 South, Range 33 West, Seward Meridian. The preferred alternative identified in the PDEA includes (1) resurfacing, restoring, and rehabilitating the existing 14.4-mile long road between the Iliamna airport and the Newhalen River, (2) constructing a 653-foot long, one lane, six span steel girder bridge over the Newhalen River, and (3) building a 22-foot wide, two lane, gravel surfaced road between the bridge and Nondalton to replace the existing 1.4-mile long trail. The bridge superstructure would consist of four steel stringers supporting precast concrete deck panels. Five piers spaced about 118 feet apart would support the steel girders with each pier consisting of three 30-inch diameter steel pipe piles. Four of the piers would be located below the ordinary high water level of the river. Due to elevation differences between the east and west banks of the river, about 33 feet of the east bank would be excavated to lower the east end of the bridge thereby reducing the slope of the bridge's running surface. The bridge will slope at about 2.3 percent to the west.

With a few exceptions the PDEA adequately addresses fish and wildlife related concerns. The following comments are divided into general, editorial, and NEPA/404 merger comments. The general comments are aimed at improving the document by clarifying some statements or raising questions that should be answered before finalizing the draft environmental assessment.

General Comments

Page 7, first paragraph (continued from page 6): Mention should be made that the road embankments at Lovers Creek and South Fork Alexy Creek are badly eroded and are depositing large volumes of sediment in the streams. In addition, the culvert outlet at the South Fork Alexy Creek is perched approximately 18 inches and is undercut about 5 feet. Although not as pronounced, erosion of the road embankment is also occurring at Bear Creek.

Page 7, second paragraph: This paragraph deals with the existing road north of Alexy Creek and south of the Fish Camp turnoff. The fourth sentence speaks to culverts and fish passage. Within this road segment there are no fish streams. Any culverts that have been installed merely provide cross drainage for surface runoff.

Page 7, last paragraph (continues on page 8): This paragraph deals with the existing road from Nondalton to the materials site located west of the village. The road crosses two streams using culverts at each crossing. The outlets of the culverts are perched and are blocking resident fish movements. The culverts also appear to be undersized for the seasonally high flows in the systems and they appear to have been installed at too steep a slope.

Page 10, third paragraph: The road embankment at the South Fork Alexy Creek is also in dire need of stabilization.

Page 19, second paragraph, last sentence: How could the completed road and bridge help control bootlegging? Will some sort of checkpoint be established to inspect road users and their vehicles?

Page 21, Pedestrians and Bicyclists: Under the preferred alternative discussion, it is likely that bank trampling by foot traffic and vehicles at the bridge site will likely increase, particularly on the west side of the river.

Page 23, Water Quality, paragraph 4: What measures will be taken to prevent road runoff water entering the bridge from the east side approach? How will bridge runoff be treated and controlled on the west side of the Newhalen River to ensure that erosion of the river banks and riparian zone is prevented and sedimentation of the river will not occur?

In addition, experience throughout the state shows that people use road rights-of-way at bridges to create access points to rivers and streams. Continued foot and vehicle traffic at such sites causes riverbank and vegetative damage that leads to soil erosion and water quality problems from the resulting sedimentation. There is no reason to believe that the same thing will not occur at the Newhalen River bridge. For this reason we recommend that project designs at the bridge include some kind of developed access feature on the west side of the bridge that will both allow people to get to the river and also prevent long term erosion and water quality problems. We will work closely with you during the design phase of the project to assist in development of an environmentally friendly approach to address the situation.

Page 28, Essential Fish Habitat Assessment, sixth sentence: Since 1973 the work timing window for the Bristol Bay area has been refined. Inwater work is usually permitted only during the period mid-May through mid-July. To prevent disturbance of salmon spawning activities and to protect incubating eggs and developing alevin and fry, the no inwater work period extends from mid-July through the fall and winter months and into the spring.

Page 33, Materials Sites: If ADOT&PF does not specify where some of the road materials will come from, what would be done with the materials from the east side bridge approach if not used for road improvements/construction?

Editorial Comments

Page 3, first line: Delete the word Kokhanok. The electricity produced at the Tazimina Hydroelectric facility is not transmitted to the south side of Lake Iliamna.

Page 3, last paragraph, third sentence: The reference should be to figure 10 not figure 8.

Page 4, first paragraph: The reference should be to figures 11 and 12 not figure 9.

Page 5, first paragraph: For clarification it should be specified that the boat "landing site" is located on the east side of the Newhalen River about 600 feet downstream from the mouth of Alexy Creek.

Page 7, first full paragraph: The reference to figures 10 and 11 should be changed to figures 11 and 12.

Page 18, third paragraph, second sentence: The proposed mine site is located between the headwaters of Upper Talarik Creek and the Kaktuli River.

Page 27, Fish and Wildlife, second sentence: Bears concentrate miles downstream near low stream banks during the summer and fall . . . bridge site.

NEPA/404 Merger Comments

This project is being reviewed concurrently under the National Environmental Policy Act (NEPA) and section 404 of the Clean Water Act. In accordance with the Interagency Working Agreement on these projects, you are requesting the ADF&G to respond to the selection of the preferred alternative. The completed form is attached. Of the options available on the form, the ADF&G has selected Non-participation by Choice because it appears that any regulatory or resource issues can be resolved during the design phase of development. We may also comment on the draft environmental assessment when it is approved for public circulation.

We appreciate the opportunity to comment and look forward to working with you during the design phase of the project. Should you have any questions please do not hesitate to contact me at 267-2333.

Attachment

cc: S. Morstad, ADF&G
K. Weiland, ADF&G
D. Dunaway, ADF&G
R. Sellers, ADF&G
G. Wheeler, FWS/WAES
M. Eagleton, NMFS
R. Stefanich, DOT&PF
W. Wrede, L&PB
C. Sanner, DOT&PF

MEMORANDUM

STATE OF ALASKA

Department of Natural Resources
Division of Mining and Water Management
Alaska Hydrologic Survey

TO: Susan N. Wick
Environmental Team Leader

DATE: 11/06/97

FILE NO:

THRU:

TELEPHONE NO: 269-8645

FROM: Gary Prokosch *GP*
Chief, Water Resources

SUBJECT: Iliamna Road

Thanks for the opportunity to comment on the ADOT&PF Iliamna Road Improvement Project No. STP-0214(3)/51951. The two specific questions detailed in your cover memo deal directly with The Division of Land and the Division of Parks and Outdoor Recreation. These issues are best left to those Divisions charged with those responsibilities. A copy of your scoping letter and attachments were sent to these two Divisions. The Division of Land had no comments and The Division of Parks and Outdoor Recreation commented that there are no existing or proposed parks in the vicinity of the project.

With regard to water two potential areas of concern are apparent. First, the lack of a bridge across the Newhalen River currently has the potential for adverse impacts downstream as heavy equipment is forced to ford the river. Construction of a bridge, using appropriate engineering practices, is likely to reduce the sedimentation and erosion problems at the river crossing. Second, the road corridor is likely traversing some wetland areas. In order to avoid some of the more impassable muddy wetland areas local residents find alternative routes, increasing the "footprint" of the road. Construction of the road could reduce the impacts to wetlands outside of the immediate road corridor. Care should be taken in road design not to allow for dewatering of the wetlands by the road construction process.

In the area, only the Tazimina and Newhalen had any long term stream gaging records. The data for the Newhalen should prove useful, while the Tazimina data may prove useful only for purposes of calibration. Some miscellaneous measurements may be available for other smaller effected streams, but that is likely of very limited value for design and engineering

RECEIVED

NOV 07 '97

ACTION									
COPY									
Prelim. Design & Environmental									
A-204									
gr.									
agr.									
ns									
Env. Team Leader									
Staff									
Project File									
Central File									

Memo to Susan Wick:

11/05/97

purposes due to the "snap shot" nature of such data. For streams other than the Newhalen, design flows will likely need

to be estimated by indirect methods, calibrated to long term data in the vicinity.

Given that the road/bridge design and construction are completed using appropriate engineering practices, the road as now proposed is likely to not only protect, but improve conditions with regard to water. We have no objections to the proposed project.

cc: Dave Stephens, DOPOR
Rick Thompson, DOL

Project Description: Hiama-Nondalton Road Improvements

NOV 25 '97

State Project #: 01951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 11/26/97

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr.		
Locations		
Env. Team Leader/Staff		
Project File		
Central File		

Concurrence Point

Purpose & Need

Alternatives to be Analyzed

Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

Concurrence ¹

Nonconcurrence ²

Nonparticipation by choice ³

Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence:

_____ If during the next phase of this project you find that hydrologic data collection and analysis are needed for design and construction, please contact Mark Inghram at 269-8638. Data collection and analysis can be conducted as per the Merger Agreement. _____

DWR/William V. Rivas
Agency

Day A. Rakesh
Signature

11/25/97
Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

Interagency Working Agreement Concurrence Form

Project Description: Liamna-Nondalton Road Improvements

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 4/18/98

Concurrence Point

Purpose & Need

Alternatives to be Analyzed

Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

Concurrence ¹

Nonconcurrence ²

Nonparticipation by choice ³

Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: _____

DWR / Mining & Water Mgmt.
Agency

[Signature]
Signature

4/13/98
Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

INTERAGENCY WORKING AGREEMENT CONCURRENCE FORM

RECEIVED

SEP 03 '99

Project Description: **ILIAMNA-NONDALTON ROAD IMPROVEMENTS**

State Project #: 51951 Federal Project #: STP-0214(3)

Environmental Document: EA Date Concurrence Due: 9/6/99

Prelim. Design & Environmental Section	COPT	ACTION
PD&E Engr.		
Project Mgr. <i>Dickerson</i>		
Env. Coord. <i>JRT</i>		
Env. Team Leader <i>[Signature]</i>		
Staff		
Hydrologist		
Project File		2
Central File		1

Concurrence Point

- Purpose & Need Alternatives to be analyzed
- Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative by his/her signature to this document signifies one of the following:

- Concurrence¹ Nonconcurrence²
- Non-participation by choice³ Non-participation by constraint⁴

Comments/Reasons for nonconcurrence:

The Newhalen River is navigable and its bed state owned. A right-of-way from DNR may be required for the bridge. During construction, the contractor may need a temporary water use permit from DNR.

Dept. of Nat. Resources Greg Curney 9/3/99
 Agency Signature Date

¹ Concurrence means that the information is adequate for the state under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not be construed as nonparticipation by choice.

Please return form to: Jerry O. Ruehle, Environmental Coordinator, Preliminary Design and Environmental Section, Box 196900, Anchorage, Alaska 99519-6900.

STATE OF ALASKA

TONY KNOWLES, GOVERNOR

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

SOUTHCENTRAL REGIONAL OFFICE
3601 "C" STREET, SUITE 370
ANCHORAGE, ALASKA 99503-5930
PH: (907) 269-7470/FAX: (907) 561-6134
October 10, 1997

CENTRAL OFFICE
P.O. BOX 110030
JUNEAU, ALASKA 99811-0030
PH: (907) 465-3562/FAX: (907) 465-3075

PIPELINE COORDINATOR'S OFFICE
411 WEST 4TH AVENUE, SUITE 2C
ANCHORAGE, ALASKA 99501-2343
PH: (907) 271-4317/FAX: (907) 272-0690

Ms. Susan Wick
Environmental Team Leader
Dept. of Transportation and Public Facilities
P.O. Box 196900
Anchorage, AK 99519-6900

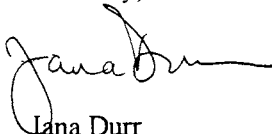
RE: Agency Re-Scoping
Upgrade and Improve Road Access between Iliamna and Nondalton
DOT Project No. STP-0214(3)/51951

Dear Susan:

Thank you for the notification of your proposed project, noted above. The Division of Governmental Coordination does not formally review or coordinate State agency comments regarding NEPA documents prepared by the Alaska Department of Transportation and Public Facilities.

However, we will keep NEPA-related information we receive on file until your project has reached the permit application stage. We will initiate the Alaska Coastal Management Program consistency review when a complete application packet is received. Please feel free to call me at 269-7472 if you have questions.

Sincerely,



Jana Durr
Project Review Assistant

RECEIVED

OCT 12 '97

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr.		J. Dickenson
Locations		
Env. Team		ESD
Staff	HL	
Project File		

S:\DGC\TEMPLATE\ANCH-DGC\DOTSCOPE.WPT

2436927

DEC-11-97 THU 11:26

SOA/DOT&PF PD&E

FAX NO. 2436927

P. 02/02

Interagency Working Agreement Concurrence Form

Project Description: Iliamna-Nondalton Road Improvements

State Project #: 51951

Federal Project #: STP-0214(3)

Environmental Document: EA

Date Concurrence Due: 11/26/97

Concurrence Point

Purpose & Need

Alternatives to be Analyzed

Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative, by his/her signature to this document signifies one of the following:

Concurrence¹

Nonconcurrence²

Nonparticipation by choice³

Nonparticipation by constraint⁴

Comments/Reasons for nonconcurrence: _____

LAKE + PENINSULA BOROUGH
Agency

Sheila Bergery
Signature

12/11/97
Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation by choice.

APR-13-98 MON 08:34

SOA/DOT&PF PD&E

2436927

FAX NO. 2436927

P. 02/02

Interagency Working Agreement Concurrence Form

Project Description: Hianna-Nondalton Road Improvements

APR 15 98

State Project #: <u>51951</u>	Federal Project #: <u>STP-0214(3)</u>	Prelim. Design & Environmental Section	COPY	ACTION
Environmental Document: <u>EA</u>	Date Concurrence Due: <u>4/18/98</u>	PD&E Eng.		
		Project Mgt. <u>ICORSKU</u>		
		Locations		
		Env. Team Leader		
		Staff		
		Project File		
		Central File		

Concurrence Point

- Purpose & Need
- Alternatives to be Analyzed
- Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative by his/her signature to this document signifies one of the following:

- Concurrence ¹
- Nonconcurrence ²
- Nonparticipation by choice ³
- Nonparticipation by constraint ⁴

Comments/Reasons for nonconcurrence: _____

LAKE AND PENINSULA BOROUGH
Agency

Walt Wade
Signature

4/14/98
Date

¹ Concurrence means that the information is adequate for the stage under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development, or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not to be construed as nonparticipation.

INTERAGENCY WORKING AGREEMENT CONCURRENCE FORM

Project Description: **ILIAMNA-NONDALTON ROAD IMPROVEMENTS**

State Project #: 51951 Federal Project #: STP-0214(3)

Environmental Document: EA Date Concurrence Due: 9/6/99

Concurrence Point

- Purpose & Need Alternatives to be analyzed
- Preferred Alternative

Concurrence Response

Having reviewed the information presented in reference to the above concurrence point(s), the agency representative by his/her signature to this document signifies one of the following:

- Concurrence¹ Nonconcurrence²
- Non-participation by choice³ Non-participation by constraint⁴

Comments/Reasons for nonconcurrence:

LAKE AND PENINSULA BOROUGH [Signature] 8/31/99
 Agency Signature Date

¹ Concurrence means that the information is adequate for the state under development and the project may proceed to the next stage without modification.

² Nonconcurrence means that the information is not adequate to address the stage under development or the potential adverse impacts of the project are unacceptable, or the project should be modified to reduce impacts.

³ Nonparticipation by choice means that, based on the information provided, it appears that any regulatory or resource issues can be resolved at the next stage or phase of development.

⁴ Nonparticipation by constraint means that the agency does not have the ability to participate in the process at this point. This is not be construed as nonparticipation by choice.

Please return form to: *Jerry O. Ruehle, Environmental Coordinator, Preliminary Design and Environmental Section, Box 196900, Anchorage, Alaska 99519-6900.*



Lake and Peninsula Borough

P.O. Box 495
King Salmon, Alaska 99613

Telephone: (907) 246-3421
Fax: (907) 246-6602



August 31, 1999

Mr. Jerry O. Ruehle
Environmental Coordinator
Alaska Department of Transportation
And Public Facilities
4111 Aviation Ave.
P.O. Box 196900
Anchorage, AK. 99519-6900

SEP 01 '99

SUBJ: Preliminary Draft Environmental Assessment
Iliamna-Nondalton Road Improvements
Project NO. STP - 0214(3) / 51951

Prelim. Design & Environmental Section	COMP	ACTION
PO&E Engr.		
Project Mgr. <i>Dickerson</i>		
Env. Coord. <i>IR</i>		
Env. Team <i>[blacked out]</i>		
Staff <i>CS</i>		
Hydrologist		
Project File		<i>2</i>
Central File		<i>2</i>

Dear Mr. Ruehle:

The Lake and Peninsula Borough has completed its review of the Environmental Assessment prepared by your office for the Iliamna-Nondalton Road Improvement Project. The Borough concurs with the Department's conclusion that Build Alternative Number One is the Preferred Alternative. This Alternative is the one that most satisfactorily addresses the "needs" for this project that have been identified. It also appears to be the best alternative overall in terms of the anticipated social, economic, and environmental impacts. Attached is a signed copy of the Interagency Working Agreement Concurrence Form.

The Preliminary Draft Environmental Assessment was reviewed by both the Borough Planning Commission and Assembly. Both bodies supported the Preferred Alternative but expressed some concern about possible impacts to fish habitat associated with the proposed bridge design. The Commissioners and Assembly members had the impression that there would be just one or two pilings or piers in the Newhalen River and were surprised to see that four are proposed. The general sense of the members was that it would be preferable to have as few piers as possible.

The Commission suggested that the Department take another look at the maximum length of bridge construction materials that could be reasonably transported to Iliamna. Several

members thought that larger pieces could be transported across the Williamsport-Pile Bay Road than was stated in the Environmental Assessment. Others noted that the Kvichak River barge route is open again and should be reconsidered. Several Assembly members suggested that we might want to consider transferring some of the funding earmarked for road improvements to the bridge if it would enable us to build a bridge with fewer piers in the water.

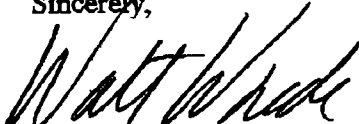
The Borough understands that the Department has spent a significant amount of time assessing a number of bridge alternatives and that this work is described in a report entitled "Newhalen Bridge Type Selection Report." We hope to be able to read this report in order to better understand the assumptions and criteria which were used to make the bridge design selection. We understand that it may very well be that this design is the most environmentally benign given the funding and logistical parameters we are faced with.

New information has become available to us since the Borough Assembly meeting. The Department of Fish and Game has informed us that it is not very concerned about the long term impacts to fish habitat associated with the piers provided that construction is carried out properly. The Department also noted that ADOT/PF staff have been consulting with the ADF&G Habitat Division regarding ways to minimize erosion and runoff, particularly at the eastern end of the bridge. The fact that DOT/PF is working closely with ADF&G will provide assurances to the Assembly that habitat is being fully considered with respect to the proposed bridge. Further, it now is clearer to us that this design may have significant advantages over the other designs because it can be constructed quickly and does not require falsework, temporary pilings or bridges, extensive abutments, or other in-water structures that require large displacements and significant disruption of the river bottom.

Please be assured that this project remains the top transportation priority for the Lake and Peninsula Borough and we wish to see it completed as soon as possible. It is not our intent to second guess the Department's planners and engineers. We simply want to work with the Department to make sure that every effort is made to protect fish habitat. This is important to us because commercial, sport, and subsistence fishing constitute the foundation of the regional economy.

Thanks for the opportunity to comment. We look forward to participating in the Coastal Consistency Review and to receiving your application for a Borough Development Permit. Please do not hesitate to contact us if you have any questions or need additional information.

Sincerely,



Walt Wrede, Borough Manager

**LAKE AND PENINSULA BOROUGH
RESOLUTION 98-18**

A RESOLUTION ESTABLISHING THE BOROUGH'S TRANSPORTATION PRIORITIES for 1998.

WHEREAS, the Lake and Peninsula Borough Assembly is committed to providing for and promoting sustainable and culturally sensitive economic development and job creation, and

WHEREAS, enhancing and expanding the Borough's transportation infrastructure is a key component of the Borough's plan to promote economic development and diversification, and

WHEREAS, the Alaska Department of Transportation and Public Facilities (DOT/PF) is developing a new Statewide Transportation Improvement Program (STIP) for the period 2000 to 2002, and

WHEREAS, transportation project nominations and new information on existing projects are due October 12, 1998, and

WHEREAS, the public comment period provides the Borough with an opportunity to nominate new Borough projects and to provide additional information that may improve the ranking of specific projects already included in the "Needs List", and

WHEREAS, the Assembly wishes to formally establish its 1998 transportation priorities, demonstrate its support for these projects to ADOT/PF, and take any other necessary steps to promote and facilitate the completion of these projects.

NOW THEREFORE BE IT RESOLVED, that the Assembly hereby establishes the Borough's 1998 transportation priorities as follows:

CATEGORY 'A' PRIORITIES

Category A contains the Borough's highest priority transportation projects. These are large regional projects. The completion of these projects will result in social and or economic benefits for the State, the Borough and/or a sub-region of the Borough. These projects are listed in order of priority.

1. Iliamna-Nondalton Road
2. Chignik Small Boat Harbor

3. Pile Bay - Williamsport Road
4. Pilot Point Airport Relocation and Runway Extension
5. Chignik Public Dock
6. Chignik Inter-Village Road
7. Egegik Airport Extension
8. Pilot Point / Dago Creek Dock Improvements

CATEGORY 'B' PRIORITIES

Category B contains Borough transportation priorities for individual communities. The benefits associated with these projects are primarily limited to single communities. These projects are proposed and identified by the local community governing body. They have been reviewed and endorsed by the Borough. As a matter of policy, the Borough does not attempt to prioritize these projects. They are listed alphabetically by community.

City of Chignik

Airport access road reconstruction
 Airport lighting
 Hydro plant access road
 Water tank access road

Chignik Lagoon

Short term airport repairs and improvements
 New airport construction and relocation (preferably at Metrofania Valley)
 Upgrade incinerator access road
 Packer Creek bridge erosion control

Chignik Lake

Chignik River wier access road construction (3 miles)

Egegik

Landfill Access Road

Iguigig

Landfill Access Road

Iliamna

Airport master plan
 Airport paving and fencing

Seaplane base development
ATU and Bicycle path / Iliamna-Newhalen

Ivanof Bay

Airport master plan
New airport construction / relocation
Access road to Stepovak Bay
Sludge disposal site access road
Dock / landing area
Landfill Access Road

Kokhanok

Airport runway extension and lighting
Small boat harbor / dock / ramp

Levelock

Relocate and construct new airport
Public dock
New residential area access road

Newhalen

Local road improvements / upgrades

Nondalton

Landfill / incinerator access road

Pedro Bay

Landfill access road
Rehabilitate community roads
New bridge / Pedro Creek
East Bay Road upgrade/ reconstruction (2.3 miles to boat yard point)
Barney's Bay road upgrade / reconstruction (2.2 miles / Pedro Creek to Barney Bay
Subdivision)

Perryville

Airport improvements and lighting
Public dock / harbor
Local road improvements and upgrades

Pilot Point

Dago Creek Access Road Improvements
Port Alsworth

Airport access road
New public airport construction

Port Heiden

Airport upgrades
Rehabilitate community roads

Ugashik

Landfill Access Road
Public dock feasibility / construction

PASSED AND APPROVED by a duly constituted quorum of the Lake and Peninsula
Borough Assembly this 20th day of October, 1998.

IN WITNESS THERETO:


Glen Alsworth, Sr., Mayor

ATTEST:


Maria Shawback, Borough Clerk





BRISTOL BAY NATIVE CORPORATION

800 CORDOVA / P.O. BOX 100220 / ANCHORAGE, ALASKA 99510 / (907) 278-3602
TELECOPY (907) 276-3924

RECEIVED

OCT 20 '97

October 16, 1997

Ms. Susan N. Wick, Environmental Team Leader
Preliminary Design & Environmental
4111 Aviation Avenue
P.O. Box 196900
Anchorage, AK 99519-6900

RE: Iliamna Road Improvements Project No. STP-0214(3)/51951

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		/
Project Mgr.	John Dickenson	
Locations		
Env. Team Leader	Steph	/
Staff	HL	/
Project File		/
Central File		/

Dear Ms. Wick:

Thank you for the opportunity to write in support of the proposal to upgrade and improve the road access between the Village of Iliamna and the City of Nondalton. The projects you identified; resurface, restore, and rehabilitate the existing approximately 14.4 mile road from Iliamna to the Newhalen River; construct a one lane steel girder bridge across the Newhalen River; construct the approximately 1.7 mile pioneer road/ATV trail (from the River to the end of the approximately 1.4 mile improved road leading to Nondalton) to meet current road way standards, are warranted and would contribute to the health and economic viability for the communities surrounding Lake Iliamna.

The communities of Iliamna, Newhalen, and Nondalton, are doing an excellent job of planning for their future. Promoting this area as the only road access to Lake Clark National Park, from the trunk Airport at Iliamna, would provide the infrastructure to support needed economic development. The communities have worked closely with State Agencies and the Lake and Peninsula Borough to identify projects that will enhance and improve their quality of life and promote economic development. BBNC sees this project as a step in that process. Please consider BBNC's endorsement of the proposed Iliamna Road Improvements Project.

Sincerely,

Tom Hawkins,
SR VP and COO

cc: Village of Iliamna
City of Nondalton
City of Newhalen
Lake and Peninsula Borough

WRITTEN PUBLIC COMMENTS

Your input is an important element in the continued design of this project. To ensure that your views are considered, we have provided this sheet for your convenience. Comments should be returned to ADOT&PF by November 7, 1997.

ILIAMNA - NONDALTON ROAD IMPROVEMENTS

Project No. 51951

PUBLIC SCOPING MEETINGS:

- Monday, October 27, 1997 in Iliamna
- Tuesday, October 28, 1997 in Nondalton
- Tuesday, November 4, 1997 in Anchorage

(Please Print)

NAME: George Alexie
MAILING ADDRESS: Box 108
CITY, STATE, ZIP: Nondalton, A.K. 99640

COMMENTS

I have lived in Nondalton all my life and public safety is my concern. The river at the mouth never freezes and going across the lake to the other side is dangerous several drownings have occurred and several near drownings have also occurred. getting freight from northern air cargo in Iliamna could be easier to get if the road and bridge were in. In Nondalton the wind comes from the East and West. The airport is north/south. air travel to

Note: To mail, fold along solid lines on the back of this sheet and tape or staple, so that the address is shown.

Iliamna is risky ^[esc] A-220 especially for school
related events if the road was in the students
can go down by bus.

WRITTEN PUBLIC COMMENTS

Your input is an important element in the continued design of this project. To ensure that your views are considered, we have provided this sheet for your convenience. Comments should be returned to ADOT&PF by November 7, 1997.

ILIAMNA - NONDALTON ROAD IMPROVEMENTS

Project No. 51951

PUBLIC SCOPING MEETINGS:

- Monday, October 27, 1997 in Iliamna
- Tuesday, October 28, 1997 in Nondalton
- Tuesday, November 4, 1997 in Anchorage

(Please Print)

NAME:

Elizabeth Balluta

MAILING ADDRESS:

P.O. Box 108

CITY, STATE, ZIP:

Nondalton, AK. 99640

COMMENTS

I am for the bridge, I don't think it will effect the environment as wild game or even the fish. The ones that it should bother is us folks of the three villages, berries wise. I think we'll have lots of traffic for the commercial airlines, which will effect the smaller airlines, but... for emergencies for health reasons will be in luck, for the larger airport in Iliamna.

People here in Nondalton need to have more small business, in anything to make \$.

There will be changes anyway, why not start w/ the bridge.

Note: To mail, fold along solid lines on the back of this sheet and tape or staple, so that the address is shown.

WRITTEN PUBLIC COMMENTS

Your input is an important element in the continued design of this project. To ensure that your views are considered, we have provided this sheet for your convenience. Comments should be returned to ADOT&PF by November 7, 1997.

ILIAMNA - NONDALTON ROAD IMPROVEMENTS

Project No. 51951

PUBLIC SCOPING MEETINGS:

- Monday, October 27, 1997 in Iliamna
- Tuesday, October 28, 1997 in Nondalton
- Tuesday, November 4, 1997 in Anchorage

(Please Print)

NAME: Claudine Hobson Greene
MAILING ADDRESS: P.O. Box 56
CITY, STATE, ZIP: Nondalton, AK 99640

COMMENTS

I would like to see the bridge road go through. I think it been being put off long enough. I no for a fact that it will be easier on patient that need to be transferred to Iliamna to catch a medivac plane, cause our field (run way) is not long enough a lights usually don't work. also cheaper to get freight into nondalton.

Note: To mail, fold along solid lines on the back of this sheet and tape or staple, so that the address is shown.

WRITTEN PUBLIC COMMENTS

Your input is an important element in the continued design of this project. To ensure that your views are considered, we have provided this sheet for your convenience. Comments should be returned to ADOT&PF by November 7, 1997.

ILIAMNA - NONDALTON ROAD IMPROVEMENTS

Project No. 51951

PUBLIC SCOPING MEETINGS:

- Monday, October 27, 1997 in Iliamna
- Tuesday, October 28, 1997 in Nondalton
- Tuesday, November 4, 1997 in Anchorage

(Please Print)

NAME:

Harry Karshekoff

MAILING ADDRESS:

NONDALTON AK

CITY, STATE, ZIP:

99640

COMMENTS

I want the road + bridge ~~built~~ build or done because it will make it safer, cheaper and it will save time and money for us to get any thing from Ilimna, no weather to hold projects up.

The students will have more things to do because it will be so much cheaper than flying to Ilimna + Newhalen for games and other stuff

Note: To mail, fold along solid lines on the back of this sheet and tape or staple, so that the address is shown.

WRITTEN PUBLIC COMMENTS

Your input is an important element in the continued design of this project. To ensure that your views are considered, we have provided this sheet for your convenience. Comments should be returned to ADOT&PF by November 7, 1997.

ILIAMNA - NONDALTON ROAD IMPROVEMENTS

Project No. 51951

PUBLIC SCOPING MEETINGS:

- Monday, October 27, 1997 in Iliamna
- Tuesday, October 28, 1997 in Nondalton
- Tuesday, November 4, 1997 in Anchorage

(Please Print)

NAME: Gory Zackar
MAILING ADDRESS: Gen-Del.
CITY, STATE, ZIP: Nondalton, Ak 99640

COMMENTS

I would like to see the road go in, because it would cost cheaper to get freight from Iliamna to Nondalton, and it will be easier on medical emergencies. and we expect a lot of people in the future. People will probably start there own tourist business, it will bring income in to the community.

Note: To mail, fold along solid lines on the back of this sheet and tape or staple, so that the address is shown.

WRITTEN PUBLIC COMMENTS

Your input is an important element in the continued design of this project. To ensure that your views are considered, we have provided this sheet for your convenience. Comments should be returned to ADOT&PF by November 7, 1997.

RECEIVED

ILIAMNA - NONDALTON ROAD IMPROVEMENTS
Project No. 51951

NOV 03 '97

PUBLIC SCOPING MEETINGS:

- Monday, October 27, 1997 in Iliamna
- Tuesday, October 28, 1997 in Nondalton
- Tuesday, November 4, 1997 in Anchorage

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr. <i>JD</i>		
Locations		
Env. Team Leader		
Staff <i>ACN</i>		
Project File		
Central File		

(Please Print)

NAME: Jerry Armstrong

MAILING ADDRESS: Box 86

CITY, STATE, ZIP: Iliamna Ak. 99606

COMMENTS

I live here and I would like to see the road completed because it is easier to quit than complete and easier to destroy than build. We need to complete what we started and continue to build a climate of success. Quitting now will only create a climate of finger pointing and frustration that is very hard to break.

Jerry Armstrong

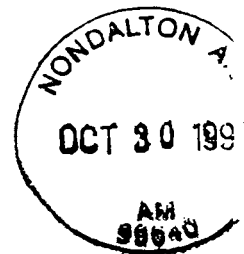
Note: To mail, fold along solid lines on the back of this sheet and tape or staple, so that the address is shown.

Trucks, 4-wheelers, and bulldozers as no bridges exist on half of Lem. At other sites stream banks are being destroyed as heavy equipment splashes off Lem into the Newhalen River to drive across as there is no bridge. Aggie and I started Red Alaska to show people the wild Alaskan wilderness. A bridge certainly isn't going to be a favorite attraction, but, it beats trying to explain suicide hill, or the dozer crossing. It's always so beautiful to stand knee deep in crystal clear water with geyling and rainbows all around you and have to have to look and stumble over a set of dozer tracks coming across the river and going up the beach. They never disappear, the tracks. A CE is enough - lets fix this problem before it's too late. Any impacts are certainly positive. Thank you!

FOLD HERE FIRST

FOLD HERE SECOND

PLACE
STAMP
HERE



Susan N. Wick, Environmental Team Leader
Alaska Department of Transportation and Public Facilities
Preliminary Design and Environmental
P.O. Box 196900
Anchorage, AK 99519-6900

Handwritten signature or mark in the bottom right corner.

WRITTEN PUBLIC COMMENTS

Your input is an important element in the continued design of this project. To ensure that your views are considered, we have provided this sheet for your convenience. Comments should be returned to ADOT&PF by November 7, 1997.

ILIAMNA - NONDALTON ROAD IMPROVEMENTS

Project No. 51951

PUBLIC SCOPING MEETINGS:

- Monday, October 27, 1997 in Iliamna
- Tuesday, October 28, 1997 in Nondalton
- Tuesday, November 4, 1997 in Anchorage

(Please Print)

NAME: Eva LeVeque

MAILING ADDRESS: P.O. Box 062

CITY, STATE, ZIP: Nondalton, Alaska 99640

COMMENTS

Some of the reasons I have for wanting the road and bridge to go through between Nondalton and Iliamna are very good and a necessity for this community. Along the same lines it would be a detriment and very dangerous, as have been proven in the past, to allow the cancellation of this project.

On a personal level, I have gone through the ice while crossing the lake in 1995. My husband went through while crossing in 1986. My son went through the ice in 1996 while crossing. Those kinds of statistics alone should be enough to warrant a bridge in my opinion.

I've known everyone in Iliamna and Newhalen all my life and am not able to visit them unless the weather permitted depending on the time of the year. During freeze-up there isn't access to those villages except by air, the same happens during break-up. If I don't have the money to take an airplane which is usually the case, I am not able to see my relatives and friends. If the road and bridge went through, I would be able to go and visit at a whim which would make for a healthier social life. There are stores, restaurants and social activities that would be accessible to me provided the road and bridge went through. Right now, if our students wanted to go to Iliamna for a game they would have to fly because the lake is in the middle of freezing. To charter an airplane is costly therefore the children are not able to go as often as they would if the road and bridge were in place. Not to mention *our high school students* attend social events between the two communities as scheduled without having to wait on the weather, or just not attend because of the season.

Costly freight school programs for students between the schools hinders us tremendously.

Note: To mail, fold along solid lines on the back of this sheet and tape or staple, so that the address is shown.

I work as a substance abuse counselor and service Iliamna, Pedro Bay and Wondalton. I am able to service Iliamna one time a month because of costs, I have to fly back & forth. If the road and bridge goes through I would be able to service Iliamna twice a week which would make a tremendous difference to the people. After all our people are ~~our~~ our most important asset.

To stop the road and bridge project would hinder our services available.

I am employed with Bristol Bay Area Health Corporation. Last and very important if there were an emergency in Iliamna I would be able to respond night or day no matter what the weather conditions.

WRITTEN PUBLIC COMMENTS

Your input is an important element in the continued design of this project. To ensure that your views are considered, we have provided this sheet for your convenience. Comments should be returned to ADOT&PF by November 7, 1997.

ILIAMNA - NONDALTON ROAD IMPROVEMENTS

Project No. 51951

PUBLIC SCOPING MEETINGS:

- Monday, October 27, 1997 in Iliamna
- Tuesday, October 28, 1997 in Nondalton
- Tuesday, November 4, 1997 in Anchorage

(Please Print)

NAME: Melvin LeVeque

MAILING ADDRESS: PO BOX 14@

CITY, STATE, ZIP: Nondalton, Alaska 99640

COMMENTS

I have lived in Nondalton since 1986. My first winter there I broke through the ice on two occasions while traveling to Iliamna. On both occasions I was traveling with local residents and we were on the marked trail across the lake, so it was not attributable solely to my relative inexperience. The first time through the ice, if I had been by myself, I would never have been able to pull myself out of the water before freezing.

I am currently the manager for the Alaska Commercial Company, and speaking from an economic standpoint for the area, completion of a road connection between Nondalton, and the airport hub in Iliamna would greatly benefit the residents of both communities through lower cost of living; an important factor in these days of welfare reform. The prices charged in our locality are much higher than they would be if there was not the added transportation cost of re-shipping goods once they have been landed in Iliamna. Cost for items in any business reflect transportation costs, and we are currently subjected to double paying transportation. With the needed completion of a road connection between our villages, the price of merchandise would go down, because it would cost us less to drive them to Nondalton ourselves than it costs to have them flown from Iliamna.

In summary, I have experienced both physical danger, and economic penalty attributable to no road connection, as has most of our residents, and I strongly support the Road And Bridge project between Iliamna & Nondalton.

Note: To mail, fold along solid lines on the back of this sheet and tape or staple, so that the address is shown.

RECEIVED

NOV 07 '97

9500 Prospect Drive
Anchorage, Alaska 99516-1062

November 5, 1997

By CERTIFIED MAIL - RETURN RECEIPT

Ms. Susan N. Wick,
Environmental Team Leader
Alaska Dept. of Transportation & Public Facilities
P. O. Box 196900
Anchorage, Alaska 99519-6900

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		/
Project Mgr. <i>Dickens</i>		/
Locations		
Env. Team Leader <i>Wick</i>		/
Staff <i>HL</i>		/
Project File		/
Central File		/

Re: RE-SCOPING: Iliamna Road Improvements
Project No. STP-0214(3)51951

#51951

Dear Ms. Wick:

Pursuant to your letter to me of October 7, 1997, I am providing the following factual comments and questions on the proposed Iliamna-Nondalton road, including the proposed bridge crossing the Newhalen River.

I request that my letter be included in the comment record regarding the re-scoping process. I also request that, as is your Department's legal obligation, each of the issues I have raised in this letter be specifically and completely addressed in any environmental impact statement environmental assessment, or other administrative process which result from your re-scoping of the above-referenced project proposal.

I have a basic question which relates to the scoping process which is presently taking place: Under normal federal requirements, "scoping" precedes the preparation of an environmental impact statement (EIS). Regarding the proposed project, the State of Alaska has given no indication that anything more than an environmental assessment (EA) will be prepared. If an EIS is not prepared, will the state's EA respond to each of the questions or comments which have been submitted to it during this re-scoping process?

My specific questions and comments are as follows:

1. What is an honest assessment of the negative impacts of the project on the existing high-quality commercial fishing and sport-fishing resources of the Newhalen River?
2. Does the State of Alaska presently own a valid, existing right-of-way for the road over the entire distance from Iliamna to Nondalton?
3. What role has the possible development of Cominco's Pebble Beach copper mine had in the location and design of the road project?
4. What role has the possible development of Cominco's Pebble Beach copper mine had in the size and design of the Newhalen River Bridge?

Ms. Susan M. Wick
November 5, 1997
Page 2

5. Are federal design approval and funding available for the construction of a highway bridge which will provide only one lane of vehicular travel?

6. May federal FHWA funds, including ISTEA funds, legally be used to design and construct a road which the state has classified as a "local road" or a "rural minor collector"?

7. Is the proposed project properly classified as road "reconstruction," when in fact the State of Alaska had never constructed, improved or maintained a public road north of Alexy Creek to the Newhalen River?

8. Is the proposed project properly classified as road "reconstruction," when in fact the State of Alaska had never constructed, improved or maintained a public road from the Newhalen River 1.7 miles to the road segment (1.3 miles in length) which links a material site to the village of Nondalton?

9. Does Section 4(f) of the Federal Aid to Highways Act (Dept. of Transportation Act of 1966, P. L.. 89-670) apply to this proposed project?

10. What "significant impacts on the quality of the human environment" have been identified in the scoping and planning of the proposed project?

11. What are the secondary and cumulative effects of the proposed project on the existing brown bear population in the area?

12. What are the secondary and cumulative effects of the proposed project on the existing trophy sport fishery in the Newhalen River?

13. What are the secondary and cumulative effects of road access to Nondalton on the purposes and existing character of Lake Clark National Park?

14. Can the entire proposed project realistically be built with the funding amount requested? If it cannot be, what parts of the proposed project will be deleted or deferred?

15. With approximately 12 to 15 highway vehicles in Nondalton, what is the cost per vehicle of this proposal to provide road access from Nondalton to Iliamna?

Ms. Susan M. Wick
November 5, 1997
Page 3

16. Given the present number of residents of Nondalton, what is the cost, per person and per household, of this proposal to provide road excess from Nondalton to Iliamna?

17. What is the calculated benefit-cost ratio of the proposed project?

18. Is the calculated benefit-cost ratio for this project within the established range which is acceptable to justify proceeding with funding and construction of the project?

19. What are all of the reasonable the alternatives, including wetlands conservation alternatives prescribed by 23 United States Code Section 103 and 133, to funding and constructing the proposed road and bridge?

20. Have the state's plans and costs for this proposed project which have been submitted to the Federal Highway Administration been done in compliance with 18 United States Code Section 1020 (which imposes sanctions against state employees who knowingly submit false statements, representations or reports for the purpose of obtaining FHWA approval and funding for a project)?

21. Does the State of Alaska's official statewide transportation plan required by 23 CFR 450.22 exist, and is the proposed project included in such a plan?

22. Has the State of Alaska annually adopted the comprehensive, intermodal, long-range transportation plan for the state which is required by Alaska Statute 44.42.050 (a); and if so, is the proposed project in that annual plan?

Thank you for the opportunity to comment on this proposed project during the re-scoping process and comment period. I request that each of these questions be adequately addressed in the Environmental Impact Statement which I believe should be the proper outcome of your re-scoping effort.

Please retain my name and address on your participant address list, so that I may be assured of receiving further notices and information during or following your re-scoping process.

Sincerely yours,



Thomas E. Meacham

HICKEY & ASSOCIATES

Planning * Management * Lobbying

RECEIVED

Telephone (907) 586-1063
 Fax (907) 586-1097

211 Fourth Street, Suite 108, Juneau, Alaska 99801
 E-Mail "mhickey@eagle.ptialaska.net"

NOV 07 '97

(SENT VIA FAX)

November 6, 1997

Ms. Susan N. Wick
 Environmental Team Leader
 Central Region, Division of Design & Construction
 Department of Transportation & Public Facilities
 P.O. Box 196900
 Anchorage, Alaska 99519-6900

Re: Iliamna Road Improvements Project No. STP-0214(3)/51951

~~Susan~~
 Dear Ms. Wick:

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.	<input checked="" type="checkbox"/>	
Project Manager	<input checked="" type="checkbox"/>	
Locations		
Env. Team Leader	<input checked="" type="checkbox"/>	
Staff HL	<input checked="" type="checkbox"/>	
Project File	<input checked="" type="checkbox"/>	
Central File	<input checked="" type="checkbox"/>	

It was nice seeing you again at the scoping meeting on November 4. I wanted to provide some written comments to supplement that discussion.

I have been working in support of completing this project for the last three years as a transportation consultant and lobbyist on behalf of the Lake and Peninsula Borough. I also have a history with the project dating back to my tenure as commissioner between 1987 and 1991. Finally, I bring over twenty years of experience working as a transportation professional in Alaska, with an extensive history of looking at similar projects in rural areas throughout the state.

I fail to understand how anyone can propose a logical argument that this project is something other than the completion of transportation improvement project started twenty years ago. I think the record is quite clear that the intent from the beginning has been to develop a road link between the communities of Nondalton, Iliamna and Newhalen.

It was suggested during the meeting that the Alaska Department of Transportation and Public Facilities (DOT/PF) has previously made decisions to not support the project, including around the 1986 time frame. While I cannot speak to the specific record during 1986, I can tell you with complete certainty that the department strongly supported completion of this project during my tenure as commissioner, which started in March 1987 and ended in January 1991. There is a record that can clearly support this statement, including several attempts to gain a general fund appropriation to construct the bridge and finish the road into Nondalton. The department also transferred a surplus bridge out to the area for use on the project, an action which was taken I believe during the mid 1980's.

Ms. Susan N. Wick

-2-

November 6, 1997

You heard some excellent testimony from local residents during our meeting describing the numerous benefits that would result if the bridge and hard link is built. I'm quite comfortable that any objective, independent analysis will find significant justification to proceed. At a minimum, this project will provide the following benefits:

1. Local transportation will be safer and more reliable. Residents will no longer have to risk their lives trying to cross the ice during the winter, or risk a flight during marginal conditions in an emergency. The ability to gain access to the Iliamna Airport will be greatly improved, which is important for medivac use and general travel.
2. Transportation costs will be reduced significantly. Current estimates show that an average of 25% or more of the cost to transport goods and people in and out of Nondalton is related to the leg between Iliamna and Nondalton.
3. The communities in the region will experience reduced costs to provide essential services. For example, infrastructure development and related operating costs can be reduced for basic services such as medical, education, and fire/police by sharing facilities, equipment and human resources. Another example is the opportunity to develop a regional landfill if this project is completed.
4. Environmental benefits will be gained. A considerable amount of the fuel used by Nondalton currently moves on or across the river, often in small, unstable skiffs. Switching these movements to truck deliveries will greatly reduce the potential for fuel spills into the river. Fuel storage for the area can also be consolidated, which will bring attendant environmental and cost savings.
5. Residents of all three communities will see an improved quality of life and more economic opportunity. In addition to the value of the previous benefits, there will be an increased ability to enjoy more social interaction and to pursue economic opportunities in the general area because of more safe, affordable and reliable transportation.

By all accounts, this project enjoys tremendous support from all parts of the immediate region. I recall hearing extensive and universal support two years ago during an informal meeting in Nondalton which Commissioner Perkins attended, which included numerous individuals from Iliamna and Newhalen who made the extra effort to make it into Nondalton to participate in the hour and a half session. In my experience, it is certainly rare to see this level of almost universal support.

Ms. Susan N. Wick

-3-

November 6, 1997

It is clear that the principal objection to this project comes from a single Anchorage resident who owns property nearby, and who enjoys considerable financial wherewithal to, in the written words of his attorney, "oppose this project by any and all means, including to litigate to block the project." The basis for this objection apparently is a concern about the aesthetic or visual impact from the bridge, and a concern that the project will result in increased demand on the sport fish resource.

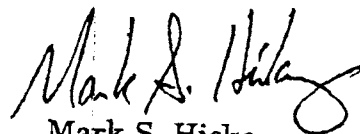
As far as the aesthetic issue, I fail to understand how the safety and basic quality of life of some many Alaskans can be sacrificed for that reason. However, I need to disclose that I happen to be someone who finds bridges aesthetically pleasing, at least more pleasing than grotesquely large, ostentatious vacation homes in the middle of a National Park and Preserve, such as the one being built by the party objecting to the project.

On the issue of resource impact, I believe all concerned agree the full range of benefits and impacts should be analyzed. However, it needs to be pointed out that the existing road stretches the length of the Newhalen River today, with numerous landings available to gain access to the river and connected water bodies. Given these facts (which has been the case for nearly twenty years), I fail to see why completing the bridge and road into Nondalton alone will bring numerous, additional sport fish users into the area. I would suggest continued improvements of the Iliamna Airport such as the new crosswind runway, will likely create more pressure on the resource than this project ever could.

This project is one of the of strongest rural, surface transportation projects I've seen during my entire career as transportation professional. As a former commissioner, I must observe that it would be a public policy tragedy of the worst kind for the department to deny the 300 to 500 long time residents of this area this valuable transportation improvement on the basis of the objections raised to date.

Thank you for the opportunity to submit these comments.

Sincerely,



Mark S. Hickey
Principal

cc. The Honorable Joe Perkins, DOT/PF Commissioner
Walt Wrede, Manager, Lake and Peninsula Borough

false representation as to a material fact in any statement, certificate, or report submitted pursuant to the Federal-Aid Road Act approved July 11, 1916, as amended and supplemented.

At this point, I am concerned about four matters and the manner in which they have been represented previously in the application for a Categorical Exclusion (CE) in December 1995, the Statewide Transportation Improvement Program for FY 1996-1998 and related certifications, amendment No. 4 to the STIP for FY 1997-98 and related certifications, draft and final versions of the SCIS, documents submitted for FHWA signature of and approval of the CE, and documents prepared for use by the public and other agencies.

First, the EA needs to accurately represent the quality, quantity and character of the work to be performed.

ADOT has consistently represented, and still represents, that the work to be performed north of the bridge site is reconstruction of an existing road. However, in the litigation, the answer of the United States concedes that in this area the route is an ATV trail, as plaintiffs have maintained all along. Furthermore, the United States has conceded that one cannot drive a conventional highway vehicle, other than some form of all-terrain vehicle, from Iliamna to Nondalton. On the other hand, in its SCIS, ADOT represented the work to be performed north of the bridge site as reconstruction by "widening the existing embankment." Yet, ADOT records and photographs, including statements and photos in the original CE application, state or show that there is simply an ATV trail. Furthermore, no person and no record ever has suggested that there has ever been any construction, ever, between the bridge site and the 1.3 miles of road built in 1994 at Nondalton. So, I would cease calling the ATV trail a "pioneer road" susceptible to "reconstruction." Pioneer roads have a legal definition. I would be careful about continuing to represent that the work to be performed north of the bridge site as "reconstruction" or "widening an existing embankment." Over the past two years I pointed out these facts prior to the litigation, yet ADOT persists in representing the whole project as some form of reconstruction. I have a hard time believing that employees in ADOT do not know the facts.

Along the same vein, the EA needs to accurately represent the quality, quantity and character of the work to be performed between Alexy Creek and the bridge site. ADOT has represented the work between Alexy Creek and the bridge site as reconstruction and resurfacing. The records indicate there is no road bed, surface or grade and that only tundra has been removed, and the 1995 CE application concedes as much. If there is no road bed or surface, I would be careful about continuing to represent that the work to be performed is "reconstruction." Again, I do not believe employees in ADOT can straightforwardly represent this work to be performed as "reconstruction" and "resurfacing" when they also

acknowledge they know there is no road bed or surface.

Second, the EA needs to accurately represent the full costs of a project. 23 USC 135(f) in effect requires disclosure of full costs of all projects. It provides that a project, or a phase of a project, shall only be included in a STIP if full funding can be anticipated to be available within the time period contemplated for completion of the project. ADOT has represented completion of the road and bridge to FHWA as costing \$ 5 million. All previous estimates have been much higher. In 1986, ADOT put the cost at about \$ 12 million. In 1987, ADOT put it at about \$ 19.5 million at federal standards. On April 12, 1995, ADOT prepared various estimates for various alternatives. Those which involved a new bridge and road ranged from \$ 14.7 million to \$ 17.1 million. Even the borough has estimated the cost at \$ 9.5 million. All of this had been pointed out prior to the litigation, and yet ADOT has represented, pursuant to 23 USC § 135, that the full cost of completing the road-and-new bridge project as \$ 5 million. Again, I hope you will be careful about such representations.

Third, the EA should accurately represent the fact that the route is classified, pursuant to ISTEA, by ADOT and FHWA, as a public road only from Iliamna to Alexy Creek. ADOT has represented the whole route as an existing public road under non-federal definitions in order to claim a categorical exclusion from NEPA and assert that the project and the work to be performed is modernization of an existing highway. I would be careful about making representations to FHWA that the route for purposes of federal law is a "public road" when ADOT and FHWA have not classified it as such north of Alexy Creek.

Fourth, the EA needs to accurately represent the history of maintenance. The record indicates no maintenance north of Alexy Creek and very little maintenance north of three miles north of the Iliamna Airport. As I recall public roads are defined in terms of maintenance, so I would be careful about representing this as an existing public road north of Alexy Creek. Again, ADOT's SCIS said that the road is periodically maintained north of Alexy Creek, but ADOT records say that it not the case.

In short, in the re-scoping and subsequent processes, ADOT employees need to avoid any knowing misrepresentations of a material fact, such as the costs of the project and the nature of the work to be performed.

2. The draft statement of need seems very biased and subjective. I hope it will be revised for purposes of the EA to include data about costs, the resources and uses of them, the values of those uses, and the prior findings that the road is not economically justified and was discontinued in 1986 for that reason.

3. Is the State doing scoping under NEPA regulations at 40 CFR

Parts 1500-1508, or not? If the State is trying to do scoping under the NEPA regulations, then it should abide fully by 40 CRF 1501.7. It appears there has yet to be a notice of intent to prepare, or a decision to prepare, an EIS, and scoping comes after that decision and notice. 40 CFR § 1501.7. If this is scoping for an EA will additional scoping occur if a decision is made to do an EIS?

4. As part of the scoping process, state and federal officials should identify and decide whether to address within the scoping process all issues, or some issues, related to Alaska Sportfishing Assoc., et al. v. Ruby, et al., No. A97-205 CV (JKS). Regardless of what issues are addressed in the EA, the initial identification of issues should include all of those in plaintiffs' complaint or otherwise raised in the case, all those in the records referred to that case, all those in previous records that led to the litigation including plaintiffs' consultants, and all those in previous records related to the road or proposed road.

5. I have enclosed, so that they are part of the record, a copy of the complaint and most of the documents referred to in the complaint. I will supplement these documents in the future.

B. Specific Scoping Comments

1. Comments About This Re-scoping Process

1. What has FHWA determined is the role of ADOT in preparing environmental documentation?

2. What form of notice has been given of this re-scoping and what are those notices?

3. Will ADOT be preparing an EA for FHWA approval, or will ADOT do studies to submit to FHWA for use in preparing an EA?

4. Will ADOT or FHWA respond to comments on any draft EA it prepares and what is ADOT's understanding if FHWA prepares the EA?

5. Who and what agencies received the re-scoping invitation under 40 CFR 1501.7(a)(1)?

6. Will ADOT or FHWA provide plaintiffs and the public with its determination of the scope under 40 CFR 1501.7(a)(2) and its eliminations under 40 CFR 1501.7(a)(3)?

7. If ADOT prepares an EA for FHWA approval, will ADOT identify how ADOT or FHWA will comply with each relevant element of 42 USC § 4332?

8. Has ADOT requested other agencies with jurisdiction by law to be cooperating agencies?

9. What is ADOT and/or FHWA doing to allocate responsibilities between lead and cooperating agencies under 40 CFR 1501.7(a)(4) and between joint lead agencies under FHWA's NEPA regulations?

10. Are there any other EAs or EISs which are or will be prepared and which relate to the Iliamna-Nondalton project under 40 CFR 1501.7(a)(5)?

11. Will ADOT or FHWA comply with 40 CFR 1501.7(a)(6)&(7)?

12. Will the EA address any of the 23 criteria in 23 USC § 135?

2. Comments About Issues To Be Addressed in Scoping

1. Is the route currently a public road, and if so, how much of it is?

2. Who owns the Right-of-Way and under what legal interpretation do they own it?

3. What are the full costs of construction at what standard of construction, given that cost estimates have ranged from about \$ 5.5 million in 1997 to \$ 20.0 million in 1987? What accounts for this decline in costs?

4. What are the maintenance costs?

5. Why is the road economically justified now when it was not in 1976, not in 1986, and in light of the improvements made to the Nondalton airport after or in response to the 1986 decision to discontinue the project?

6. Address ADF&G Habitat Division comments of January 3, 1997 regarding increased pressure on local fish and game stocks.

7. In light of ADF&G comments, what is the impact on rainbow trout age and size distribution in the population of trout that migrate within the Kvichak drainage?

8. What is the impact of the project on crowding in the Newhalen River and in other rivers in the vicinity?

9. What is the economic value, in terms of expenditure value and net willingness to pay, of the rainbow trout in the Newhalen and area streams in relation to crowding, target species and amenities, under different levels of use? Rainbow trout are the most popular target species in the area streams according to studies. What is the economic impact of the proposed road on these trout fisheries in terms of economic production and price structure?

10. What is the economic value, in terms of expenditure value and net willingness to pay, of the salmon fisheries in the Newhalen and

area streams in relation to crowding, target species and amenities, under different levels of use? King salmon are the second most sought after species (second to rainbow trout) in the adjacent Nushagak, Mulchatna, Koktuli, Stoyuhok drainages according to the studies. What is the economic impact of the proposed road on these fisheries in terms of economic production and price structure in relation to increased use? There is, or has already been, a cap on sport harvest of kings in these drainages in order to protect commercial and subsistence opportunities. We all know that fishing packages in the Iliamna area include these streams in the Nushagak drainage as well as the Newhalen and streams in the Kvichak drainage. So, will making the whole of the Newhalen road accessible increase the pressure on the trout and salmon stocks in the area? If so, what is the effect of that in terms of fish populations, the character of the fisheries, and conflicts between them?

11. What is the economic value, in terms of passive use value? It seems to me that the Newhalen River, as substantially unroaded and wholly unbridged river, having the largest sockeye salmon escapement in the United States, and being an essential brown bear concentration stream, and having world-class trout and trout fishing, is a resource of national and international significance. The economic values of such resources are not merely local or reflected only in market economics. This river has intrinsic value far beyond those who actively use it for commercial, recreational or subsistence purposes. That value should be assessed in order to comply with NEPA.

12. Why is construction of the road a cost-effective strategy, given the previous improvements to the Nondalton airport?

13. Can STP monies be used on local roads and rural minor collectors or is the state planning on building with state monies?

14. Everything that might be discovered in court related to the proposed Pebble Beach mine should be disclosed in the EA.

15. Alternatives need to be more fully explored. Instead, ADOT has prejudged the question of alternatives by limiting them to those which improve overland access between Nondalton and Iliamna.

Other uses of the money must be considered.

There may be more worthy road projects. When ADOT discontinued the project in 1986, ADOT decided to pursue other means to improve transportation into Nondalton and thereafter decided that the best alternative was to improve the Nondalton airport rather than build the road. Why is that alternative now rejected after the Nondalton Airport has been improved? In the past, ADOT also considered alternatives involving no bridge.

Wetland alternatives, including mitigation, restoration and planning are also permitted under 23 USC § 133 and should be explored. Fisheries are a function of wetlands. Any cursory review of the state's fishing regulations shows that road access, in conjunction with the population in Southcentral, has closed or restricted king salmon, coho salmon, trout, dolly varden, and grayling fisheries all over the road system in Southcentral. Every clear water, road-accessible, king salmon stream from Homer to Talkeetna is either totally closed by the Board of Fisheries to king salmon fishing or closed but for a small portion which is open on a few long weekends. Every clear water, road-accessible, coho salmon stream from Homer to Talkeetna is either totally closed to coho fishing or closed but for a small portion. In these streams, rainbow trout fishing is also restricted by catch-and-release, no-bait, and spawning closures. Other protective regulations have been imposed on some of the road accessible grayling stocks and I believe also on some nonanadromous dolly varden stocks.

The point is that when roads provide access for more people than a particular resource management scheme can sustain, then regulatory access to the resource by means of fishing has to be restricted in order to protect the resource.

An alternative use of the money at issue could be to mitigate some of these losses of regulatory access by acquiring conservation easements and physical access easements along rivers, where legal physical access does not exist due to private property development which has resulted from roads. That kind of mitigation of the loss of the wetland function of fishing would mitigate the loss by increasing and dispersing recreational opportunities.

16. Are federal monies available for a one-lane bridge and if so, under what authority?

17. What is the application of "section 4(f)" in this instance?

18. Significant Impacts. The Kvichak-Newhalen drainage is a generally thought of as the best of the so-called "world-class" trout fisheries in Alaska. The Newhalen's upper reaches are one of the few relatively uncrowded reaches of the trout streams in the drainage since the Copper River, the Gibraltar River, Lower Talarik, and the Kvichak at Koskanhok flats (Iliamna Lake outlet) are so readily accessible by planes and lodges. Since the level of crowding is the chief factor by which anglers determine where to go, is making the Newhalen River road accessible a "significant" impact?

19. In general, under NEPA, you need to take a hard look at secondary and cumulative impacts to trout, brown bear, levels of crowding, loss of relatively unique uncrowded fisheries, conflicts between users groups in some area (e.g. chinook in the adjacent Nushagak-Mulchatna drainages), and the existing character of Lake

Clark National Park and its levels of use.

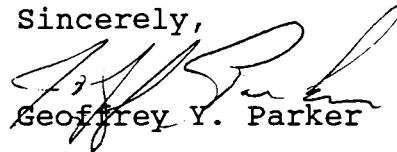
20. What is the cost per highway vehicle in Nondalton and per household in Nondalton?

21. How is this project consistent with the state's Statewide Transportation Improvement Plan?

22. Has the State adopted the transportation plan required by AS 44.42.050?

23. What were the matters that were "significant" and were affected by FHWA's request that all references to "significant" be deleted from the SCIS, according to Helen Lons' memo to the file of July 24, 1996? How will the EA address those matters?

Sincerely,

A handwritten signature in black ink, appearing to read "Geoffrey Y. Parker", is written over the typed name.

Geoffrey Y. Parker

enclosure

CROSS REFERENCES

Certification of invoices. 22 USCS §§ 4200 et seq.
 Sentencing guidelines. Statutory Index. Sentencing Guidelines for U. S. Courts,
 18 USCS Appendix.

RESEARCH GUIDE

Am Jur:

32 Am Jur 2d, False Pretenses § 87.

Annotations:

What constitutes a public record or document within statute making falsification, forgery, mutilation, removal, or other misuse thereof an offense. 75 ALR4th 1067.

§ 1020. Highway projects

Whoever, being an officer, agent, or employee of the United States, or of any State or Territory, or whoever, whether a person, association, firm, or corporation, knowingly makes any false statement, false representation, or false report as to the character, quality, quantity, or cost of the material used or to be used, or the quantity or quality of the work performed or to be performed, or the costs thereof in connection with the submission of plans, maps, specifications, contracts, or costs of construction of any highway or related project submitted for approval to the Secretary of Transportation; or

Whoever knowingly makes any false statement, false representation, false report, or false claim with respect to the character, quality, quantity, or cost of any work performed or to be performed, or materials furnished or to be furnished, in connection with the construction of any highway or related project approved by the Secretary of Transportation; or

Whoever knowingly makes any false statement or false representation as to a material fact in any statement, certificate, or report submitted pursuant to the provisions of the Federal-Aid Road Act approved July 11, 1916 (39 Stat. 355), as amended and supplemented,

Shall be fined under this title or imprisoned not more than five years, or both.

(June 25, 1948, ch 645, § 1, 62 Stat. 753; Oct. 31, 1951, ch 655, § 27, 65 Stat. 721; May 6, 1954, ch 181, § 18, 68 Stat. 76; Oct. 15, 1966, P. L. 89-670, § 10(f), 80 Stat. 948; Sept. 13, 1994, P. L. 103-322, Title XXXIII, § 330016(1)(L), 108 Stat. 2147.)

HISTORY; ANCILLARY LAWS AND DIRECTIVES**Prior law and revision:**

This section is based on Act June 19, 1922, ch 227, § 4, para. 6, 42 Stat. 661 (former 23 U.S.C. § 46).

The words "highway, or related" were inserted before "project" in two places for the purpose of description, in view of the transfer from Title 23. The words "upon conviction thereof" were omitted as surplusage, because punishment cannot be imposed until a conviction is secured.

Changes in phrasology were made.

RECEIVED

Moody's Petroleum

NOV 12 '97

P.O. Box 158
Iliamna, Alaska 99606
Phone: 907-571-1278
Fax: 907-571-1453

November 7, 1997

Susan N. Wick, Environmental Team Leader
Alaska Department of Transportation and Public Facilities
Preliminary Design and Environmental
P.O. Box 196900
Anchorage, Alaska 99519-6900

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr.		J. Dickerson
Public Facilities		
Env. Team Leader		
Staff		ALN
Project File		
Control File		51951

Re: Iliamna-Nondalton Road Improvements

A common misperception regarding the Iliamna-Nondalton Road is that it is a new road proposed for an area through which access, prior to this time has been quite limited.

A great deal of commerce, travel, and general economic activity already transpires on the existing road. People use it to haul freight, fuel, and groceries year round. During the summer, the lodges use the road to haul clients and taxicabs use it to haul passengers. Emergency medical services have also been made available to the communities of Nondalton, Newhalen, and Iliamna via this road system. Individuals have depended on the existing road to commute daily back and forth to job sites. Without the existing route, opportunities for employment would be even more limited in the communities than they already are.

The electric line, owned and maintained by the electric utility, runs alongside the existing road. Major investments were made this summer approximately halfway up the existing road corridor, constructing the Tazimina Hydroelectric Plant and the spur road which connects to the existing Nondalton Highway, and installing the new transmission line from the hydroelectric plant to feed all three communities.

The existing road system connecting the villages of Newhalen, Iliamna, and the airport, already traverses through a great deal of private property and no one thinks a thing about them.

Although the bridge would admittedly be new construction, its installation and completion has prior support through resolutions by the residents of all three communities. The bridge would allow safe year-round commerce and economic activities to occur and would ultimately lower the cost of living to the residents of Nondalton.

The bridge would also allow the existing powerline which goes under Six Mile Lake to be rerouted to a safer course: namely above ground, alongside the bridge itself.

Completion of the road would in a sense "fix" a problem that has existed since the project was unfortunately not completed in the mid-1980s.

Although an environmental assessment has been undertaken, the "Secondary and Cumulative Impacts Study" completed in May 1996 by Community Planning, evaluated the environmental issues and determined no significant impact. The study consulted with a wide range of the public, representing many diverse viewpoints, and fairly assessed the potential impacts of this proposal. It seems unfortunate that the time and expertise invested in evaluating the potential impacts and the conclusions which resulted based on this work, have been largely ignored.

It is hoped that despite a potential two-year delay, that funding for construction and completion of the Highway is not lost. This Highway is a vital component of the infrastructure of the affected three communities, remains a priority, and should be completed.

In the interim, while more discussions and studies commence, the locals will be conducting commerce, engaging in economic activity, and traversing a road which has existed for over 10 years, and which most already consider part of the existing road system.

Sincerely,

A handwritten signature in cursive script that reads "Bob Arce".

Bob Arce
CEO

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN & ENVIRONMENTAL



TELEPHONE RECORD

DATE November 26, 2001
TO Deb Liggett
POSITION Superintendant
REPRESENTING National Park Service
TELEPHONE 271-3751
FROM Kristen Hansen *KH*
PROJECT Iliamna Nondalton Road
PROJECT NO. 51951

I called Deb Liggett, Superintendant of Lake Clark National Park & Preserve, to make sure that they were aware of the project and to give the National Park Service an opportunity to comment. I also wanted to make sure the NPS concurred with ADOT&PF's determination that no constructive use will occur as a result of this project (as defined by 23 CFR 771.135), and that 4(f) does not apply.

Deb said that they are aware of the project, as they communicate on a regular basis with WaltWrede (Lake & Peninsula Borough). She said that they fully support Nondalton's efforts to get this road and bridge constructed, and they do concur that no constructive use will occur as a result of this project, and that 4(f) does not apply. She would like us to send her a copy of the draft EA and information regarding the lawsuit (she's curious on what basis the suit was brought to court).

cc: File

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN & ENVIRONMENTAL



TELEPHONE RECORD

DATE October 1, 2001
TO Wayne Dolezal
POSITION Habitat Biologist
REPRESENTING ADF&G
TELEPHONE 267-2333
FROM Kristen Hansen *KH*
PROJECT Iliamna-Nondalton Road
PROJECT NO. 51951

I called Wayne to discuss the following issues FHWA recommends including in the EA:

- 1) What is ADF&G's opinion on the potential for indirect/secondary impacts to fish & wildlife due to potentially increased sport fishing and hunting?
- 2) What is ADF&G opinion on the issue of potential indirect/secondary impacts to subsistence use of the fish & wildlife resources in the area?
- 3) Is the project consistent with the SW Alaska Rainbow Trout Management Plan?
- 4) What is the status of the agreement with City of Nondalton re: construction of a boat launch on Sixmile Lake?

Wayne said that the 1st three issues were adequately addressed in the EA, and ADF&G doesn't have any concerns with the project, as long as the stipulations in the Title 16 permit are adhered to.

The boat launch is still pending a decision on the City's part. (ADF&G sent a proposal to the City over 2 years ago, and the City has not signed off on it yet.)

cc: File



MEMORANDUM

STATE OF ALASKA

Department of Transportation and Public Facilities
Central Region - Design and Engineering Services
Preliminary Design and Environmental

To: Stefanie Ludwig
Archaeologist
State Historic Preservation Office

Date: November 21, 2001

Project: Iliamna-Nondalton Road
Improvements
Project No. 51951

From: Kristen Hansen *KH*
Environmental Analyst

Subject: Finding of No Effect

Per our discussion, I am submitting updated information for the subject project in order to obtain the SHPO's concurrence with our Finding of No Effect. As I explained on the phone, our project files indicate that SHPO concurred with a Finding of No Effect on October 18, 1996. However, we cannot find the actual memo from SHPO in our files. Therefore, we are requesting that written concurrence from SHPO in a Finding of No Effect be re-issued.

Project History:

SHPO recommended in 1995 that ADOT&PF conduct an archaeological survey of a portion of the project corridor. This survey was conducted by OHA during the summer of 1996, and included the entire right-of-way between the Newhalen River and the material site near Nondalton (shown on Figure 1). Based on the results of the investigation, they recommended that DOT seek the concurrence of the SHPO in a Finding of No Effect. Our project files indicate that the SHPO concurred with this finding on October 18, 1996.

Changes to Project Since 1996:

The only change that has occurred in the project design since 1996 is the addition of a boat launch and small parking lot at the proposed bridge site, as shown on Figure 5 (attached). The boat launch was added to this project as a result of ADF&G concern that without a nearby boat launch alternative, the public will access the river next to the bridge anyway and damage the river banks. Comments were received on the three options shown on Figure 5 during the EA review. The majority of commenters prefer a boat launch on Sixmile Lake within the City of Nondalton. ADF&G has agreed to partner with the City of Nondalton to locate and construct a site, however no agreement has been signed (as of 10-1-01). To ensure that a public launch is provided, ADOT&PF has obtained permits to construct a launch at the proposed bridge site as a backup

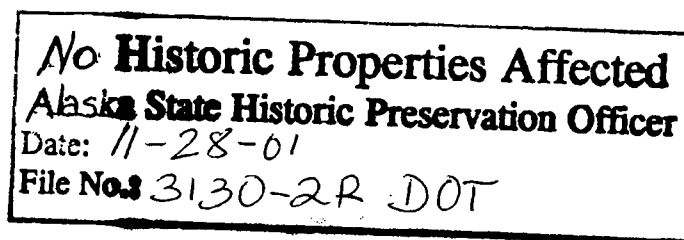
measure in the event the City of Nondalton does not provide an alternative launch before this project is constructed.

The launch would consist of a ramp of concrete planks that would be approximately 4 meters (13 feet) x 12 meters (39 feet); a gravel launch access road that would be approximately 4 meters (13 feet) x 50 meters (164 feet); and a gravel parking lot that would be approximately 20 (65 feet) x 36 (118 feet).

Since the improvements for the boat launch and parking lot would be within the area already surveyed by OHA, we believe that the original survey and Finding of No Effect remain valid. We are requesting SHPO's written concurrence with this assessment.

Attachments: Figures 1 and 5

cc: John Dickenson, P.E., Project Manager, Highway Design
Susan Wick, Environmental Team Leader, PD&E



Due to the high volume of reviews, our office is no longer writing letters of concurrence in cases where there are no historic properties affected by a given project. Instead, the cover letter is being stamped with "No historic properties affected" and being returned to the applicant. The stamp will serve as evidence of consultation with the State Historic Preservation Office as required by Section 106 of the National Historic Preservation Act. We will continue writing letters in situations where there are historic properties that may be affected by a given project.

**LAKE AND PENINSULA BOROUGH
RESOLUTION 01-25**

A RESOLUTION EXPRESSING STRONG AND CONTINUING SUPPORT FOR THE ILIAMNA-NONDALTON ROAD PROJECT AND PROVIDING FOR ROUTINE MAINTENANCE.

WHEREAS, the Iliamna-Nondalton Road project has been at the top of the Borough's CIP and Transportation Priorities List for the past ten years, and

WHEREAS, this regional project will connect the communities of Iliamna, Newhalen, and Nondalton with surface transportation and provide inter-modal benefits by connecting all three communities to the regional airport and dock/barge landing facilities in Iliamna, and

WHEREAS, the social and economic benefits associated with this project are well documented and they include economic development and job creation, reduced shipping and transportation costs, enhanced efficiency in the delivery of government services, improved education and health care programs, and improved environmental conditions along the road corridor, and

WHEREAS, the Federal Highway Administration and the Alaska Department of Transportation and Public Facilities have asked the Borough to reaffirm its support for this project and its commitment to provide for basic, routine maintenance after construction is complete.

NOW THEREFORE BE IT RESOLVED, that the Lake and Peninsula Borough hereby certifies that its support for the Iliamna-Nondalton Road project is as strong as ever and that the project remains # 1 on the Borough Transportation Priority List, and

BE IT FURTHER RESOLVED, that the Assembly finds that the sharp downturn in the commercial fishing industry and the recent series of declared economic disasters in the Borough makes the justifications for this project stronger than ever, and

BE IT FURTHER RESOLVED, that the Assembly hereby reaffirms its commitment to provide for basic and routine maintenance on the road after construction is complete in partnership with the communities of Iliamna, Nondalton, and Newhalen and in accordance with a Maintenance Agreement approved by DOT/PF and the Borough.

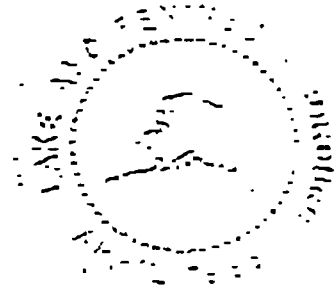
PASSED AND APPROVED by a duly constituted quorum of the Lake and Peninsula Borough Assembly this 16th day of October, 2001.

IN WITNESS THERETO:


Glen Alsworth Sr., Mayor

ATTEST:


Sheila Bergery, Borough Clerk



STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN & ENVIRONMENTAL



TELEPHONE RECORD

DATE	September 17, 2001
TO	Jerry Armstrong
POSITION	General Manager
REPRESENTING	Iliamna-Newhalen-Nondalton Electric Co-Op (INNEC)
TELEPHONE	571-1259
FROM	Kristen Hansen <i>KA</i>
PROJECT	Iliamna Nondalton Road
PROJECT NO.	51951

I called Jerry to discuss the following issues FHWA recommends including in the EA:

1) Does INNEC have plans to expand the Tazimina River Hydroplant operation ?

Jerry replied that they're willing to expand if new developments occur in the area. However, they don't have any current plans for expansion.

2) If so, will it expand as a result of the proposed Iliamna-Nondalton road / bridge project?

No. They already have electricity across the river at Nondalton. So the road and bridge would not cause their operation to expand.

3) Does the current road hamper the functioning of the plant or limit it in any way?

Yes. The lack of a bridge to Nondalton actually affects the overall efficiency of the entire electric coop operation. They once calculated that it cost nearly 33% more to construct or repair electric utility items in Nondalton due to the extra costs incurred by the lack of a bridge. These costs included having to handle materials and poles several times to get them to Nondalton and general lack of productivity of crews while having to leave their service trucks behind and attempting to cross Six-Mile Lake in skiffs or by snow machine.

cc: File

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN & ENVIRONMENTAL



TELEPHONE RECORD

DATE September 27, 2001
TO George Cole, V.P.
REPRESENTING Cominco
TELEPHONE 509-922-8787
FROM Kristen Hansen KH
PROJECT Iliamna-Nondalton Road
PROJECT NO. 51951
REGARDING update on the Pebble Copper Project

I called to find out the latest situation regarding Cominco's plans for developing the Pebble Copper Project for inclusion in the Final Iliamna-Nondalton Road EA.

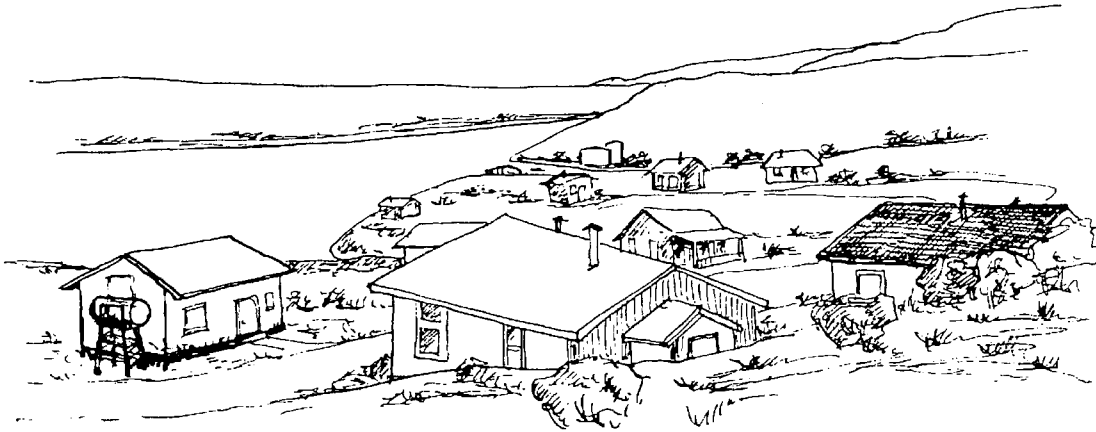
First of all, Mr. Cole wanted to let me know that Cominco had merged with another company, and they are now called Teck Cominco.

The Pebble Copper Project has still not been determined to be economically feasible. They still haven't found reserves of high enough grade. They do have plans for a drilling plan next year. If they find reserves of high enough grade, they would continue with 2-3 more years of delineation drilling. At that point, they would conduct a 1-2 year feasibility study to determine whether or not to move forward with the project. So, nothing has changed since the EA and the Secondary and Cumulative Impacts Study was written. In the absence of a major new discovery at the Pebble Copper deposit or a substantial increase in world copper prices, it appears that the 1-2 year feasibility analysis for the mine continues to be on hold for the foreseeable future.

cc: File

APPENDIX B

Secondary and Cumulative Impacts Study of the Proposed Iliamna-Nondalton Road Reconstruction



Project No. 51951

January 1997

Prepared for:

Department of Transportation and Public Facilities
Preliminary Design and Environmental
P.O. Box 196900
4111 Aviation Avenue
Anchorage, Alaska 99519-6900

Prepared by:

Community Planning
3100 C Portage Bay Place East
Seattle, Washington 98102

Table of Contents	I
List of Abbreviations	iii
I. Purpose	1
II. Project Description	4
III. Road History	6
IV. Local Setting	
A. Geography	9
B. Iliamna and Nondalton Communities	11
C. Demographics and Census Characteristics	12
D. General Land Ownership	13
E. Study Area Ownership and Land Use	14
F. Fish and Wildlife Resources	17
G. Subsistence	19
H. Private Property Values	21
I. Public Safety and Fire Protection	21
J. Emergency Medical Services	21
K. Education	22
L. Transportation Facilities	23
M. Proposed Transportation Projects	24
N. Commercial Activities	27
O. Tourism	29
P. Communications	33
Q. Utilities and Fuel	34
R. Cominco Mine	35
S. Local Regulations	36
V. Secondary and Cumulative Impacts of the Alternatives	
A. Key Assumptions	39
B. Likely Secondary Impacts From Reconstruction	45
C. Likely Secondary Impacts Without Reconstruction	52
D. Likely Cumulative Impacts From Reconstruction	56
E. Likely Cumulative Impacts Without Reconstruction	59
VI. Appendix	
A. List of Personal Communications	61
B. Bibliography	63
C. Relevant Statutes and Regulations	66
List of Photos	
Photos 1 & 2	8
List of Figures	
Figure 1 Location Map	
Figure 2 State and Vicinity Map	
Figure 3 Iliamna-Nondalton Road / Regional Projects	
Figure 4 Keyes Point Subdivisions Land Use	

List of Tables

Table 1	Population Iliamna	12
Table 2	Population Nondalton	13
Table 3	Nondalton & Iliamna Per Capita Harvests	20
Table 4	Price Comparison	27
Table 5	Sport Fishing Effort	30
Table 6	Hunter Success	32
Table 7	Caribou Hunting Effort	33

LIST OF ABBREVIATIONS

AADT	Average Annual Daily Traffic
ACC	Alaska Commercial Company
ACMP	Alaska Coastal Management Program
ADCRA	Alaska Department of Community and Regional Affairs
ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADOT&PF	Alaska Department of Transportation and Public Facilities
ANCSA	Alaska Native Claims Settlement Act
ANILCA	Alaska Native Interest Land Claims Act
ATV's	All-terrain vehicles
BBAP	Bristol Bay Area Plan
BBCRSA	Bristol Bay Coastal Resource Service Area
BBNC	Bristol Bay Native Corporation
BBSD	Bristol Bay Tourism Development
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
CE	Categorical Exclusion
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CRSA	Coastal Resource Service Area
DCRA	Department of Community and Regional Affairs
FAA	Federal Aviation Administration
FHWA	Federal Highway Administration
GMP	General Management Plan
GMU	Game Management Unit
HUD	Housing and Urban Development
INIT	Iliamna Nondalton Intertie
INL	Iliamna Natives Limited
INNEC	Iliamna-Newhalen-Nondalton Electric Cooperative
LCNPP	Lake Clark National Park and Preserve
L&PB	Lake and Peninsula Borough
mph	miles per hour
NEPA	National Environmental Policy Act
NMCRS	Nushagak-Mulchatna Commercial Recreation Study
psf	pounds per square foot
STIP	State Transportation Improvement Program
USCG	U.S. Coast Guard
USCOE	U.S. Army Corps of Engineers
VPSO	Village Protection and Safety Officer

I. Purpose

The purpose of this report is to identify and evaluate the cumulative and secondary impacts likely to result from the reconstruction and completion of the road from Iliamna to Nondalton and the no-action alternative. This report identifies and describes potential and cumulative secondary impacts, determines their magnitude, and augments the Alaska Department of Transportation and Public Facilities (ADOT&PF) National Environmental Policy Act (NEPA) documentation for the proposed project. Secondary impacts are defined as effects which are "*caused by an action and are later in time or farther removed in distance, but are still reasonably foreseeable*" (40 CFR 1508.8). Secondary impacts have a connection, or nexus, between the proposed action and the secondary or indirect impact. Cumulative impacts are effects which "*result from the incremental consequences of an action when added to other past and reasonably foreseeable future actions*" (Federal Highway Administration, 1992). The Federal Highway Administration (FHWA) will determine whether any of these identified impacts are significant and whether further NEPA documentation is necessary.

Cumulative and Secondary Impact Analysis has no precise approach or method. However, the FHWA's Project Development Branch has established a number of planning principles which have been applied in this study to identify and evaluate secondary impacts related to the Iliamna-Nondalton Road. These include:

1. Time Period

FHWA recommends that the design life of the project be used as the maximum length of time that the project contributes to secondary impacts. The design life of the roadway is 20 years. This report presents two future time frame scenarios; near-term (5-10 years) and long-term (10-20) years.

2. Area of Influence

Cumulative and secondary impact studies normally cover the area within which traffic levels are affected by the proposed project. Broader areas can also be considered due to the multi-modal nature of existing transportation systems and long established inter-connected relationships between communities. Several communities not on the Iliamna-Nondalton Road are referenced in this study. Generally, the study area is from Iliamna and Newhalen north to the Nondalton and Port Alsworth communities and the general area in between Iliamna Lake and Lake Clark (see figure 1).

Report Approach

The degree of precision in evaluating cumulative and secondary impacts depends upon available information, as well as the time and budget devoted to the research. This report presents the current socio-economic and planning situation, and then compares potential impacts both with and without the project over a twenty-year period. The twenty year period is divided into a near term scenario and a long term scenario. Cumulative and secondary impacts may or may not be significant and may be either positive, negative or neutral. This report is based upon a literature review, person to person interviews

and site investigations. A reconnaissance visit was made to Iliamna and Nondalton to interview permanent and part-time residents. The communities of Newhalen and Port Alsworth were also visited to assess potential impacts. Much of the information in this report comes from individual accounts and interviews. Data on fish and game resources, socio-economics, recreation and other customary subjects is compiled for the specific project area. In most cases, as with much of rural Alaska, data is aggregated for much larger areas or smaller discrete units. Where possible, the individuals who gather data were asked to give their best professional judgement as to the breakdown of aggregated data for the study area.

The Iliamna-Nondalton Road project has been planned and funded as a single and distinct project that contains a road and a bridge. Project segmentation is not an option. ADOT&PF would only construct the complete project. Constructing the project as a series of smaller projects is not an option. Therefore, the project is addressed as a whole, as required by NEPA, and not as separate pieces.

Regulatory Compliance

ADOT&PF has and is following the FHWA regulations for NEPA compliance. This report is not intended to replace FHWA NEPA documentation. This report supplements and will be appended to the environmental documentation. State and federal Alaskan resource agencies were sent a scoping letter/request during mid-1995. Formal notice of the scoping process was published in the Anchorage Daily News on October 25, 1995 and the Bristol Bay Times on October 26, 1995. A meeting on the road project was conducted in Nondalton by ADOT&PF on May 25, 1995. An agency field trip to the site was made on July 14, 1995. The Lake and Peninsula Borough (L&PB) was contacted and invited to comment. During the formal scoping process no major problems were identified by ADOT&PF, other state and federal agencies or the public. The project has been reviewed by the State Historic Preservation Office and a limited survey made which has resulted in a finding of no effect on historic resources.

This project is part of the approved State Transportation Improvement Program (STIP). AS 44.42.050 establishes the process for the annual STIP (see Appendix C). The STIP is reviewed annually and approved by both the Governor and the state legislature. The development of a STIP by ADOT&PF involves a multilayered grading and ranking process for projects that evaluates many factors. The draft STIP is submitted for review to local governments, state agencies, federal agencies and other organizations. Costs of a project are a consideration, but given the unique transportation situation in Alaska, costs are not given a controlling role.

Environmental permits originally issued in the mid 1980's have been complied with, but several new permits would be required from local, state and federal agencies. ADOT&PF would comply with all permitting requirements. Much of the permitting review process would take place under the L&PB approved Coastal Management Plan. The coastal management program is the primary tool by which the Alaska Permit Reform Act functions to enable efficient processing of required permits at all levels. All new

federal, state and local permits required for the project would undergo a complete review under this system. The construction of the bridge would be in compliance with Alaska Dept. of Fish & Game (ADF&G), U.S. Coast Guard (USCG), and U.S. Army Corps of Engineers (USCOE) permit requirements. The following are the environmental permits which may be needed for the project:

1. USCOE Section 404/10 and/or Nationwide permits 23 and/or 3 would be required. Any discharge of dredged or fill material below the ordinary high water line of the river and/or riverbed excavation for the placement of any piers or structures would require a Section 404 permit. Authorization under Section 10 may also be needed, as the Newhalen River may be classified as navigable.
2. USCG Bridge Permit
3. ADF&G Title 16 Anadromous Stream Permit
4. L&PB Development Permit for work near anadromous streams

II. Project Description

Iliamna-Nondalton Road

The Iliamna-Nondalton Road project was included in Governor Knowle's Transportation Initiative in June of 1995. The project is included in the STIP. ADOT&PF has scheduled \$750,000 for design for fiscal year 1996 and \$5,000,000 for construction in 1998. The project has been approved by the Alaska State Legislature prior to expenditure of scheduled funds. The proposed reconstruction of the Iliamna-Nondalton Road would provide a year-round overland connection between two communities, Iliamna and Nondalton (see figures 1,2,3). Iliamna is located on the north shore of Iliamna Lake and Nondalton is on the west side of Sixmile Lake. Completion of the project would result in a year-round road between the Iliamna state airport and the city of Nondalton.

The Iliamna-Nondalton Road project would upgrade the existing pioneer roadway north of the Alexcy Creek bridge. The reconstructed roadway would be approximately 20-foot wide, gravel surfaced, with two traffic lanes. The roadway would be resurfaced using suitable material which is readily available within the right-of-way. The road profile which has deteriorated would be reestablished. Drainage problems, such as side cutting at low spots around culverts and muddy sections, would be corrected to bring the road into accordance with ADOT&PF standards. The reconstructed roadway would reestablish the used traffic lanes within the legal right-of-way. The project would connect to the city of Nondalton local road system. The existing roadway from the north side of the Newhalen River to the material site on the southwest side of the city would be upgraded from pioneer road status and connected to the existing city road system. About 16 miles of roadway would be upgraded, improved and brought up to standards. The majority of the existing roadway is in poor but passable condition and needed upgrading would be a substantial part of the project. The road is in poor unfinished condition from the Alexcy Creek bridge to the Newhalen River. The roadway south of Alexcy Creek to the Iliamna airport on the east side of the Newhalen River has received minimal maintenance and repair. This section of the Iliamna-Nondalton Road would receive the least upgrades under this project. Some slope stabilization would take place around existing culverts above the high water mark of Bear and Lovers Creeks.

The bridge over the Newhalen River would be a one lane, one way bridge, 540 feet long, with a 14 foot travel way and a 17 foot overall width. The proposed one lane bridge superstructure would consist of 4 steel stringers supporting precast concrete deck panels. A cast-in-place concrete curb would support the metal bridge railing. No asphalt overlay is planned at this time. The bridge would be supported by five piers spaced about 118 feet apart. Each pier would consist of three 30 inch diameter steel pipe piles. Four of the five piers would be placed below the ordinary high water elevation. Some aspects of the bridge design have not been finalized therefore other particulars about the bridge are not available.

Almost all of the right-of-way for the roadway has been acquired with only about two acres unresolved. The project would be confined to the existing roadway corridor. No relocation of existing structures or uses would be necessary to rehabilitate the existing roadway. An erosion and pollution

control plan would be required from the contractor to be approved prior to construction start-up. All new construction materials, free of contaminants, would be used for both the roadway and bridge. The bridge and roadway would not impact any new wetland acreage. Fill requirements are estimated at 500 cubic yards for the bridge and 37,000 cubic yards associated with the road rehabilitation and construction.

No-Action Alternative

The no-action alternative would not upgrade the existing road between the two communities. The existing situation, with no complete overland road connection between Iliamna and Nondalton, would prevail. The existing roadway would remain without improvements and have only minimal maintenance. The existing roadway would continue to be used by both local residents and summer and fall visitors. Traffic would continue to drive off-road to bypass muddy or difficult sections of the roadway which would widen the footprint impacted by traffic. The drainage problems on the northern section of the road would not be addressed.

III. Road History

The road north from Iliamna was begun in 1942 by the military during construction of the airfield. The old road began at the airfield and continued on to a boat launching site on the Newhalen River north of the rapids. The landing site and old road are still used today to access the river and Nondalton. The completion of the Iliamna-Nondalton Road as a state project was first formally proposed in 1972. A poll was conducted in 1974 in Nondalton regarding connection to Iliamna and Newhalen by road; the results were favorable. The project design was nearly completed in 1976 when it was shelved for a variety of issues.

In 1983 the legislature appropriated \$1.5 million and in 1984 \$3 million for the revived project now called the Iliamna-Nondalton-Intertie project or I-N-I-T road. The key objectives stated in a legislative report (House Transportation Committee 2/15/83) on the road connection were economics, service delivery improvement, reduction of the cost of fuel and other goods in the sub-region. The Iliamna-Nondalton Inter-Tie group was conveyed funds in 1984 to construct the I-N-I-T. Resource agency permits were received for the road and bridge in 1984, however only a portion of the project was completed during 1985 and 1986 before funding was exhausted. The key stumbling block to successful completion of the road was the bridge over the Newhalen River. A used bridge was transported to Iliamna but was not suitable for the project. The original intent of the I-N-I-T project was to construct a full two lane community road and bridge between Iliamna and Nondalton. After the initial two fundings, no further state assistance was granted for over a decade. Like other projects initially funded, but not completed, future funding was rare as the state capital budget decreased from the high levels of the early 1980's.

According to an ADOT&PF field report in March, 1986 the clearing and grubbing was completed from the beginning of the project in Iliamna to Alexcy Creek. From Alexcy Creek to the Newhalen River and Nondalton, about half of the corridor has been cleared. The existing road extends about 14.4 miles north of the Iliamna Airport to the Newhalen River. Most of the culverts were properly installed. The report noted that with more blading of the roadway, two-wheel drive access would be possible most of the time.

Another multi-agency field inspection was carried out on July 14, 1995. The report noted that the road was still in good condition from the airport to Alexcy Creek bridge, about 9.5 miles. The bridge is in excellent condition since recent work (1995) has replaced the original structure and further protected Alexcy Creek from erosion. The inspection team drove to the proposed bridge site on the east side of the Newhalen River. The existing natural substrate, glacial till, serves as a suitable road surface along most of the roadway. The trail on the north side of the river to Nondalton was accessed from the river and inspected.

As of the summer of 1996 the nearly completed section of the Iliamna-Nondalton Road south of the proposed river crossing site to the bridge at Alexcy Creek is in good shape. Access to the proposed bridge site using conventional two-wheeled drive vehicles is possible during much of the year when not blocked by snow or except for a few areas that become soft during very wet conditions. The most

significant problem encountered during 1996 is that water is channeled down the road surface and then cuts off to the side at the bottom of low areas leading to erosion of the road embankment into anadromous streams.

The existing roadway qualifies under 17 AAC 005.30 (see Appendix C) as several different types of off-system roads. The roadway on the west side of the Newhalen River proceeds for 1.7 miles to the material site outside of the city of Nondalton, meeting criteria under 17 AAC 05.030 (b) as a trail. All-terrain vehicles (ATV's), snowmachine and some four wheel drive vehicle traffic is common during the winter months. The remaining 1.3 miles from the material site to the Nondalton airport were reconstructed and improved in 1994 as part of a Nondalton airport project and qualifies as a community road under 17 AAC 05.030 (e).

The road north from Alexcy Creek to the bridge site meets the requirements of 17 AAC 05.030 (c) for a basic access road and has received only occasional maintenance. This section of roadway to the proposed bridge site has never received a proper surface and the road profile has deteriorated. The culverts installed ten years ago to allow fish passage and proper drainage are still functioning and in good shape. Although the road is properly culverted, where the road crosses small drainage features at the bottom of a hill or creek, the runoff from the road surface has cut the side embankment in several places. This road surface run-off has introduced sediment and fines into drainages of the Newhalen River. Several areas of this section of the roadway consist of soft materials, such as silty volcanic ash, and are difficult to traverse in wet weather or break-up. Vehicles commonly leave the existing road right-of-way in these areas to get around the soft spots. This off-road activity has significantly widened the area impacted by erosion (see photos 1, 2). In some areas the out of bounds traffic has endangered the Iliamna-Newhalen-Nondalton Electric Cooperative (INNEC) buried cable which runs parallel to the existing road right-of-way.

South of Alexcy Creek to the Iliamna airport the roadway meets the criteria under 17 AAC 05.030 for a community road. This section of road has had regular maintenance and the Alexcy Creek bridge is new. A portion of the roadway is heavily used, by local standards, to access the boat landing on the Newhalen River.



Photo 1. ILIAMNA-NONDALTON ROAD - May 18, 1996. Expanded footprint.
Increased off-road activity due to substandard roadbase.



Photo 2. ILIAMNA-NONDALTON ROAD - May 18, 1996. Expanded footprint.
Increased off-road activity due to substandard roadbase.

IV. Local Setting

A. Geography

The proposed road project is located on the gently rolling hills bordering the northern shore of Iliamna Lake, within the Bristol Bay Lowland, a moraine and out-wash mantled plain rising from sea level to 500 feet. The lowland is bounded by the Ahklum Mountains to the northwest and the Aleutian Range to the southwest. Between Iliamna and Nondalton several areas of glacial era dunes are visible. Iliamna Lake is the largest lake in the state. Of glacial origins, it is very deep and held in by end moraines. The Kvichak River is its outlet. Lake Clark lies among the foothills where the Alaska and Aleutian Ranges merge. The southern end of the lake is shallow and known as Sixmile Lake. The Newhalen River drains Sixmile Lake and the Lake Clark system into Iliamna Lake. The Newhalen River freezes over in most areas each year, but changing currents and a variable rate of flow make the ice dangerous for travel.

Permafrost is present in the general area but it has not been mapped in detail. Local construction activities have not encountered significant permafrost conditions. The numerous water wells in the area are also an indication of the lack of permafrost. Thin layers of soils over shallow bedrock occur on lower slopes and in valleys. Locally, the soils are gravelly glacial till capped with a shallow mantle of volcanic ash. Recently formed organic soils occur in bogs and muskeg areas. The muskeg contains coarse acid moss and sedge peat. Areas of shallow surficial soils that consist of high amounts of volcanic ash are difficult to develop due to a high plasticity index. The bedrock consists primarily of sedimentary rocks with inter-bedded volcanics (old lava flows) which are occasionally intruded by igneous rocks.

Iliamna

Iliamna lies in the transitional climatic zone with strong maritime influences. Average summer temperatures range from 42° to 62°F. Average winter temperatures range from 6° to 30°F. The record high is 91°F and the record low is -47°F. A low temperature of -20°F can be expected every 13 years. Total precipitation averages 26.20 inches annually, with an average snowfall of 64.3 inches. Based on available data, a building in Iliamna with a life expectancy of ten years must be able to withstand a snow load of 59 pounds per square foot (psf); 25 years, 77 psf; 30 years, 80 psf; 50 years, 91 psf; and a structure expected to last 100 years must be able to withstand snow loads of 107 psf.

Winter winds blow predominantly from the north northeast, with average velocities of 10 to 12 miles per hour (mph). Summer winds blow from the east southeast and average 9 to 10 mph. The overall wind speed averages 10 mph with calm occurring 9 percent of the time. A building in Iliamna with a life expectancy of ten years should be built to withstand 90 mph winds; 25 years, 100 mph; 50 years, 110 mph; and a structure expected to last 100 years must be able to withstand 120 mph winds.

There are four gravel sites in Iliamna which can easily supply the village needs for many years. Only one site is presently being used. The USCOE has rated Iliamna flood potential as average. A 20 percent

inundation of the village could occur once in 40 to 60 years. Iliamna is in Seismic Zone Two, where earthquakes between 4.5 to 6.0 on the Richter Scale may occur and cause moderate damage.

Iliamna is surrounded by upland spruce-hardwood forest interspersed with large expanses of tundra. White spruce with scattered paper birch, quaking aspen, and balsam poplar occupy moderate south facing slopes. Black spruce grows on northern slopes and poorly drained flat areas. Cool, moist slopes have a spongy moss undergrowth and dry slopes are covered with grass. Willow, alder, and dwarf birch grow in high open forests near timberline. High bush cranberry, fireweed, lupine, monk's hood, cottongrass, and horsetail are common.

Nondalton

Nondalton lies on the western shore of Sixmile Lake, which extends from the southwestern end of Lake Clark. Nondalton lies in the transitional climatic zone. Little weather data is available for Nondalton, however, the major climate characteristics are very similar to Iliamna. Winter winds in Nondalton blow predominantly from the north and northeast, with average velocities of 10.1 to 11.6 mph and gusts of up to 50-60 mph. Summer winds blow from the east and southeast, and average 8.5 to 9.6 mph. Nondalton is known for fierce wind storms which often limit travel into and out of the community. Based on available data, a building in Nondalton with a life expectancy of ten years should be built to withstand 90 mph winds; 25 years, 100 mph; 50 years, 110 mph; and a structure expected to last 100 years must be built to withstand 120 mph winds. The region is rough and mountainous, with steep rocky slopes.

Nondalton is surrounded by upland spruce-hardwood forest. White spruce with scattered paper birch, quaking aspen, and balsam poplar occupy moderate south facing slopes. Black spruce grows on northern slopes and poorly drained flat areas. Cool, moist slopes have a spongy moss undergrowth, dry slopes are covered with grass. Willow, alder, and dwarf birch grow in high open forests near timberline. High bush cranberry, fireweed, lupine, monk's hood, cottongrass, horsetail, and a variety of other plants and wildflowers are common.

Shallow bedrock and steep slopes pose severe limitation for development. Storm driven waves are the only flood concern. Nondalton is within Seismic Zone Two, where an earthquake between 4.5 to 6.0 on the Richter scale may cause moderate damage. A large gravel pit is located to the west of the city and has an adequate supply of gravel for local needs.

B. Iliamna and Nondalton Communities

Over the years travel, communication and social interaction between Iliamna and Nondalton have increased. Despite different ethnic backgrounds and tribal affiliations, the two communities have grown closer. Many families have members in both communities and travel between the two communities is common year-round. Inter-marriage between families in Nondalton and Iliamna are no longer rare occasions. Festivals and school sporting events are equally attended by members of the two communities. The telephone, television and modern transportation have broken the traditional isolation and separation of the area.

Iliamna

Iliamna is located on the north side of Iliamna Lake, 225 miles southwest of Anchorage and 187 miles east-northeast of Dillingham. Prior to 1935, "Old Iliamna" was located near the mouth of the Iliamna River. A post office was established there in 1901. Around 1935, the Indian village moved to its present location, approximately 40 miles from the old site. The post office followed and retained the name Iliamna. Much of Iliamna's current size and character can be attributed to the development of fishing and hunting lodges. Iliamna is an unincorporated community located within the L&PB and therefore does not have any municipal powers. The village's native population (mostly Yupik in origin) is represented by a five member traditional council. Council elections are held each fall. The council has been recognized by the Bureau of Indian Affairs (BIA) as the official governing body of the village. The council is entitled to participate in various state and federal programs. The village council owns a front-end loader and leases a ten-yard dump truck. The Indian Health Service drilled a 270 foot well (cased to bedrock) in 1978. The village connected the well to the community building for use as a public water source. Most residents have private wells, including a few artesian wells up to 150 feet deep. Virtually all the houses in Iliamna have septic tanks with drainfields. The landfill is located five and one-half miles from the village, about two miles past the airport on the way to Newhalen. The village council manages the site and has fenced the area to prevent paper from being blown around by the wind. Garbage is taken to the landfill on an individual basis. There is an existing extensive community road system at Iliamna, about 56 lane miles of road. This road system provides interconnections throughout the village of Iliamna and access to the state airport facility. This road system also connects to the city of Newhalen about 2½ miles to the southwest.

Nondalton

Nondalton is located on the west shore of Sixmile Lake, 15 miles north of the village of Iliamna and 200 miles southwest of Anchorage. Nondalton is a Tanaina Indian name, first recorded in 1909 on a field sheet by D.C. Witherspoon of the U.S. Geological Survey. The village is ethnically Athapaskan native. Nondalton was originally located on the north shore of Sixmile Lake. In 1940, when wood which was used for fuel was depleted in the surrounding area, and growing mud flats made it increasingly difficult to reach the lake, the village moved to its present location. A post office, established at the old site in 1938, moved

with the town. Nondalton was incorporated as a second class city in 1971. It has a seven member city council from which the mayor, vice mayor, and secretary/treasurer are elected. The regular election is held each October. The council meets the second Tuesday of each month. As a second class City within the L&PB, Nondalton is able to assume a variety of powers under Title 29 of the Alaska State Statutes. The city has adopted a broad range of powers that include; streets and sidewalks, sewers and sewage treatment facilities, health services and hospital facilities, police protection and jail facilities, water, a community center, a library, a recreation facility, garbage and solid waste collection and disposal, fire protection service and facilities. The city recently received a \$600,000 grant through the Village Safe Water program to construct a Class II landfill and incinerator. The city participates in the state revenue sharing program in which funds are allocated on a per capita basis for community services. The city imposes a three percent sales tax which generated \$4,514 in revenues in 1995. Nondalton has a much less extensive community road system than Iliamna, about one-sixth the size. The basic grid pattern in Nondalton extends from a material site on the southern end of the community to the state airport on its northern end.

C. Demographics and Census Characteristics

Iliamna

Since it was first counted in the 1939 U.S. Census, Iliamna's population steadily grew until the late 1980's (see Table 1). A local census conducted in 1982 found 104 residents. That growth is most likely due to Iliamna's emergence as a transportation and recreational center for the Iliamna Lake-Lake Clark area. The population declined 30 percent during the last years of the 1980's decade. In 1980, the population was 60 percent white and 40 percent native (mostly Tanaina Athapaskan Indians along with some Eskimo and Aleut). By the 1990 Census the ratio had reversed with about 66 percent of the residents native. In 1990 the median age at Iliamna was 30.0. The 1990 population was split almost evenly between male and female occupants; 52 percent male and 48 percent female. In 1990 there were 11 children less than five years old and 35 people under 21. In the summer, many residents leave Iliamna to fish for salmon and herring in Bristol Bay. Over the course of the summer and fall, over 3,000 sport hunters and fishermen come to the community and stay in the lodges for several days or longer. Many more people visit during this period from Anchorage to sport fish the Newhalen River. Iliamna has shown a new period of population growth in the 1990's increasing by 50 percent in just five years. However the dominant feature of the community population is its seasonal nature. Visitors and part-time summer and fall residents outnumber the year-round residents by 30 to 1.

Table 1. Population Iliamna

Date:	1939	1950	1960	1970	1980	1990	1995
Population:	30	44	47	58	94	66	99

Source: U.S. Dept. of Commerce, Bureau of Census. 1995 State Dept. of Labor estimate.

Nondalton

Since the first census in Nondalton in 1920, the population grew to a peak in the 1960's, declined and then grew to a new peak (see Table 2). Total households were counted by the 1990 U.S. Census as 54 for an average of 3.30 persons per household. Twenty-five of the households were enumerated as married and eight as living alone. The 1990 population was 89.3 percent native (mostly Tanaina Athapaskan or Iliamna Tanaina Indians) down from 93.1 percent native in 1980. In 1990, the median age was 26.1 years up from 23.5 in the 1980 census. Typical of rural Alaska, the population was male weighted (53.2 percent male and 46.8 percent female) in 1990. There were 29 children less than five years old and 77 people (about 43 percent of the total population) less than 21 years old in 1990.

Nondalton has seen a population surge of over 80 percent in five years since 1990. Many people who left the community in the 1970s and 1980s have returned, with their new children, and natural increase has been high.

Table 2. Population Nondalton

Date:	1920	1929	1939	1950	1960	1970	1980	1990	1995
Population:	69	24	82	103	205	184	173	178	227

Source: U.S. Dept. of Commerce, Bureau of Census. 1995 State Dept. of Labor estimate.

D. General Land Ownership

The area surrounding the study area has a mix of land owners that includes federal, state, Native corporation and private individuals (see Figure 3). The majority of the land abutting the Iliamna-Nondalton Road is in private ownership. The road right-of-way crosses four native allotments.

Federal

Aside from native allotments, Lake Clark National Park and Preserve (LCNPP) north of Nondalton is the largest federal holding in the region. The park is headquartered in Anchorage but has a field office in Port Alsworth on the northeast side of the lake. The park is managed in accordance with the General Management Plan (GMP), adopted in August 1984. LCNPP contains about 3,553,000 acres of public land. Section 17(b) of Alaska Native Interest Land Claims Act (ANILCA) established 2,470,000 acres of wilderness within LCNPP. The park also manages several thousand acres of Kijik Corporation lands acquired under an easement around the Tazimina Lakes. The GMP directs the parks management to "achieve its legislated purpose as part of a larger mosaic of regional lands in state, native and private ownership dedicated to a variety of conservation and economic uses." This park is one of the most remote and inaccessible National Parks in southcentral Alaska, only Aniakchak National Monument, near Port Heiden is more remote. Visitor use statistics for the park are good only as a best guess estimate. Many people access the park directly by floatplane and are hard to count. Compared to more accessible parks in the region the overall visitation is low. The federal government also manages numerous native

allotments in the general area. Many allotments are located on the south end of Lake Clark. These allotments, in combination with other private holdings, add up to about 70 percent of the lake frontage outside of the park on the southern shore of Lake Clark.

State

The state owns a large block of land, about 6,500,000 acres to the north and west of Lake Clark. Much of this area drains into Bristol Bay and is managed under the state Bristol Bay Area Plan (BBAP), adopted in 1984. Another large block of state land is near the northeast shore of Iliamna Lake, southeast of the Tazimina Lakes area. The BBAP provides for an array of land uses on state lands in the area and forms the basis for state land classification that governs use on state lands in the area. The state use classification ranges from fish and wildlife habitat to mineral development to settlement.

Native Corporation

The regional corporation, Bristol Bay Native Corporation (BBNC) and the two native village corporations, Kijik and Iliamna Natives Limited (INL) have extensive land holdings in the area. The native corporation lands are managed for the benefit of the shareholders. The regional corporation receives title to both the surface and subsurface estate and the village corporations have only the surface estate. The two local village corporations, INL and Kijik, are the largest private land owners in the area.

Private

Land owned by individuals is a small percentage but important part of the overall ownership pattern in the region. Many parcels are scattered throughout the area and are the product of pre-statehood land disposal by the federal government. A large and newer concentration of private land holdings is at Keyes Point a rural recreational subdivision developed by Kijik corporation (see figure 4). This subdivision is located on a point of land on the west side of Lake Clark about half way between Nondalton and Port Alsworth. The subdivision is very large and contains several phases. The first phase contains 360 lots (including 20 to 30 commercial lots) and a 3,800 foot airstrip constructed in 1987. Over 200 lots have been sold (June, 1996). About ten of the commercial lots are intended to support hotel or lodge operations. A tentative plan, which is on hold, for the northern end of the Keyes Point peninsula includes a 100 room destination resort and subdivision of the surrounding land into 1,200 additional lots. The development has a comprehensive set of land covenants that govern land use and construction. If the subdivision were fully developed, the population would make it one of the ten largest communities in Alaska.

E. Study Area Ownership and Land Use

Ownership Iliamna

Under the Alaska Native Claims Settlement Act (ANCSA) of 1971, Iliamna's native corporation, INL, is entitled to select 71,550 acres of land from the federal government. INL has received an interim conveyance (working title) from the Bureau of Land Management (BLM) to 71,550 acres of unsurveyed land. A patent will be issued once the boundary descriptions are confirmed with a survey. Pursuant to ANCSA, INL receives title to the surface estate while the regional corporation, Bristol Bay Native Corporation (BBNC), owns the subsurface rights. Under Section 14 (c)(3) of ANCSA, as amended, the village corporation must reconvey 1,280 acres, or less if agreed to in writing, to the municipal corporation or to the state in trust. The land to be reconveyed is the land that is presently being used for community purposes, as well as additional land that is necessary for community expansion. Since the village of Iliamna is not incorporated as a municipality, the lands will be reconveyed to and administered by the state in trust for any future municipal corporation. The INL and the Alaska Department of Community and Regional Affairs (ADCRA) have completed a needs assessment to identify 14(c)(3) lands to be conveyed to the state. A map of boundaries has been prepared and sent to BLM for survey. After the survey is complete 107 acres of land will be conveyed to the state as municipal trust lands. A side agreement provides for additional transfers to the state in the future for specific purposes. Under the Native Allotment Act of 1906, the Secretary of the Interior may allot up to 160 acres of land to individual natives, providing the claimant proves continuous use and occupancy. The Act was repealed with the passage of ANCSA, so new claims have not been accepted since December 18, 1971 (although prior applications are still being processed). The ANILCA of 1980 provided for the approval of all pending claims except in cases where a protest has been filed. Certificates are issued once the claims have been officially surveyed. There are several approved native allotments scattered throughout the community. The local ANCSA village corporation, INL, owns much of the land on both sides of the existing roadway on the west side of the Newhalen River. The State of Alaska is a major land owner in the Iliamna community. The state has a quit claim deed to the Iliamna Airport property that covers about 1,500 acres.

Land Use Iliamna

Development in Iliamna covers a large area including the airport, Seversons Point, Roadhouse Bay shoreline, Anelon road, and the ridge behind Slopbucket Lake. There were 27 single family homes identified in Iliamna in the 1990 census, including eight rental units. Only 18 of the total of 30 housing units were occupied during a 1989 census count conducted in the winter. Iliamna has eight lodges in the community that operate seasonally. The eight lodges provide summer housing for the operators, their families and the summer staff (as many as 25 people each). Housing in Iliamna is generally of good quality for the region. This can probably be attributed to the diverse economy and access provided by the airport and barge services on Iliamna Lake. There is a shortage of summer housing in the community due in part to the high cost of building. The seven HUD houses that were constructed in 1982 helped to relieve the shortage for year-round residents. A few families vacate their houses and move to Bristol Bay or the fish camp at the outlet of Sixmile Lake for the summer season. Some families also leave for part or all of the winter. These houses are usually not rented in the owners' absence. A large lodge that has been closed due to financial difficulties is partially open and supplies some living quarters for summer construction crews. The majority of homes for full-time residents are two or three bedrooms. Only a few

lack complete plumbing facilities. In addition to the homes in Iliamna, there are eight lodges, a small hotel, a U.S. Post Office (about half-way between Iliamna and Newhalen), community office building, health clinic, jail, Federal Aviation Administration (FAA) office, ADOT&PF Maintenance shop, an office shared by the state trooper and Fish and Wildlife Service, two air taxi operations, and three aircraft maintenance shops (two are at the airport). The school district facilities consist of one area office. The INNEC headquarters and power plant are located here as well as their associated tank farm. Moody's fuel service has an office and new hangar at the airport apron. Gram's Cafe and the community store are located in the central part of Iliamna near the lodges and Slopbucket Lake.

Ownership Nondalton

Under the ANCSA of 1971, the Kijik Corporation is entitled to select 126,570 acres of land from the federal government. As of August 1996, the corporation has interim conveyance (working title) from the Bureau of Land Management (BLM) to 29,336 acres of unsurveyed land. A patent will be issued after the boundary descriptions are confirmed with a survey. At present, 88,312 acres has been patented to the village corporation. Pursuant to ANCSA, Kijik Corporation has title to the surface estate while the regional corporation, Bristol Bay Native Corporation (BBNC), owns the subsurface rights. Under section 14 (c)(3) of ANCSA, as amended, the village corporation must reconvey 1,280 acres, or less if agreed to in writing, to the city of Nondalton. The land to be reconveyed is land that is presently being used for community purposes, as well as additional land that is necessary for community expansion. Since Nondalton is incorporated, the reconveyed land will be owned and administered by the city. The city and Kijik Corporation have agreed to a transfer of 1,280 acres of land. There are five active native allotment claims in the Nondalton area. Nondalton contains a patented federal townsite of 626 acres which includes six public reserves and a 3.7 acre cemetery reserve. The State of Alaska has a quit claim deed of 1.72 acres to the old school site and a deed to an 18.1 acre parcel within the townsite. The state also owns the airport site.

Land Use Nondalton

There are 56 single family homes in Nondalton and an apartment building with four units. Most houses are wood frame construction, but there are a few log homes as well. Ten new HUD homes are scheduled to be constructed in Nondalton during summer 1997. In addition to the homes and school in Nondalton, there is a community office building, health clinic, the Alaska Commercial Company (ACC) store, recreation hall, several lodges, Russian Orthodox church, community airport and the Arctic Mission. The Nondalton store and the post office share a building.

Road Corridor Ownership

The general land ownership along the roadway is depicted on figure 3. The right-of-way has been acquired for the project, except for 2 unresolved acres. The major land owners adjoining the road are the two local native village corporations, Iliamna Native Limited and Kijik Corporation. The right-of-way

crosses four native allotments, which are trust lands administered by the Bureau of Indian Affairs (BIA). The allottees are, from south to north, Nelliee Drew, Okalena Tretikott, Pete Trefon and Davis Hobson. Another allotment is located on the river about one mile from the road right-of-way. INL has established a shareholder homesite program and transferred parcels, up to five acres in size, to qualified individuals. About six to eight homesites have been transferred along the road to the west between the river and the road. INL has the right of first refusal on future sale of a homesite. The north end of the project will be connected to the public right-of-way in Nondalton. This portion of the road passes through Kijik Corporation lands.

Road Corridor Land Use

Land use along the road corridor is in large part seasonal and part-time. Subsistence use sites and seasonal dwellings are spread throughout the area. The area on both sides of the inlet of the Newhalen River has a significant concentration of camps utilized by local residents. The large number of private lands and access to more populated areas has led to a land use pattern that is typical of many rural areas in Alaska. What may appear "vacant" or "unused" is actually well used by the local residents year-round and by others seasonally. The large number of residences, lodges, part-time dwellings, a regional airport and other infrastructure make it difficult to characterize the study area around Iliamna and Nondalton as wilderness. A spur leading from the existing roadway to the old road and down to the Newhalen River landing is in trespass. The spur provides easier access to the Newhalen River landing than the old road and is favored by locals.

F. Fish and Wildlife Resources

The Kvichak River system with headwaters in Iliamna Lake and Lake Clark, is historically the most important spawning and rearing habitat for sockeye (red) salmon in the world and the largest contributor to the Bristol Bay fishery (Lake and Peninsula Borough Coastal Management Plan). Chinook (king), coho (silver), chum (dog), and humpback (pink) salmon are present in the drainage in lesser numbers. Between 1981 and 1991, escapement of adult sockeye within the Kvichak drainage averaged about 5 million annually compared to 6.4 million for the years 1971-1981. However, runs in the early 1980's were far less. Arctic char/Dolly Varden and grayling are also present. Other freshwater and anadromous species present in the river and lake system include lake trout, whitefish, burbot, and northern pike. State sport fishing regulations single out the Kvichak River drainage as a trophy fish area. Some of the largest rainbow trout in the world can be found in this system.

The known distribution of rainbow trout in the project area includes the Newhalen River from its confluence with Iliamna Lake, upstream to Sixmile Lake and beyond. Tributaries documented to support rainbow trout include the Tazimina River (and all its multiple channels) from Sixmile Lake upstream, Alexcy Creek from its confluence with the Newhalen River upstream to include Alexcy Lake, and one west side tributary to the Newhalen River approximately 5 miles down river from the proposed bridge crossing site. Documented spawning habitat for rainbow trout is only identified for Alexcy Creek and Alexcy Lake.

The ADF&G Anadromous Fish Stream Catalog indicated sockeye salmon occurrence in the Newhalen River from Iliamna Lake upstream to Sixmile Lake (and beyond), the Tazimina River and its multiple channels upstream from Sixmile Lake, Alexcy Creek and Alexcy Lake, and the lower half of Bear Creek. Sockeye salmon spawning was documented only for the Newhalen River, Tazimina River, and Bear Creek. The Catalog indicated the presence of king salmon in the Newhalen River, with spawning documented from Iliamna Lake upstream to approximately 3 miles above the Newhalen Falls. Arctic char are indicated throughout the Newhalen River and Tazimina River; no spawning areas were identified.

It is probable that both rainbow trout and anadromous fish species (king salmon, sockeye salmon, Arctic char) have a greater distribution and occurrence of spawning habitat than is currently documented. The cost of fisheries surveys to document all use areas is both time-consuming and expensive, and is not generally feasible under current resource agency budgets.

The Newhalen River and tributaries in the project area are not recognized as a Brown/Grizzly bear spring concentration area nor as an area of known denning concentrations. Brown/Grizzly bears concentrate along the area fish streams and lake shores during the fall. The Newhalen River and tributaries in the project area are not recognized as important areas for moose calving, rutting, or winter feeding concentration areas. An area of intensive sport hunting for moose is recognized north of Sixmile Lake, but not in the immediately accessible vicinity of the roadway project.

The Mulchatna caribou herd, second largest in Alaska (200,000), ranges over an area north of Iliamna Lake and west of the Alaska Range. The herd is dispersed during late summer and mid-winter. Caribou start to aggregate in late winter and early spring and move toward the calving grounds northwest of Lake Clark near the Mulchatna River. After calving, the herd scatters. By late August, the herd begins moving north to forested wintering grounds north of Iliamna Lake and Lake Clark. Although the distribution of Mulchatna Herd caribou has changed drastically in recent years, the closest documented important use area for caribou was located west of the project area around the upper drainage of Upper Talarik Creek.

The area supports a number of fur-bearers and small game animals. Red fox, porcupines, and short-tailed weasels (ermine) prefer bushy areas in broken terrain. Open areas attract least weasels, lemmings, shrews, voles, Arctic ground squirrels, and tundra hares. Mink, beaver, muskrat, and land otter are found in or near the water. Snowshoe hares prefer stream side areas with bushy under-story. Lynx and red squirrels live in the lowland forests, and wolverine are distributed throughout the area. Wolves are not abundant, but they do range throughout the area in packs of two to 30 animals. Solitary coyotes are occasionally seen near Iliamna. The ADF&G Habitat Guide does not indicate any important trapping areas for fur-bearers in the project area.

Eastern Iliamna Lake supports one of the few freshwater colonies of harbor seals in the world. Some seals probably swim between the colony and Bristol Bay, but some animals remain in the lake year-round. Seals haul out on flat beaches and large rocks close to the water, particularly during pupping. Pups are

born from late May to mid-July. Breeding occurs in July after the pups have been weaned. Harbor seals are primarily fish eaters and may compete with fishermen for sport and commercial fish. Beluga (white) whales have occasionally been sighted in Iliamna Lake where they feed on both adult and immature salmon and freshwater fish.

The area is not heavily used by waterfowl, although greater scaup, scoters, oldsquaw, pintails, mallards, green-winged teal, widgeons, golden-eyes, mergansers, and gadwalls occasionally stop on their way to and from northern nesting areas. Nearly the entire Bristol Bay populations of whistling swans and sandhill cranes migrate up the Kvichak River through Lake Clark Pass. Both species nest in the area. Canada geese and Arctic and red-throated loons also rest, nest, and molt in the area. Shore and water birds are attracted to the same aquatic habitat as waterfowl. Of these, greater yellowlegs, least, western, and spotted sandpipers, glaucous-winged and mew gulls, Arctic terns, dowitchers, and parasitic jaegers are most common. The inland populations of some of these marine birds is considered unusual. Peregrine falcons, gyrfalcons, and ospreys are seen in the area. An osprey nest is located adjacent to the road on a power pole where the power line crosses a small creek. Various passerine birds are also present. Savannah sparrows and lapland longspurs frequent the tundra and shrubs. Thrushes, warblers, other sparrows and robins prefer the spruce-hardwood forests. Only a few species, including white-tailed, willow and rock ptarmigan, spruce grouse, and ravens, spend their winters here. The majority of the other birds move south in the fall. Various observers have reported 135 species in the area (DCRA Community Profile).

Current knowledge indicates that there is no known occurrence of sensitive wildlife populations and use areas in the project area.

G. Subsistence

Subsistence information on the two communities has been gathered by ADF&G Subsistence Division and entered into the Community Profile Database. The database includes information on 187 communities throughout Alaska. New information has been collected by the Division as part of its on-going research program and put into the database. Communities are visited and information gathered as staff and budget permit. The information presented in Table 3 is for two separate years, 1992 for Iliamna and 1983 for Nondalton. Both communities use many kinds of salmon, land mammals, birds and wild plants. The data shows the importance of subsistence to area residents.

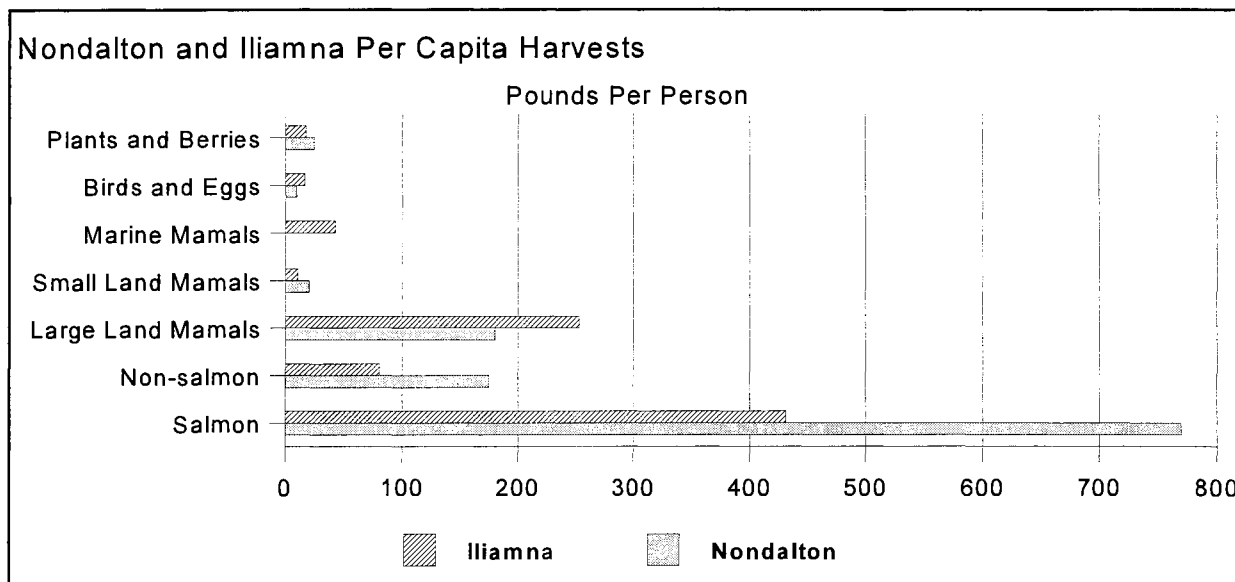


Table 3. Nondalton and Iliamna Per Capita Harvests (Iliamna - 1992 and Nondalton - 1983)

Source: ADF&G

Iliamna

Most Natives and an increasing number of non-Natives in Iliamna depend to a varying extent on subsistence hunting and fishing. Subsistence is an important part of many people's lifestyle and native cultural heritage, as well as an important source of food. Red and chum salmon are caught in the summer. Freshwater fish, rabbit and porcupine are taken year-round. Moose, caribou, bear, ptarmigan, ducks, and geese are hunted in season. Seals are taken occasionally from Iliamna Lake. In the fall, residents pick blackberries, blueberries, cranberries, salmonberries, and raspberries. Wild celery, spinach, and onions are gathered in the spring. In 1992, ADF&G interviewed 23 out of 30 households and results indicated that all households used subsistence resources and over 96 percent harvested fish and wildlife (see Table 3). Iliamna residents harvested, on average, 848 pounds of subsistence resources per person. Salmon and large land mammals made up 81 percent of the total subsistence harvest (82,915 pounds). Little subsistence use for the residents of Iliamna occurs along the Iliamna-Nondalton roadway.

Nondalton

People in Nondalton heavily depend on subsistence hunting and fishing. Subsistence is an important part of the Nondalton people's life style and native cultural heritage, as well as a vital food source food. Red salmon are caught in the summer and freshwater fish, rabbit, and porcupine are taken year-round. Moose, caribou, bear, ptarmigan, ducks and geese are hunted. In the late summer and fall, residents pick blueberries, blackberries, and cranberries. Wild onions are gathered in the summer. Information gathered by ADF&G in 1983 when they interviewed 21 out of 54 households, indicated that all households used

subsistence resources (see Table 3). Only three of the sampled households indicated that they have income from employment. Fish, both salmon and non-salmon made up 80 percent of the subsistence resources used. Large land mammals made up another 17 percent of the total subsistence take. Nondalton residents harvested an average of 1,176 pounds of subsistence resources per person in this 1983 survey. Most subsistence use for the people of Nondalton does not occur along the existing Iliamna-Nondalton roadway.

H. Private Property Values

Since the Lake and Peninsula Borough does not collect a property tax, local assessment data is not available. Assessment data is available for the borough as a whole from the state assessor's office, but not for communities within the borough. The Alaska Housing Finance Corporation, State Assessor and the Alaska Department of Labor do not record any data for the individual communities in the Lake and Peninsula Borough. Only anecdotal evidence is available about land and house sales in the general area. Sales are infrequent but several have occurred in the last few years. Most people indicated that land was very expensive in the area. Waterfront property has the highest value, selling for \$.75 to \$1.00 per square foot and up. Residential land on a maintained public road sells for about \$100 per foot of frontage. Property that may have a commercial use varies according to the location, size and desirability. Land for residential purposes at Keyes Point, a large subdivision on Lake Clark, sells for around \$10,000 an acre depending on allowed uses and location.

I. Public Safety and Fire Protection

The case loads and type of cases are similar for both Iliamna and Nondalton. Most of the activity involves accidents and misdemeanors. Serious crime is rare and is investigated by the State Troopers. Iliamna has an Alaska State Trooper stationed in the village during the summer months. The Trooper is responsible for the larger regional area. Two Village Protection and Safety Officers (VPSO) are in Newhalen and also serve Iliamna. A local volunteer fire department has several people trained to fight fires. The state ADOT&PF has fire fighting and emergency vehicles required by FAA regulations located on the airport property. The Iliamna and Newhalen communities work together in response to local fires. Nondalton has a VPSO and facilities located in the city building. The VPSO cooperates with the Iliamna staff with assistance and investigations. A local volunteer fire department uses equipment and a truck stored at the city building.

J. Emergency Medical Services

Iliamna has two community health aides (two others are located in nearby Newhalen). The community clinic is located near the center of town near the lodges and store. In Nondalton health care is provided by a health aide at the city building in a small clinic. Funding for health services is provided by the Alaska Area Native Health Service through the Bristol Bay Area Health Corporation. Both clinics are in good condition and have small but adequate offices and examining rooms. The community health aides

and alternate aides provide primary care, preventive care, vision screening, health education, and disease control. They also administer medicine and are trained to provide pre-natal and well baby care. Additional care is provided by a physician who visits twice a year, a public health nurse who comes three or four times per year, and a dentist and sanitarian who visit annually. Native patients who require further treatment, including emergencies or those requiring surgery or the care of a specialist, are taken by scheduled or chartered flight to the Alaska Native Medical Center in Anchorage. Non-natives go to other Anchorage clinics and hospitals. Many life-saving procedures, such as intravenous injection, are beyond the health aid level. Some of the work load involves emergency medical care for serious injury or illness. The successful provision of these services is hampered by the lack of an all-weather airport and limited year-round surface transportation at Nondalton. Patients needing to be medivaced to Anchorage are sometimes delayed or suffer additional trauma in transportation from Nondalton to Iliamna.

K. Education

Iliamna

There are no schools in Iliamna. The 19 school-aged children are bused daily to the elementary and high school in Newhalen. The enrollment at Newhalen is 10 pre-school and 83 kindergarten through 12th grade students. Enrollment over the last five years has fluctuated within a normal range for the area and is characterized as stable by school district staff. The school has a principal and nine full-time teachers. Fifteen part-time people work as non-teaching staff (cooks, maintenance man, custodian) to keep the school running. There are other employees, such as a special education teacher, a librarian, and the area principal that serve school sites in Nondalton, Port Alsworth, Pedro Bay, Kokhanok, and Igiugig. A tutor works five nights a week to help school children and adults who are trying to get their GED's. The Iliamna Area Office for the Lake and Peninsula School District is located at the airport in Iliamna. A supervised evening recreational program for both children and adults is offered by the school in Newhalen. The school is also used for evening meetings and sports events by residents of Iliamna and Newhalen. The Lake and Peninsula School District estimated expenditures for the school site that serves both Iliamna and Newhalen to be about \$726,600 in 1993.

Nondalton

The Lake and Peninsula School District, based in King Salmon operates a combined elementary/high school in Nondalton. In the 1995-96 school year, seven teachers taught 67 students in kindergarten through 12. Eleven pre-schoolers were enrolled last school year. Enrollment over the last five years has fluctuated within a normal range for the area and is characterized as stable by school district staff. Other part-time employees include eleven more people. Four circuit riding staff, the school superintendent, assistant superintendent, director of federal projects, administrative assistant, facilities coordinator, and director of maintenance travel to the school from King Salmon. The school was built in 1978 and is in good condition. The school is a two story structure with six classrooms, a kitchen, library, gymnasium, principal's office, and a large multi-purpose room. A separate shop building was built in 1976 and

enlarged in 1982. Teacher's living quarters (a duplex, small house, and trailer) are adjacent to the school. The school offers various athletic programs, including Native Olympics, gymnastics, and classes for gifted children. All the shared circuit riding staff also serve the Newhalen/Iliamna school.

L. Transportation Facilities

The existing transportation systems are multi-modal. Some freight coming into Nondalton is flown to Iliamna, trucked to the landing site on the Newhalen River and barged to Nondalton. Material that cannot be shipped by plane is usually barged to the area by one of two routes. The first route is through the Aleutians to Bristol Bay and up the Kvichak River to Iliamna Lake. Another route in Cook Inlet uses a primitive road from Williams Port at the head of Iliamna Bay in Cook Inlet to Pile Bay on the southeast shore of Iliamna Lake. Freight is then barged to Iliamna. The switching from one mode to another and back again contributes to the cost of goods and construction in the region.

Travel to or from the study area is by plane or boat. Overland travel between Iliamna and Nondalton is not possible because of the lack of a bridge over the Newhalen River. Overland winter travel between these two communities is possible on the frozen Newhalen River and across Sixmile Lake. Hard to detect thin spots in the ice on the Newhalen River vary from day to day during the winter making ice travel very hazardous. Two snowmachine riders drowned during the winter of 1995 after going through the ice near the mouth of the river near Nondalton. Travel across frozen Lake Clark or Iliamna Lake is also possible but not very common due to the high risk involved. Snowmachine and four-wheeler travel is common year-round, especially in Nondalton where larger vehicles are few. The existing winter roadway to the proposed bridge site is used by residents traveling between the two communities. The steep hill on the east side of the river at the road end prevents the hauling of heavy freight or supplies. Most heavy or bulky items are transported by car or truck to the landing site on the old road, transferred to a boat or small barge, taken upstream to Nondalton and off-loaded to another vehicle and driven to the final destination.

Iliamna

Iliamna has regularly scheduled air service provided by ERA Aviation (Anchorage International) and Birchwood Air (Merrill Field). The locally based air taxi is Iliamna Air. The airport at Iliamna is quite large and a relic of federal emergency development during World War II. The main runway is 4,000 feet long and 150 feet wide. The crosswind runway is 3,000 feet long and 100 feet wide. Both runways are gravel. Pike Lake within the airport boundary, serves as a float or skiplane base. The airport is the only one in the region with an instrument approach system. Iliamna airport is a certificated airport and the major hub for the region. The airport receives mail, freight and regularly scheduled passenger flights. Iliamna airport is a commercial aviation service level airport (between 2,500 and 10,000 enplanements). For calendar year 1993 through the end of fiscal year 1995 the Iliamna airport is listed as having 6,230 enplanements.

The local public road system in Iliamna is maintained by the state. The equipment used for road maintenance is the same equipment used for the airport runways. The airport runways, safety areas and ramp receive priority. About 56 lane miles of road are graded by a single grader. Most of the roads in Iliamna were resurfaced or built at least twenty years ago. No accurate count of vehicles is available for Iliamna. A 1983 estimate was 60 cars, trucks and vans. Many vehicles are seasonal (used for construction or associated with the lodges) coming in for the summer season and leaving in the fall. Four-wheelers and snowmachines are very common and used as a secondary method of transportation.

Nondalton

Nondalton is primarily accessible by air and water. Iliamna Air Taxi provides scheduled mail service on Monday, Wednesday, and Friday and also provides charter flights. Ryan Air Service, Peninsula Airways (based in King Salmon), Talarik Creek Air Taxi (based in Iliamna and Anchorage) and Birchwood Air Service charter flights to and from Nondalton. The Nondalton airport was reconstructed in 1994-95 by the state. It is designed to accommodate 95 percent of the expected traffic. The main runway 20/02 is 2,800 feet long by 100 feet wide gravel surfaced. The airport runway length is limited due to requirements for a stream diversion for fish passage and to avoid terrain obstruction within the approach slope. The runway at Nondalton is generally used only by single and light twin engine aircraft. The Nondalton airport is a general aviation service level airport (less than 2,500 enplanements). Nondalton airport is listed as having 918 enplanements during the period of calendar year 1993 through the end of the fiscal year 1995.

Food, some fuel and other necessities are transported to Nondalton in two ways. Freight is barged from Bristol Bay up the Kvichak River across Iliamna Lake to Iliamna. The goods are then taken by road to a landing on the Newhalen River where the goods are transferred to another barge that travels to Nondalton. Alternative access is to have freight flown in to Iliamna. Individuals often haul fuel in barrels or plastic containers by truck and boat from Iliamna. The local road system in Nondalton is limited. The ADOT&PF contracts with the city to maintain roads in Nondalton. The main road extends from the airport to a material site southwest of the city center. No current accurate count is available for the numbers of vehicles or licensed drivers in Nondalton. Local officials estimate the number of cars and trucks (mostly trucks) in the city is about 12 to 15. This compares with a 1983 estimate of 16. Snowmachines and four-wheelers are very common and usually the primary mode of transport with most households owning at least one.

M. Proposed Transportation Projects

Despite the remoteness of Lake Clark and Iliamna Lake communities, and the rugged terrain in some areas, planning documents have considered a number of transportation corridors within the region for more than 20 years. Past planning activities have primarily considered potential needs for pipelines or roads to transport natural resources (minerals, oil and gas) to tidewater or from Bristol Bay to the Pacific Ocean side of the Alaska Peninsula. This section summarizes past planning considerations for potential transportation corridors in the region

During the 1970's, the BLM and Joint Federal-State Land Use Planning Commission for Alaska identified potential transportation corridors which might be used for resource development activities within the L&PB:

1. Port Alsworth

An 80-mile road and slurry pipeline identified for potential use would extend from Port Alsworth south to Iliamna, eastward to Pile Bay, then up the Iliamna River across the Chigmit Mountains to Iniskin Bay. The primary purpose for this corridor would be to provide a transportation route for development and production of copper reserves near Port Alsworth. The road would be able to handle heavy ore-carrying trucks, and a slurry pipeline would provide an additional means to transport copper or other minerals to tidewater.

2. Bristol Bay Pipeline

This oil and/or natural gas pipeline corridor would provide for transportation of hydrocarbons produced in the Bristol Bay area or from Western Alaska to a marine terminal site on the Pacific Ocean side of the Borough. Both pipeline route alternatives would initiate from the Dillingham area. Alternative (1) starts at Egegik Bay and crosses the Alaska Peninsula south of Lake Becharof to a potential port site at Kanatak. Alternative (2) proceeds south from Dillingham beneath Bristol Bay to Strogonof Point, then across the Alaska Peninsula to a potential marine terminal in the Chignik area.

3. Alaska Peninsula Roadway and Utility Corridor

This 500 mile multi-purpose corridor would be routed the length of the Alaska Peninsula. Starting at Igugig on the Kvichak River in the southwest corner of Iliamna Lake, the corridor would run southwesterly to Pavlof Bay with lateral extensions from the main corridor to potential all-weather port sites at Kanatak, Chignik, and Pavlof Bay. This corridor was envisioned as the final link in a pipeline network stretching from Northwest and Western Alaska to ports on the Pacific Ocean. While the corridor would be designed for pipelines and power transmission lines, three road segments would connect Iliamna to Kanatak Port, Chignik Bay to Port Heiden, and Pavlof Bay north to the Bering Sea.

4. Iliamna Lake Corridor

The currently used water transport network on the Kvichak River and Iliamna Lake is recognized as one of the transportation corridors. Future use by over-surface air cushioned vehicles was identified as a possible transportation method for this corridor.

Bristol Bay Regional Management Plan and Final Environmental Impact Statement

An analysis of the transportation potential of the Bristol Bay region was contained in the 1985 Bristol Bay Regional Management Plan and Final Environmental Impact Statement prepared by the U.S. Fish & Wildlife Service and the Alaska Land Use Council. The Alaska Department of Natural Resources completed a similar planning document for state lands (Bristol Bay Area Plan for State Lands). These plans identified two specific trans-peninsula routes for transporting oil and gas from hypothetical lease sale areas on the north side of the Alaska Peninsula or the Bering Sea to deep-water ports on the Pacific Ocean.

1. Port Heiden to Kujulik Bay

From Port Heiden, this corridor would lead southeast outside the Aniakchak National Preserve, up the Meshik River Valley, and south to Kujulik Bay. The port site would be on the north side of Kujulik Bay.

2. Pilot Point to Wide Bay

This corridor would begin near Pilot Point on Ugashik Bay and run southeast, crossing the Ugashik River near Ugashik. Continuing on the north side of the Dog Salmon River, the corridor would pass Lone Hill to a port site at Wide Bay.

Bristol Bay CRSA Coastal Management Program

The Bristol Bay Coastal Resource Service Area (BBCRSA) coastal management program which addressed the lands in the L&PB prior to Borough formation also discussed potential long distance transportation corridors in the region. Four potential cross peninsula routes were identified in the BBCRSA planning documents:

1. King Salmon to Puale Bay
2. Egegik Bay to Portage Bay
3. Pilot Point to Wide Bay
4. Port Heiden to Kujulik Bay or Aniakchak Bay

Lake and Peninsula Borough Comprehensive Plan

Two potential road projects which have been considered by the L&PB include a route from Chignik Lagoon to Chignik, and completion of the pioneer road between Nondalton and the Newhalen-Iliamna area. Future development of the Cominco Pebble Copper mine project near Nondalton would necessitate construction of an extensive road system from the mine site to tidewater for delivery of construction materials, support of mine operations (fuel and supplies), and delivery of ore or concentrate to a shipment point (see figure 3).

N. Commercial Activities

The regional cash economy is based primarily in commercial fishing, guide and lodge operations and service jobs. The economy is very seasonal with most "pay check" employment in the short summer season. In 1990, the U.S. Census indicated that in Iliamna the average yearly employment per adult is about 36 weeks. In Nondalton the average per adult is only about eight weeks. Traditionally many people in the region work in the Bristol Bay fisheries. The herring season begins in early May. The salmon season usually peaks from July until mid-August. The guide and lodge seasons are longer, usually beginning in late May and lasting until November. Only a few local residents are hired by the lodges. Most lodge employees come from outside the region or state. The service sector includes government, the electric cooperative and school district employment. This is the biggest sector for year-round employment and income from wages. Several attempts have been made in the recent past to diversify and strengthen the local economy. A doll factory was established in Nondalton in the 1980's but did not prosper. The local economy is very seasonal, very dependent on subsistence and, as with many areas in rural Alaska, dependent on cash from transfer payments.

Transportation Costs

This area of Alaska is at the end of the transportation pipeline for goods. The cost of supplies in the area is related to the cost of transportation. Many articles, especially food items, that qualify for shipping under U.S. Postal Service regulations, are shipped via "by-pass mail" by both commercial users and private individuals. The following market basket check, from June 8, 1996, demonstrates the price difference for food items and fuel between Iliamna and Nondalton. The store in Iliamna is an independent supplier while the Nondalton store is affiliated with the Alaska Commercial Company.

Table 4. Price Comparison - From June 8, 1996

	Iliamna	Nondalton
Kellogg's Frosted Flakes 20oz.	\$5.25	\$6.85
Wonder Bread Loaf	\$2.59	\$3.15
Eggs 1 dozen	\$2.39	\$2.59
Milk 1 gallon	\$6.98	not available
Gasoline (In May 1993, fuel oil cost approximately \$1.60 a gallon and gasoline was \$1.40 gallon.)	\$2.75	\$2.85
Diesel	\$2.25	not available
Home Heating Oil	\$2.49	\$2.50

The cost difference between other items that are bulky, such as plywood sheets, or heavy, such as outboard motors, is more pronounced. A 40 horse outboard motor costs \$85 to get from Anchorage to

Iliamna and \$185 more to be shipped to Nondalton. Plywood sheets (4 by 8 feet) are commonly cut into four smaller sections and mailed into Nondalton.

The common route for goods is to be flown into Iliamna, trucked to the old landing site on the Newhalen River and transferred to a small boat or barge to be transported up river. After landing at Nondalton, goods are transferred to a truck or four-wheeler to the final site. During mid-winter it is possible to drive across the river and Sixmile Lake on the ice. At break-up or freeze-up transportation becomes hazardous or impossible.

Iliamna

In 1990 there were 34 salmon permit (gill, set, seine) holders in Iliamna. By 1994 the number had dropped to 22. Eleven Iliamna/Newhalen permit holders fished the Bristol Bay Salmon Drift Gill Net fishery, ten fished the Bristol Bay Set Net fishery and one fished the Lower Yukon Drift/Set Net fishery. The total gross value of their catch in 1994 was \$920,906. Two people from Newhalen fished the Bristol Bay Salmon Drift Gill Net fishery in 1994. There are eight lodges located in the community. The small businesses are beginning to make an impact on the local economy. The Airport Store, Gram's Cafe and several small bed and breakfast establishments are signs of an expanding and diversifying economy. Payroll jobs are more common than in Nondalton and the road connection to the city of Newhalen is an additional spur to the economy.

Nondalton

In 1994 there were 13 salmon permit (gill, set, seine) holders in Nondalton, about double the number in 1982. Fishing is an important source of income in Nondalton. The 13 permit holders fished in two different fishery areas in the Bristol Bay Salmon Drift Gill Net fishery; Naknek and Egigik. The total gross value of their catch in 1994 was \$450,993. Additional residents crew on boats each season. Most fishermen leave the village in mid-June for the red salmon run and return at the end of July. Most fishing boats are kept at canneries at Naknek and elsewhere. While the Bristol Bay red run is typically the largest in the world, there have been relatively poor years particularly in the early 1970's. The Bristol Bay runs during the last several years have been at record levels. Another source of summer employment is fire fighting. The BLM usually contracts one or two local fire fighting crews of sixteen people each summer. The city employs a clerk, a maintenance man for the water and sewer systems, and other people as needed. The Nondalton Knichek Co-op Store, Inc. has three full-time employees. The Nondalton Native Corporation sells fuel in Iliamna and operates Sixmile Lake Enterprises, a small store and recreation hall in Nondalton. The Newhalen River Lodge which caters to fishermen and hunters, has a staff of five people including one full-time local person and as many as six locals on a part-time basis. The U.S. Postal Service employs one person. Economically Nondalton is much less diverse and active than Iliamna.

O. Tourism and Recreation

Tourism in Alaska is an active and growing segment of the economy. Summer visitation to Alaska has been increasing at about 8 percent per year. This means that the number of tourists coming to Alaska doubles every nine years. The dominant aspect of tourism in the study area is the system of lodges that provides services to access the world class fishery of the upper Bristol Bay drainages and the Lake Clark and Iliamna Lake system. This type of tourism is, historically, high value/low volume; small numbers paying large sums for world class fishing and hunting.

Lodges

The first lodge opened in Iliamna in the 1930's. A second lodge was built in the 1950's. Several new lodges have been built in Iliamna in recent years as lots were made available from the Baptist Church. A total of eight lodges are located in Iliamna and others are scattered on the shore of Iliamna Lake. Nondalton has two lodges. Several other lodges are located outside Nondalton on Lake Clark. Port Alsworth has a concentration of lodges. Many of the lodges are long established, family run enterprises with a clientele that returns year after year. A few lodges are tied into larger operations with facilities elsewhere in Alaska or linked to air-taxi operations. The area lodges have a reputation for offering access to world class fishing and hunting. Rainbow trout is the primary target for many of the clients but salmon and fresh water fish are also taken. Fall hunting concentrates on the big four; moose, brown bear, sheep and caribou. The high value market/low volume lodge dominates the existing local market.

Mass market tourism enterprises (such as Princess Tours) are not represented by facilities in the area. No data on overall tourism is available for the specific study area in this report. However, data for the larger region of southwest Alaska and Alaska in general is available. Two reports have been done in the last ten years that focused on the role of tourism in the larger region. The Nushagak-Mulchatna Commercial Recreation Study (NMCRS) was produced in 1986. A more recent study, Bristol Bay Tourism Development Regional Strategies and Investment Opportunities (BBTD), in 1994 for Bristol Bay Native Corporation amplified many of the findings and concerns in the earlier study. The latest detailed survey and information from the state Division of Tourism was completed in 1993. Compared to the rest of the state, southwest Alaska (which includes Kodiak Island) has the lowest visitation rate of any area. Only six percent of all visitors to Alaska visit Southwest Alaska; about 47,000 visitors in 1993. Vacation or pleasure visitation was four percent much less; in real numbers -- 25,600.

The NMCRS identified a total of 127 air taxis, guides, and lodge operators in the Nushagak-Mulchatna River drainages during 1985, with an estimated income of nearly \$25 million from 7,700 clients. Average gross incomes were estimated: air taxis \$195,000; guides \$56,000; and lodges \$355,000. The study noted that operations generated significant seasonal employment. The total estimated maximum monthly employment was: air taxis 152; guides 60; and lodges 231. A survey done for the report indicated that operators were concerned about access restrictions on state, federal, and private lands and that the quality of experience and overcrowding have become issues.

The BBTD presented a comprehensive overview of the entire Bristol Bay area focusing on the native corporation lands and potential for tourism development. The report noted that the high market tourism industry in the area supports many businesses but misses the bulk of the tourist market and related tourism jobs and profits. The BBTD noted tourism in the study area is changing. Recently, the fastest growing regional tourist activities are lower cost, shorter trips such as unguided fishing. Growth of tourism in the Bristol Bay area, about 4 percent between 1989 to 1993, has not kept pace with the statewide growth in tourism. The trend in the Bristol Bay area is toward a higher volume and the middle-market type of tourist. The increase in the numbers of independent travelers is encouraging the development of support services in the area. Another related trend is the rise of the non-consumptive visitor or eco-tourist. One lodge at Port Alsworth actively markets this type of experience. The new tie-down area at the Iliamna airport, increased use by Anchorage based floatplane fly-out operators and increased awareness of the accessibility of the study area from Anchorage and southcentral Alaska have contributed to the change in the tourist mix.

Fishing

The ADF&G, Division of Sportfish estimates sportfishing angler days. The study area is within the Kvichak River district of the southcentral Sportfish Management Area. The Kvichak district includes Lake Clark-Iliamna Lake and the Newhalen River, but not the Mulchatna or Nushagak rivers. The angler days for the district are:

Table 5. Sport Fishing Effort

Year	1984	1989	1990	1991	1992	1993	1994
Angler days	18,384	17,854	30,857	28,553	34,876	41,697	39,141

The Newhalen River is a very popular rainbow trout, red salmon and grayling sport fishery. The sport fishing growth rate in the area is estimated at 7 to 11 percent by ADF&G. The season opens, after a spring closure for spawning, about the first week in June. The ADF&G area sport fish biologist in Dillingham estimates the sport fish effort on the Newhalen River to be about 6,000 angler days. Most of this effort (80%) is directed toward red salmon (sockeye) and concentrated in the lower stretch of the river near Iliamna. Most of the remaining effort is targeted to rainbow and grayling. This fishery is more evenly spread along the river than the sockeye fishery, but is more common above the Newhalen River falls to the mouth of the river at the end of Sixmile Lake. The ADF&G office in Dillingham characterizes the Newhalen River rainbow fishery as underutilized. The existing road provides three commonly used sport fishing access points; the end of the road on the south side of the Newhalen River, Bear Creek and the old landing site.

The percentage of fishing effort in the Kvichak district compared to the Bristol Bay area as a whole has dropped from 72 percent of the total effort in the 1980's to 58 percent between 1990 and 1994. In 1994 (the last complete data year for the ADF&G harvest and catch reports on individual rivers) the

Newhalen River is indicated as having 5,790 angler days and the Tazimina River as having 627 angler days. The Newhalen River averaged 5,207 angler days between 1987 and 1991.

Newhalen River

The Newhalen River offers access to abundant runs of salmon and near world class trout fishing. Many lodges and local people access the river at the old landing site north of the airport. Power boats and rafts are popular on the river. Rafters sometimes float the river to a take out at Bear Creek north of the airport and avoid the lower river rapids. The river is fished heavily from the shore near the airport where access has been provided by ADF&G. The scenic nature of the Newhalen River is often mentioned as part of the total experience along with the fishing on the river. The Newhalen River has not been proposed for nor received any special classification under the federal Wild and Scenic Rivers Act.

Tazimina River

The Tazimina River is within the Lake Clark National Preserve and empties into Sixmile Lake about one mile from the mouth of the Newhalen River. This is the only feature of the Preserve near the study area that has an established reputation for recreational use. The Tazimina River offers world class rainbow fishing. The river is easily accessed by boat from Nondalton. Many users fly in to Sixmile Lake and transfer to a boat to get to the river. Some drop-off floatplane access is available on the river. Jet boats operate on the Tazimina from near Nondalton up river to a high falls on the river. The upper reach of the river above the falls is the site of the Tazimina Hydro power project.

The current ADF&G sport fishing regulations reflect a conservative management approach which prohibits use of helicopters to access remote areas, requires use of artificial lures only, allows no summer fishing for rainbows in the Tazimina, and allows only one rainbow trout per day during the summer sport fishing season. Although the winter season allows harvest of five rainbow trout per day, the winter weather is the controlling factor in limiting the participants in this sport fishery. The following is a summary of the current sport fishing regulations applicable to the project area;

Kvichak River Drainage (to include all drainages flowing into Iliamna Lake and Sixmile Lake, excluding Lake Clark and its tributaries above Sixmile Lake) - Drainage wide methods and means regulations:

- o The use of helicopters for transporting anglers and sport-caught fish is prohibited.
- o Only un-baited, single-hook artificial lures may be used year-round.

Drainage-wide bag and possession regulations:

- o Rainbow trout may not be possessed or retained from June 8 through October 31 in the Tazimina River one mile upstream from its mouth in Sixmile Lake to the falls.

- o Rainbow trout in the remainder of the project area - June 8 through October 31, one per day, one in possession; November 1 through April 9, five per day, five in possession, only one over 20 inches.
- o King salmon throughout project area - June 8 through April 9, three per day, three in possession, only two over 28 inches.
- o Salmon other than king salmon throughout project area - June 8 through April 9, five per day, five in possession, no size restrictions.
- o Arctic Char/Dolly Varden throughout project area - June 8 through April 9, ten per day, ten in possession, no size restrictions.

Hunting

The study area is within ADF&G Game Management Unit (GMU) 9B. The area supports a healthy population of big game animals (ADF&G, Dillingham). During the spring and summer, brown bears concentrate along salmon streams in the area. They move to coastal and sub-alpine areas after emerging from their dens in April or May and return to higher altitudes for berries in late summer. They enter their dens on the upper slopes in early winter. In summer, moose are dispersed throughout the region mostly in high, well-drained areas of willow and alder and along rivers where forage is good. During fall and winter, the animals descend from higher altitudes in search of food. Moose are plentiful in the area and hunted both for sport and subsistence. Many moose taken for subsistence are unreported. The large Mulchatna caribou herd ranges over a large area which includes the study area. The caribou movements are unpredictable, but enough individual caribou are in the general area to supply both subsistence and recreational hunters.

Table 6. Hunter Success - Game Management Unit 9B

Game →	Moose				Brown Bear	
	9B		Newhalen River		9B	Newhalen River
Area →	Successful	Unsuccessful	Successful	Unsuccessful	Successful	Successful
Year	57	109	3	3	28	0
1991	60	137	1	2	7	0
1992	66	129	2	1	29	2
1993	87	142	4	7	7	0
1994	51	92	0	4	40	0
1995						

Source: ADF&G

Table 7. Caribou Hunting Effort - Game Management Unit 9B

Year	Hunters	Hunter Days
1990-91	482	2,108
1991-92	510	2,070
1992-93	553	2,281
1993-94	610	2,698
1994-95	704	3,064

Source: ADF&G

Sport hunting statistics for the study area are meager. For the period from 1991 through 1996 two brown bear were reported taken in the Newhalen River drainage. One of the two brown bear was listed as having been taken using a highway vehicle (highway vehicle includes car, trucks and ATV). For the period from 1991 through 1996 five moose were taken in the Newhalen River drainage by aircraft. Three of these moose were taken by non-resident Alaskan hunters and two by out of state hunters. Four more moose were reported taken by use of boats, two by study area residents and two by out of state hunters. No moose were reported to be taken in the Newhalen River drainage using highway vehicles.

Lake Clark National Park

Lake Clark National Park has experienced fluctuations in visitation, perhaps due to different counting or reporting methods, ranging from 4,199 to 21,652 over the last four years. The level of visitor use in the Park is difficult to estimate and access to most areas of the Park (usually by floatplane) is difficult to track. The highest use area of the Park is the northern lakes region (Twin Lakes, Turquoise Lake). A recent trend noted by Park personnel is the use of jet boats to access the lower Tazimina River (within the National Preserve area). Five years ago only one lodge (located in Nondalton) used jet boats. This method of access has grown and now most lodges in the study area use jet boats in the Tazimina River.

P. Communications

Iliamna

Interior Telephone Company provides local telephone service to Iliamna as part of a system that also serves Newhalen. There are approximately 100 residential telephone hook-ups in Iliamna. The system, which has a total of 125 hook-ups, has the capacity to expand to 400 lines if necessary. Long distance service is provided by ALASCOM, Inc. through a satellite earth station located in Iliamna. Internet access is available to individuals. Two-way radios are used extensively to supplement the local telephone system and provide "cell phone" like mobile communications. The community receives both the state's educational and commercial television channels via satellite. Nearly everyone in the village has a

television set and reception is good. People can listen to radio stations from Homer (public radio), Dillingham, and Anchorage. Mail is delivered by airplane three times a week in winter and five times a week in summer. Several residents subscribe to the Anchorage newspapers through the mail.

Nondalton

PTI Communication provides local telephone service to Nondalton. There are 94 local hookups. Long distance telephone service is provided by ALASCOM, Inc. which operates a satellite earth station near the old school site. The school and the health clinic have single side band radios for long distance radio communications. In June, 1982, Nondalton began receiving a commercial television station and an educational station by satellite (RATNet). Nondalton receives radio stations from Dillingham and Anchorage. Weather permitting, mail is delivered three times a week by Iliamna Air Taxi. Several residents receive Anchorage newspapers through the mail. An Internet provider is scheduled to be made available by 1997.

Q. Utilities and Fuel

The Iliamna-Newhalen Electrical Co-op (INNEC) was formed in 1977 to provide power to the residents of Iliamna, Nondalton, and Newhalen. INNEC has five employees. One 600 Kw and three 330 Kw generators serve the three villages from a central generating facility in Newhalen. The FAA 125 Kw generator at Iliamna serves as a back-up system. A few individuals operate small private generators. The INNEC transmission line runs from the diesel plant in Newhalen adjacent to the existing Iliamna-Nondalton Road to a point where it diverges to the north to Fish Village, at which point it crosses Sixmile Lake to Nondalton. During the past few years a tremendous amount of vehicular traffic has been crossing the transmission line easement to access Fish Village. The area at the bridge site on the south side of the Newhalen is characterized by a very steep bluff which makes river access very difficult. It is easier to drive along the power line easement to a much better site for accessing the river or Sixmile Lake. INNEC is concerned about this situation as it poses a direct threat to the integrity of the transmission line. A broken underground line in this area would interrupt power to Nondalton until it could be repaired. The line which runs on the bed of Sixmile Lake is also subject to ice scour and breakage. Electric service in Iliamna is via buried cable. Service is provided to eight lodges, the FAA building, state buildings, post office, the trading company, and 17 homes. INNEC is currently pursuing development of a hydroelectric project at the Tazimina Falls (scheduled for completion in late 1997). The Tazimina Hydro power project is a run-of-river project capable of generating 824 Kw. The project uses a diversion tunnel at the top of an existing falls on the river to provide water to turbines at the base of the falls. The project will supply electric power to the INNEC communities at a stable cost. The project site is located approximately seven road miles east of milepost 9.0 on the Iliamna-Nondalton Road. General construction activities began early in the summer of 1996. After the Tazimina Falls project is operational, INNEC will require daily access to the hydroelectric facility for maintenance purposes.

Fuel oil is the primary heat source for the villages. Moody's Barge Service, out of Naknek, and Levelock Barge Company deliver fuel oil and gasoline five or six times each fall. Moody's operates several gas pumps in Iliamna and a set in Nondalton. Major storage facilities are at the INNEC building and the Iliamna airport apron. In the winter fuel is flown into Nondalton and picked up by a local delivery service for delivery to individual homes. The new airport at Nondalton is too short to safely operate aircraft with a capacity of over 1,000 gallons. The delivery of small amounts of fuel oil by airplane significantly increases the cost of the fuel. A few people have switched over to propane gas for cooking and space heating. Lodges are common consumers of propane for cooking and water heating during their operating season. Propane tanks are transported via barge and boat to remote sites and to Nondalton. Some homes have supplemental wood stoves for heat. Heating with wood is more common in Nondalton where firewood is more easily available than Iliamna where the firewood supply is limited.

Energy costs for heating and transportation consume a large portion of the study area residents' cash income. The cheapest way to import petroleum fuels is by barge which comes up the Kvichak River. Low water levels restrict the ability to deliver fuel by barge to inland communities. The low water levels of 1996 have left several communities without adequate fuel supplies. In Nondalton the limitations of the airport mean that if fuel comes in by air it must be delivered in small quantities. The high cost of air transportation of fuel in small aircraft threatens the economic stability of the area. The large Iliamna airport allows the use of large fully loaded air fuel tankers.

R. Cominco Mine

Cominco Alaska, Inc., a North American firm based in Canada, has plans for the possible development of a copper mine near Nondalton. The company has conducted operations in Alaska since 1974. The Pebble Copper deposit is located about two miles north of Frying Pan Lake on the Iliamna 1/250,000 USGS quadrangle map in the central part of section 21, T3S, R25W, situated approximately 18 miles northwest of Iliamna. Cominco has 752 state mining claims at the Pebble Copper mine site on 28,000 acres of state land. The Pebble Copper deposit is located between the headwaters of Upper and Lower Talarik Creek (draining south to Iliamna Lake) and the Kuktuli River (draining north to the Mulchatna River drainage system). The working mine site would likely occupy about one square mile. Cominco has filed an application with the Alaska Department of Natural Resources (ADL 534668) to convert 38 of their mining claims to an upland lease covering an area of 1,520 acres.

Cominco has estimated the presence of a copper sulfide and iron sulfide ore body of 200 million tons with a concentration of 80 pounds copper and 0.012 ounces gold per ton. The Pebble mine deposit is porphyry copper which tends to occur in clusters. Neither the concentration of the copper nor the gold are, by themselves, economically feasible to support large-scale development at the Pebble site. The combination of the two elements make the prospect a potential project. Full operation of the Pebble Copper mine could produce up to 35,000 tons of copper and 100,000 ounces of gold per year. Based on 1995 estimates, the copper and gold deposits at Pebble Copper contain about \$2.6 billion in low-grade ore. In May 1992, Cominco announced the postponement of development at the Pebble Copper site due

to project costs and current projected world prices for copper and gold; the company also increased the estimated size of the ore deposit to 500 million tons (revised to 455 million tons in 1993). Cominco has indicated that copper prices will need to be \$1.40 (1991 dollars) per pound to justify development. Exploratory drilling has revealed a mushroom-shaped deposit with the highest mineral concentration in the stem. Studies were done by Cominco in 1991 to determine the size and grade of deposit, to conduct preliminary metallurgical testing, and to initiate preliminary baseline (reconnaissance level) studies. The shape of the deposit is apparently conducive to development as an open pit mine. Large open pit mines typically handle two to three times as much overburden and sub-economic mineralized rock as actual ore processed. However, Cominco has stated that the stripping rate (ratio of overburden removal to ore extracted) is low for this project, providing a distinct economic advantage. It is estimated the mine would process 30,000 tons of rock per day. Haul trucks moving the ore from the mine pit to the concentrator facility would probably have an 85-130 ton capacity. The ore processing facility would be built near the mine to concentrate minerals using an ore crushing and froth flotation process.

Since inception of the Pebble Copper mine project, Cominco has recognized that a road would be necessary to access the mine site for construction and to deliver mineral concentrates to a tidewater port. Transportation routes initially considered included a barge route down the Kvichak River (with dredging), and a barge route across Iliamna Lake to Pile Bay with a road to Williamsport or Ursus Cove. Cominco has since focused attention on primarily two transportation options; a road east across the Newhalen River to Cook Inlet (about 80 miles), or a road to Naknek on Bristol Bay (about 140 miles). It would be necessary to construct a port at the tidewater terminus of any road option chosen. Cominco prefers the eastern access to a year-round, ice-free port on Cook Inlet. Cominco has indicated it would support limiting non-industrial access on project roadways for safety reasons and in support of local concerns. Cominco estimated that road and port site costs could range around \$120-130 million and total development costs would be \$500-800 million.

The current Cominco preferred road alignment would follow a different alignment than the existing Iliamna Newhalen road. The road would remain on the west side of the Newhalen River to just north of the Iliamna airport (about 3½ miles). Sharing of the existing road corridor would only occur between here and Iliamna airport. The Cominco industrial road would then proceed east to Cook Inlet. This road would be built to an industrial standard similar to the road servicing the Cominco Red Dog mine in the Northwest Arctic Borough. Trucks hauling ore concentrate would need substantial bridges and a durable roadway. No detailed environmental analysis or project development planning has been done for this development. Cominco's exploration office estimates that the project may begin in the next 20 to 30 years.

S. Local Regulations

The L&PB is the primary unit of government in the area. The borough is a Home-Rule borough under Alaska law. The borough has an approved coastal management plan and exercises education, planning, platting and land use controls.

Coastal Management

The coastal management plan is the primary vehicle for borough input into state and federal permits. The approved coastal management plan is in effect an amendment to the state coastal plan. All state and federal permits issued within the borough coastal area are required to be in compliance with the enforceable policies of the borough coastal management plan (see appendix C). The borough coastal boundary encompasses all lands and waters within the borough except for glaciers and perennially snow-capped mountains. The borough makes a consistency recommendation to the state coordinating agency on compliance with the coastal policies. Under coastal management the borough is regarded as the authority in the interpretation of its policies. The final consistency determination for federal and state permits is issued by the coordinating agency.

The Iliamna-Nondalton Road is within the borough coastal boundary and permits associated with the road construction may need to be reviewed for compliance with the coastal plan. The Iliamna-Nondalton Road project may be "considered a use of state concern" under the Alaska Coastal Policy Council resolution number 13. This resolution lists categories and criteria for uses of state concern. The list of State concerns includes: "Capital projects that have statewide, inter-regional and inter-district uses which impact the state's transportation system including highways, roads, trails, railroads, pipelines, airports (for land and seaplanes), the Marine Highway System (ferries, docks, piers, or terminals), boat docks, and harbors." The application of coastal program policies in making a consistency determination cannot restrict or exclude uses of state concern without addressing specific requirements of the Alaska Coastal Policy Act. Section 46.40.070(c) of the Alaska Coastal Management Act describes what must be done before the Alaska Coastal Policy Council can approve a restriction or exclusion of a use of state concern. To restrict or exclude a use of state concern the Council must find that:

1. The L&PB has consulted with and considered the views of appropriate federal, state, and regional agencies;
2. The L&PB has based such restriction or exclusion on the availability of reasonable alternative sites;
3. The L&PB has based such a restriction or exclusion on an analysis that shows that the proposed use is incompatible with the site; and
4. The restriction is not unreasonable or arbitrary.

Regardless of whether the project is considered a use of state concern the entire project will have to comply with the coastal management policies listed in Appendix C. These policies, which reference state regulations, are the bulwark of environmental protection and permitting in Alaska.

Subdivision Regulations

Chapter 9.06 of the borough code contain subdivision regulations that outline requirements for Preliminary and Final Plat, and for Right-of-Way Acquisition Plat. Conditions may be attached to approval

of a plat in order to make it consistent with the policies of the L&PB Coastal Management Plan and Comprehensive Plan. About two acres of the right-of-way for the Iliamna-Nondalton Road still needs to be acquired and would need to undergo review under this section of the borough code.

Development Permit

Chapter 9.07 of the borough code contains requirements for the borough development permit. This permit is to insure that certain development within the borough complies with locally-adopted plans and policies, including the coastal management plan. It is intended that through this permit requirement valuable natural resources, watersheds and fish habitats will be protected. A borough permit is required for any excavation, placement of fill, grading, or removal or disturbance of topsoil of more than 10,000 square feet within 100 feet of anadromous streams, tidelands, or submerged lands. Reclamation plans may be required for industrial and extractive uses, and include specific requirements. The construction of the Iliamna-Nondalton Road will require review, approval and compliance with the borough development permit requirements.

V. Secondary and Cumulative Impacts of the Alternatives

A. Key Assumptions

This section identifies several key assumptions which are used in the preparation of likely cumulative and secondary impacts from the Iliamna-Nondalton Road project. This section does not describe a status quo situation for the study area without road rehabilitation. However, road rehabilitation will affect some of the key assumptions. These effects are described in the next sections of this report. The key assumptions represent projected state-wide and national trends which will affect the study area in several important categories. The Iliamna-Nondalton Road is not connected to any other road system (except a short spur to Newhalen). The Iliamna-Nondalton Road reconstruction results in access improvement only for the study area. Access to or from the larger region or the state highway system is not affected by this project. The 20 year design life of the roadway is used as the benchmark time period. A difficulty in assessing secondary impacts from this project is that hard data, quantitative numbers, are not available for many commonly used parameters. What little data does exist is often old, anecdotal or riddled with caveats. The impacts are presented as having one of three general levels of effect; minor, moderate, or major. The impacts are assessed for two time periods. Near term impacts are those effects from the project that are expected to be evident within five to ten years. Long term impacts are those effects expected to be experienced within 20 years.

Environment

Through sound management practices, cooperation between major land owners, residents, business people, government and good fortune, the Kvichak drainage fisheries, water quality and other important environmental values will remain productive and plentiful throughout the next twenty years. Environmental laws and laws determining allocation of resources will continue to be refined and enforced to maintain the stability of the area ecosystems. The enforcement and compliance with environmental laws and regulations will be absolutely necessary to ensure that the area retains its quality while accommodating change. This is a key assumption for all impacts.

Fish and Game

Pressure is likely to increase on both fish and upland game resources. Allocation of these resources will become more problematic. As long as the important habitats necessary for wildlife production are preserved and access to these habitats is unrestricted, the availability and abundance of the areas' wildlife resources will be at or near present levels. This is essential for the continued economic well-being of the region.

State and federal fish and game management agencies will make equitable allocations and continue the strength of the areas' wildlife. The question of resource allocation is a difficult issue which cannot be answered with any certainty. An example of a success is salmon management by the State of Alaska.

The state management of this resource has been a spectacular (mostly unknown to the public) conservation achievement. In the last year of federal control, 1960, Alaska's salmon catch had plunged to a 60-year low of less than 250 million pounds of fish from a peak of 750 million pounds of fish in 1936. After 35 years of state management, salmon catches now hover around the two billion pound mark. Historic fluctuations in the abundance of fish and game, such as the low number of salmon returns to the area in 1996, will continue but fish and game resources will remain strong.

Government

Federal and state funding for programs of all types will decrease in real terms over the study period. Responsibility for programs currently funded and administered by the federal or state governments will have to be assumed by local government. Local communities, whether incorporated or not will have to find methods to finance local services, or face cutbacks commensurate with a reduction in state and federal funding.

The L&PB will become an increasingly important provider of services and regulator as state and federal government spending recedes. Local governments, both borough and city, in the study area will begin to effectively tax the study area tourism industry during the study period.

Nondalton will have to build a diverse economy that will sustain local government services. The city of Nondalton will have to find new sources of revenue and increase revenue existing sources in order to survive.

Iliamna will continue to grow as a government hub for the upper lakes region because of its proximity to the state airport. The Iliamna area will incorporate or be annexed into the city of Newhalen in order to provide adequate local services.

Economy

Economic growth is a causal factor in cumulative and secondary impacts. Expansion of the local economy to accommodate a demand for services creates new construction, increased employment, and greater consumption potential. New construction usually requires land, transportation and natural resources. Increased employment may encourage in-migration of people who will require housing, generate a demand for goods and services, and place a strain on local infrastructure. An increased flow of money to the local economy may change local consumption patterns. This change in patterns may have other consequences (i.e., second homes, more recreational boating, etc.).

Forecasting the economy over the next two decades that will affect the study area is extremely difficult. Although the exact size and nature of the economy cannot be predicted with certainty, the Iliamna and Nondalton economy should continue to diversify. The local economy is likely to become strong enough to provide opportunities for a seasonal source of employment and income for many of the study

area residents. Transfer payments will continue to be an important source of local income but a larger percentage of cash from earned wages will come into the local economy. Several national and state countervailing trends are underway with unknown outcomes. These major trends and issues include:

Federal spending both for direct employment and as pass-through funds will decrease to relatively low levels over the study period. This will lessen the amount of cash available to study area residents.

The state will have a continued state reliance on petroleum revenues, despite efforts to diversify the state's economy. Most of Alaska's unrestricted revenues (84 percent) come from petroleum related activities. These petroleum revenues will continue to account for about 80 percent of state revenues well past the year 2000. As a basic commodity, the petroleum market is subject to price swings based upon both rational supply and demand and by emotional speculation. Over the long term, energy real costs have risen about four percent per year, but the rise is usually a stair step rather than a gradual slope. The difference between 1993 and 1996 fuel prices in the study area are a good example of a step up in prices. A long-term decline in petroleum revenues to the State of Alaska can be expected and has already begun. This is critical to all areas of Alaska, including the study area, because the ability of the state to continue providing important funding for many local government services is directly linked to the amount of revenues. State agencies will have far fewer resources for everything from tourism marketing, road maintenance, enforcement of fish and game regulations, public safety, education and capital improvement projects.

The L&PB School District will be directly affected by a reduction in state funding for programs. The borough will find ways to supplement and diversify its revenue sources. The borough will continue to receive most of its income from taxes on commercial fishing. The borough school district will be able to maintain the level of educational service throughout the study period, but will utilize more circuit riding employees and sharing of facilities and equipment.

The study areas economy will remain strongly seasonal. Commercial fishing, tourism and government will continue to provide most of the employment for the area. The relative amount of cash income derived from government work and commercial fishing in the study area is likely to decline. Commercial fishing will continue to supply a seasonal cash income to study area residents, but income from this source will not rise faster than the underlying rate of inflation. Cash that does come into the local area will not have a high rate of re-circulation. The trend in the rise of small business, such as bed and breakfast operations and small stores and cafes, will strengthen the diversifying economy in the area. New and increased recreation opportunities will be offered for short-stay and lower-cost visitors.

The diversification of the Iliamna economy based on increased tourism and part-time residency will continue and help residents weather future economic downturns. Job creation and income growth will increase by a much larger percentage in Iliamna than Nondalton. The weaker Nondalton cash economy has potential for growth based on its population size and increase, but Nondalton residents will continue to have a high dependence on subsistence and a non-cash economy.

Tourism

Tourism will continue to increase in size and influence in the study area. The continuation of the southwest Alaska growth rate in Alaska resident and non-resident visitors of at least four to six percent per year is a reasonable assumption. The southwest area of Alaska, especially the Newhalen River and Lake Clark area, is an increasingly well-known and popular destination for both Anchorage-area residents and for non-Alaskan visitors. The study area is very likely to experience a higher tourism growth rate than the larger southwest Alaska region. (Sport fishing in the region is estimated by ADF&G to be increasing at seven to 11 percent per year.) Even an increase of two percent in the general rate of increase (from four to six percent) would be significant over 20 years. A four percent growth rate increases the base number by just over twice in 20 years; at six percent, the increase is over three times the base number in the same 20 years. It is likely that major mass market tourism (Westours, Princess) will enter the study area. Many visitor attractions in nearby southcentral Alaska are crowded and at or over the desired capacity. The major tour operators, attraction managers and state Division of Tourism are considering how to relieve this pressure by utilizing lesser used areas of the state, such as southwest Alaska. At some point during the study period a large tourist development 40 to 100 rooms will be established. The arrival of a sizeable tourism development will provide a boost to the area's seasonal economy.

Visitation to Lake Clark National Park and Preserve will increase at a rate equal to or somewhat greater than the sportfishing rate of increase (about 7 percent) for the region. In twenty years the Park will have four times as many visitors as it does now. The use patterns in the Park will remain essentially the same as now. The current visitation pattern is centered in the north end of the Park, in the Portage-Twin-Turquoise Lakes area. Planned National Park Service improvements to facilities and access at Port Alsworth will not occur until late in the period. Keyes Point has very good access to the Park and is assumed to have the highest probability for development connected to increased visitation at the Park. Recreational development, such as charter boat service or accommodations, based in Nondalton, will not occur during the twenty year study period due to navigability restrictions and the distance to the most visited National Park features.

The tourism market in the study area will continue to change to a mix of high-end and middle-market operations. The growth of small middle-market recreation providers in both Iliamna and Nondalton will continue but will likely be much stronger in Iliamna. Local lodges are likely to come under greater pressure and competition to provide an experience close to their high-end clients' expectations. Some local lodge operators will change their target market and move to middle-market or eco-tourism and non-consumptive clients. Other lodges will modify operations to accommodate higher volume mid-market tourism. Those tourism providers choosing to stay with the high-end market, looking for a true wilderness experience, will shift further west into the Nushagak and Mulchatna river basins. The shift in use areas will encourage high-end tourism lodges to relocate to more remote areas.

Resource Development

No major resource development projects (such as the Pebble Copper Mine) will occur in the next twenty years. Some assessment work and sampling of the Pebble Copper prospect will occur but not to a significant degree to impact the study area. Other very small scale resource developments will occur but not in the study area. The operation of small scale resource developments will generate some local employment and help induce a further change to a cash economy for the study area.

Land

The existing pattern of land ownership throughout the study area is not likely to change materially from the existing pattern. The main shift will be to local government (city and borough) ownership of land in the region. The abundance of private land for development, such as Keyes Point, will mean an increasing number of land owners. However, the general boundaries and categories (government owned, trust and private) will not change to a significant degree. While waterfront property will continue to be in demand, the large number of vacant lots, large tracts and other private waterfront lands will not be absorbed over the next twenty years. Many parcels, including native allotments, will be converted to seasonal recreation and part-time residential purposes. The Keyes Point property will likely have a large number of residences and several commercial uses by the end of the twenty year study period. The Keyes Point development is likely to become the largest summer seasonal community in the region.

Transportation

It is likely that federal highway funds will continue to be supplied at approximately the same level as now. These federal funds will be the main source for capital to address future rehabilitation and upgrading of the surface transportation system in the study area. State highway maintenance for roads in the study area are currently at a minimum level. Future reductions in the level of state maintenance are likely to have an impact on the local road system. The maintenance of roads in the study area will eventually be joined by local government. Increased economic activity and increased use of the existing roadways in the area will lead to demand for expanded and improved maintenance. The L&PB, cities and outlying areas have the ability to form special service areas to build and maintain roads.

Overland access to Iliamna or Nondalton from outside the region will not be available during the study period. Water transportation will remain an important but difficult method of transportation. Fuel, commodities and construction supplies will continue to come into the region through Bristol Bay and up the Kvichak River or via the Iliamna airport. The airport at Iliamna will continue its importance as a commercial regional airport and entry point to the area. Improvements to airport navigation will allow more reliable air transportation into Iliamna and Nondalton. The airport at Nondalton will remain at its present length and service level during the study period. The Iliamna airport will see larger increases in passenger and freight, and further improvements such as lengthening of the crosswind runway.

Utilities and Fuel

Utility expansion will keep pace with demand and not be overtaken by growth. Improvements in technology will bring better and more reliable communications, electricity, water and sewer to the area. This general trend in improvement will make the area more attractive for people to live in and for small business establishment. Fuel prices will rise slightly faster than the general rate of inflation. Fuel expenses will become a larger percentage of the cash income for the study area residents. The Tazimina Hydro project will stabilize the cost of electricity to the study area. More reliance will be placed on electricity for heating requirements, especially in Iliamna. Home heating will remain primarily by fuel oil and wood. Nondalton will continue to have more reliance on wood for heating because of nearby supplies.

B. Likely Secondary Impacts From Reconstruction

Environmental

Direct and many possible secondary and cumulative environmental impacts during reconstruction and afterwards would be ameliorated by permit stipulations and standard ADOT&PF construction practices. The reconstruction of the Iliamna-Nondalton Road would lessen degradation of the existing road and associated environmental impacts from roadway run-off and erosion. Regular maintenance after reconstruction of the road north of Alexcy Creek would lessen erosion and damage to the vegetation along the corridor. Erosion at both culvert crossings and dips in the road would be greatly reduced. The disturbance of the Newhalen River bed from heavy equipment and trucks fording the river would be eliminated.

The poor condition of the existing road is an invitation to off-road driving. Most of the damage to vegetation along the road corridor is due to off-road driving from vehicles going around muddy areas in the road (see photos 1 and 2). A new reconstructed road surface would eliminate the need to skirt around these bad sections of road. Environmental damage, such as the destruction of upland habitat, that come from off-road driving would be greatly reduced.

The potential for fuel spills into Sixmile Lake and the Newhalen River is likely to be reduced. The road reconstruction would make possible the transport of larger volumes involving fewer trips. Fewer trips should make for safer transport of the same volume. The existing process involves several different transfers between different modes of transport (land vehicle to boat to land vehicle). The presence of a road connection between the two communities would encourage the consolidation of fuel storage in a safer central facility. Fewer storage facilities should equate into safer and cheaper storage.

Air quality is usually very good in the study area and particulates are not reported to be a problem. The road reconstruction and increased traffic would increase dust in the summer but air quality would not be impaired.

The reconstruction of the Iliamna-Nondalton Road is likely to result in an overall improvement in the general environmental quality of the study area and lessen several current risks to valuable environmental resources in the study area. The general environmental quality of the study area would likely improve over the long term.

Public Safety and Health

Public safety and health services in Iliamna and Nondalton would, on the whole, be improved. There would be less reliance on air transportation between the communities. Small aircraft transportation has a much higher death and injury rate per passenger mile than surface transportation. Therefore accidental

death resulting from travel between the two communities would be less. Safer overland transportation would become the preferred method of travel between Iliamna and Nondalton.

The VPSO in each community would be able to share personnel and facilities. Access to assistance from state law enforcement personnel based in Anchorage or in the region would be improved.

Health care is likely to see immediate gains because it would be easier to share facilities, expertise, equipment and evacuate the critically ill or injured. The difficulty and expense with getting very ill or injured people out of Nondalton in an emergency would be lessened. The road reconstruction project is not likely to increase the burden on local service providers, such as the Bristol Bay Health Cooperative, from car and truck accidents or population increases. Some facilities and services currently need to be over-sized to accommodate the temporary summer and fall population increases.

The road reconstruction would result in a minor increase in the rate of increase of the permanent year-round populations of Iliamna and Nondalton. The study area's summer population swing, which is much more pronounced in Iliamna, is not likely to be exacerbated by the reconstruction of the road.

The reconstruction of the Iliamna-Nondalton Road is likely to result in an overall improvement in the public safety and health services in the study area, for both the near and long term.

Economic

An up-turn in study area employment is likely to occur during reconstruction of the roadway. This may be followed by a period of increased unemployment (a fall back to pre-activity levels) after construction is completed. Several construction projects in the past few years (Nondalton airport, Tazimina Hydro project) have enabled local people to find local employment, acquire skills and earn cash. The reconstruction is likely to generate several short term local jobs for this experienced local workforce. The maintenance of the roadway would generate one long term local state-salaried position.

A road connection would encourage the local economies to expand and diversify. Benefits from a more active economy would accrue mainly to those involved in the cash based economy and to the city of Nondalton due to increased revenues. The Iliamna-Nondalton Road reconstruction is likely to lower the costs of goods in both communities. This is likely to increase trade and commerce between Iliamna and Nondalton. The increased activity is likely to apply to both the local cash and non-cash economy. Price reduction will be especially evident in Nondalton. The cost of construction materials and other heavy or bulky items, which now pay a freight penalty (reportedly up to 25%), is likely to decrease. Less expensive building materials would enable more people to repair, rehabilitate or replace existing structures. This should result in an improvement of the quality of housing in Nondalton. The cost of improving or building new housing in Nondalton is likely to decrease. The ten HUD homes being constructed (1996-1997) in Nondalton have the extra expense resulting from unavailable direct shipment of construction materials

from Iliamna to Nondalton. The high cost of transporting materials significantly reduces the number of homes that can be built with available funds.

The businesses in each community would have immediate access to a larger year-round market, up to 350 people. They would also have direct access to each other. Increased competition may put some marginal operations out of business but access to a larger market is likely to offset any losses. The existing lodges and most other seasonal businesses would not have increased activity or income from an improved connection between the two communities.

Any shift in spending patterns is likely to be more pronounced in Nondalton. For example, Nondalton residents are likely to spend less on boats and four-wheelers and more on cars and trucks. Improved road access would increase the number of miles driven and the increased driving is likely to increase the need for automotive service and repair facilities in the study area. An improvement in the cash economy in Nondalton is likely to lead to an increased number of vehicles.

The improved and safer surface transportation resulting from the road reconstruction would also impact the non-cash economy. Trade, barter and sharing of subsistence resources would be enhanced.

The reconstruction of the Iliamna-Nondalton Road is likely to result in an overall improvement in the economic structure of the study area.

Government

The Iliamna-Nondalton Road would make it easier to supply government services to the study area through increased and less expensive access between the communities. Government facilities at all levels could be consolidated at one place on the road system rather than being spread out among several communities (a regional landfill/incinerator and sharing of school district resources are examples). Savings to government would come in less need for facilities and staff. The borough, state and federal government are likely to experience increased demands for "on the ground management", especially seasonally.

The reconstruction of the Iliamna-Nondalton Road is likely to increase demand for permitting and management responsibilities by the L&PB. The Borough is responsible for local Coastal Management reviews, subdivision approval and has a development permit that covers the disturbance of vegetation within 100 feet of an anadromous stream. (The Borough development permit compliments the ADF&G Title 16 Anadromous Stream permit which addresses only development within anadromous waters.) Increased development would mean that the Borough would be approving and monitoring an increased number of permits. As the L&PB moves to a more active role in the provision of services, the road reconstruction is likely to assist the Borough in the provision of services.

The city of Nondalton is currently having financial trouble meeting its commitments for local basic services such as road maintenance, police, fire protection, solid waste, and water and sewer. The viability of the city and services would be at risk unless the cash economy improves and ways are found to lessen service costs. The completion of the roadway would help stimulate cash flow from sales tax in Nondalton and lessen the cost of providing city services.

The reconstruction of the Iliamna-Nondalton Road is likely to result in an overall improvement in area government services.

Education

Completion of the Iliamna-Nondalton Road would benefit the school district through an improved ability to transport supplies, materials, students and personnel between Iliamna and Nondalton. The improvements would not only reduce costs but would increase the safety of students and staff who travel regularly between the two communities. Specifically, the school district's north area speech pathologist and counselor who resides in the Newhalen/Iliamna area currently travels by air on a regular basis (weekly) to provide services to students in Nondalton. The road reconstruction would also provide the school district options on providing enhanced secondary programs to students in Newhalen and Nondalton where student populations are not large enough to warrant the diversity of curriculum that could be made available if certain classes were consolidated. As an example, a high school teacher from either Nondalton or Iliamna could be shared between schools providing specialized advanced instruction to both schools. Improved transportation services would also provide students from both schools enhanced competition opportunities in sports activities. High school teachers and students going to games or other activities are currently transported by small aircraft. This practice will cease with reconstruction of the road. In the longer term, it might be possible to consolidate the junior high and high school at a central location for the communities. The road connection between school sites at Iliamna and Nondalton would not affect the school district funding from the state.

The reconstruction of the Iliamna-Nondalton Road is likely to result in improvement in the provision of education in the study area with benefits increasing over time, resulting in a long term positive impact on the delivery of educational services in the study area.

Transportation

The following traffic projections were prepared by traffic analysts with the ADOT&PF Highway Data Section. The Iliamna to Nondalton road currently has an estimated Average Annual Daily Traffic (AADT) of 91 vehicles. The projections were based on 1995 traffic count data on the Alaska Peninsula Highway (King Salmon to Naknek road) and used standard federal procedures to calculate design standards. The Alaska Peninsula Highway, although paved, has very similar characteristics to the Iliamna-Nondalton roadway. Special assumptions were a two lane roadway and the bridge is one-way. If the road were

constructed, the AADT would increase slightly to 100 during the construction year (1997), 105 by the mid-life year (2007) and 115 by the design year (2017). The projected growth rate is 1.12 percent per year.

<u>Average Annual Daily Traffic (AADT)</u>	<u>Trips</u>
Base Year 1996	91
Construction Year 1997	100
Mid-Life Year 2007	105
Design Year 2017	115
Growth Rate:	1.12%
Design Hourly Volume:	10%
Recreational Vehicles (ATV):	10% of total.
Commercial Trucks:	0% of total.
Commercial Busses:	10% of total.
Directional Distribution:	30/70
Bicycles:	less than 200 per day
Pedestrians:	Unknown

ADOT&PF Central Region, Maintenance and Operations Section personnel use a figure of about \$5,500 per centerline mile annually to provide routine maintenance on similar rural, gravel roads in this region. Currently, portions of the road are occasionally graded with airport equipment. The project would add 16 roadway miles to the local permanent road maintenance load. Typically this would entail a single additional piece of equipment (grader) and another ADOT&PF maintenance person working five days a week. The estimate covers salary, fringe benefits, fuel, other supplies and equipment maintenance.

The need to maintain existing roads in Iliamna and Nondalton would likely increase from the rehabilitation of the Iliamna-Nondalton Road. The reconstruction would result in increased traffic within the study area. It has been about twenty years since the roads (53 lane miles) in Iliamna have had a new top course. The driving surface is becoming marginal in some areas. The road system in Nondalton is newer but would need increased maintenance resulting from more vehicle traffic and heavier vehicles. The study area would have a small reduction of developed gravel supplies both to build the road and to maintain it. There is no shortage of material supply but additional sites would have to be developed in the future.

Although the bridge design has not been finalized, the following assumptions were used and the annual maintenance cost was calculated. It should be noted that bridges do not typically get scheduled maintenance and that they are not repaired until they are in a state of reduced load carrying capacity. The following assumptions are typical for the type of structure proposed at this crossing.

1. The bridge will be repainted once during its 75 year design life.
2. The bridge joint seals will be replaced twice.
3. The bridge rail will be repaired twice.

4. The salvage value of the bridge is 5 percent of the initial cost.
5. The average annual "cost of money" is 3.5 percent..

Using the assumptions stated above, an annual bridge maintenance cost of \$2,750 was calculated by ADOT&PF. Total maintenance costs for the additional roadway and bridge will be about \$100,000 per year in current dollars.

The necessity to have a boat or airplane for access to Nondalton from Iliamna will be eliminated. The demand for water and air related transportation facilities in Nondalton would be reduced. The availability of an improved road would lead to increased traffic between the two communities. There may be a short term increase in vehicular activity and accidents beyond what would normally be expected on a road with similar design and traffic loads. The newness of the road and connection is likely to encourage some of the local people to use the road as entertainment. Many people in Nondalton are not licensed drivers or have limited practice in using vehicles larger than four-wheelers. Initially, the mix of vehicles (four-wheelers and cars and trucks), a new roadway and lack of experience is likely to lead to more accidents. Over time the newness will wear off and residents will become more familiar with driving. The summer and fall traffic pattern would remain the same. (Lodge owners indicated that the Iliamna-Nondalton Road reconstruction would not be of practical use to them. They would continue to use the road to the old existing landing site for access to the Newhalen River.) Local residents would have less need for use of the old landing site. The traffic pattern and vehicle use, especially in the winter, would change. The comfort and safety of travel in an enclosed vehicle is likely to win out over travel between communities in an open vehicle. Bridge and road design would comply with all applicable safety and navigation requirements and not pose an increased risk to boat or aircraft traffic in the study area.

Existing air taxi operators and air transportation would not be negatively impacted by the road rehabilitation. Air Taxis would continue to be contracted for the delivery of mail. The mail subsidy would enable winter time low passenger volume air service to continue between Iliamna and Nondalton. Past experience with the Dillingham to Aleknagik road demonstrated that flying the mail is competitive with surface transportation even over relatively short distances. Air transportation to other areas in the region and to Anchorage would not be affected by the road reconstruction project.

The potentially dangerous practice of large vehicles (such as road maintenance equipment) fording the Newhalen River just south of the proposed bridge site would cease. Repair or shipment of necessary maintenance vehicles would be easier. The road reconstruction is likely to reduce or eliminate driving on the river ice during unsafe periods. (Several people have lost their lives due to accidents associated with driving on the ice between Nondalton and Iliamna.) The practice of ice driving is likely to continue on occasion during the winter to reach out-lying sites in the region normally accessed by boat or airplane. The reconstruction of the Iliamna-Nondalton Road is likely to result in improvement in surface transportation in the study area.

Lands

Improved access between Iliamna and Nondalton resulting from the reconstruction of the Iliamna-Nondalton Road is likely to result in a minor increase in the pressure to develop private land adjoining the Newhalen River. Some people who live in Nondalton, Iliamna or Newhalen may choose to relocate permanently or establish a summer residence along the road. People who live outside the study area may see the area as an attractive recreational property but would be limited by the lack of direct access and the expense involved.

Overall, road reconstruction is likely to result in less trespass on adjoining private lands. A properly constructed road would tend to keep vehicles on the road and off the adjoining property. All of the land adjoining the right-of-way is private or trust lands. Both INL and Kijik have a permit system that allows the general public access to their lands in the area. Increased access would mean that INL and Kijik could expect a minor increase in permitted and un-permitted activity. At the Nondalton side of the bridge, trespass across Kijik land to launch boats on the Newhalen River would be a minor problem caused mainly by local boat-owners. All the boats using this as a launch would have to come to the road via air freight or barge. Kijik could install bollards and signs to discourage trespass. Kijik, as the landowner, could enforce access restrictions, or, alternatively, establish public facilities for profit-making ventures.

The Iliamna-Nondalton Road reconstruction would provide increased access to private lands (Kijik) on the west side of the Newhalen River. State lands beyond the Kijik lands are provided access by an undeveloped easement, known as a 17(b) easement after the section in ANSCA. Increased traffic on the Iliamna-Nondalton Road would increase demands to improve the 17(b) easement to provide public access to state lands. Access to INL lands would not be improved by reconstruction because they are already accessible via the existing roadway.

Utilities

The reconstruction of the Iliamna-Nondalton Road would allow the INNEC power line to be routed to form a complete loop to Nondalton by adding a power cable to the bridge. This would provide dual service to Nondalton and prevent prolonged power outages from line breaks by ice scour or vehicles breaking the buried segment near Fish Camp. This winter's completion of the Tazimina Hydro project will enable INNEC to meet study area power requirements.

When water levels allow, barges are used to bring most of the bulk petroleum products into the study area. During dry years, such as 1996, barges are unable to make all the necessary trips and communities are left short of fuel supplies. Nondalton must rely upon expensive air transport for winter fuel supplies.

Storage facilities in Nondalton are sometimes not large enough to last the entire winter. The reconstruction of the road would enable fuel trucks to deliver petroleum products to Nondalton year-round. The increased access between the two communities would likely lead to increased consolidation of the local fuel supply. Local fuel storage would be safer and better managed at a combined central facility.

The local phone system has adequate provisions for expansion. The road reconstruction would allow the telephone utility to create a local network, enabling residents to call within the study area without long distance satellite transmitted calls.

Community and individual water and sewer systems would not be adversely impacted by short term impacts from the road reconstruction. As facilities are replaced and expanded, the reconstruction is likely to have a positive effect on the provision of utilities in the study area.

Tourism

The project would have a positive effect on the growth of middle of the market tourism in the area. ADF&G reports the current growth in angler days at between seven and 11 percent per year. Air taxi operators report similar growth rates for their operations during the summer and fall. Many other signs and statistics point to an increase in the utilization of the area. The project would provide some of the infrastructure necessary to accommodate growth of the mid-market tourism.

The reconstruction of the Iliamna-Nondalton Road is likely to result in a minor increase in the number of people floating the river to the take-out near the Iliamna airport. The additional use may be seen by some as a degradation of the Newhalen River experience. As recreational pressure increases on the Newhalen River people would seek out other places and lesser used areas. This "ripple effect" would be felt throughout the area as other smaller and less utilized streams and areas are likely to be used with increasing intensity. Visitation to the Lake Clark National Park and Preserve or other regional federal or state recreation areas is not likely to increase as a result of this project.

Recreational hunting for large land animals (bear, moose, caribou) is likely to increase with road reconstruction, primarily west of the Newhalen River. The improved access to areas with populations of moose, caribou and bear would enable local residents and people from outside the area to explore new and lesser used areas for hunting. The area along or near the road corridor does not support a large number of big game animals and does not receive much hunting pressure. The road project is likely to enhance potential access to outlying areas north and west of Newhalen with light hunting pressure and substantial populations of big game.

The reconstruction of the Iliamna-Nondalton Road is likely to have a minor negative effect on the existing high-end tourist industry in the study area. This effect would be offset by gains in the broader tourism market. The road reconstruction would likely have a positive impact on tourism in the study area.

C. Likely Secondary Impacts Without Reconstruction

This section describes the results of the no-action alternative. The impacts described are an estimation of general trends evolving from the current situation without road rehabilitation.

Environmental

The no-action alternative would allow degradation of the roadway and is likely to lead to increased disturbance of the vegetation along the roadway from off-road driving. Lack of maintenance of the road is likely to increase siltation of the Newhalen River and its eastern tributaries along the roadway. The possibility of a fuel spill into the Newhalen River or Sixmile Lake is likely to be increased. The current method of fuel transportation, small loads and several transfers, make the risk very high. The probability of a large fuel spill or many small spills along the Iliamna-Nondalton Road or in the Newhalen River is likely to be increased. If fuel supplies are restricted in Nondalton in the winter the situation could worsen dramatically. The no-action alternative is likely to have a minor negative effect on the study areas' short-term environment which would increase in magnitude over the longer term.

Public Safety and Health

There is likely to be increased demand for facilities and staff as the communities continue to grow. Without a road connection centralization or sharing would be very difficult.

The current status of public safety would remain much the same. Personnel and equipment sharing and prisoner transport would be difficult. The current status of health services would also remain the same. Sharing facilities and staff would be difficult or impossible. Transportation of the critically ill or injured would be by air, when possible, and life-threatening delays would be likely to occur. A concern would be the continued reliance upon air transportation and the possibility of accidents involving residents, school children or staff, medical personnel or other service providers or visitors to the area.

The no-action alternative is likely to have a negative effect on the study areas' public safety and health care systems, both in the near and long term.

Economic

The slow expansion of the Nondalton cash economy would face difficult times. Without a road connection the small Nondalton cash economy is likely to expand at a much slower rate than Iliamna. Over the longer term, the cash economy in Nondalton may become very unstable, primarily due to the community's isolation from other areas. The Iliamna economy is likely to continue to grow at a rate that reflects the general growth of tourism in the area. Iliamna would continue a conversion to a more cash based economy. The construction, repair and improvement of housing in Nondalton would be costly and for many prohibitive. Nondalton is likely to fall behind other areas in housing availability and quality.

No road reconstruction would have an overall negative effect on the study area's economic structure. This negative impact is likely to increase over time as the differences between single isolated communities (Nondalton) and the rest of Alaska become more pronounced.

Government

With the no-action alternative, government services at all levels would have a tendency to centralize facilities in Iliamna due to better access, despite the larger Nondalton population base. The school district would have increased costs for facilities, transportation and services. Some facilities would have to be duplicated in Nondalton rather than sharing a central facility. The transport of service providers to Nondalton would continue to be by air, raising costs and increasing risk of loss of life. The city of Nondalton is currently having financial trouble meeting its commitments for local basic services. Much of the economy in Nondalton is not cash based and most of what does exist is closely related to federal or state spending. The viability of the city and services would be at risk unless the cash economy improves and ways are found to lessen service costs. Nondalton would be faced with suspension of some basic services.

The no-action alternative is likely to have a negative effect on the study area's government services and viability. The negative effect is likely to increase over time in both communities as further cuts in federal spending are passed along to the local area.

Education

The provision of education to the study area is a major expense both for the local provider, L&PB, and the state. The maintenance of equitable educational opportunities throughout the state, including remote rural areas is a matter of much public debate. A portion of the cost of this service is related to the quality of the access into and within the area. A major transportation improvement, such as reconstruction of the Iliamna-Nondalton Road, will lower costs to both state and local government. The no-action alternative would negate any benefits to the state or local government in funding the constitutionally mandated provision of education.

The no-action alternative is likely to result in a reduction in educational quality and access in the study area due to higher costs and difficulty in transportation and sharing of facilities. Over the long term the negative impacts would increase and result in a negative impact on education for the two communities.

Transportation

The local surface transportation infrastructure would not be improved under the no-action alternative. The existing local traffic pattern is likely to remain unchanged. Vehicular travel north of Alexcy Creek is likely to continue. INNEC would use the roadway for access to its power line to Nondalton and to the Tazimina Hydro project. Study area residents would use the roadway to access areas along the road and to the Fish Camp area near the outlet of Sixmile Lake. Many people are likely to continue to use the roadway to access Nondalton. The unsafe practice of ice driving would continue. Some of this travel would be because ice driving would be the only access available and some would be because of emergency situations. Large vehicles in Nondalton would continue to cross the river, in-stream, for

maintenance, repair and replacement. This would disrupt the stream bottom and run the risk of oil spills. The need for maintenance of the existing road system in Iliamna would remain at about the current level. The road system in Nondalton would need less maintenance due to light use and light vehicle weight. Demands for better water and air related transportation facilities in the study area would likely increase.

The no-action alternative is likely to have a negative effect on the study area's transportation. These negative affects are likely to increase over the longer term.

Lands

The interest in developing land along the Iliamna-Nondalton Road, especially for non-residents of the study, is likely to remain the same without reconstruction. Study area residents are likely to continue to see the area attractive as a part-time residence for recreation or subsistence. Trespass on private lands adjoining the road would likely increase due to off-road driving. The no-action alternative is likely to have minor negative effects on the study area's land ownership, use and development, over both the short term and long term.

Utilities

Electric power to Nondalton would continue to be easily interrupted by vehicles breaking the buried power line or by ice scour. The benefits of a dual line power supply over a single line system would be lost. The maintenance of the power system in Nondalton would continue to rely on Iliamna based crews, equipment and supplies arriving by air to repair or restore service. The costs of materials, such as power poles, in Nondalton would remain high. The high cost of maintenance and repair of the electric system are passed along to all users of the study area.

Fuel transport and storage for Nondalton would remain difficult. The benefits from a larger central storage facility and safer overland mode of transportation would not occur. Nondalton may experience fuel rationing during the winter if supplies run low and air delivery is not available.

The local phone system would not be able to construct a local network. Telephone calls between Iliamna and Nondalton, about 16 miles, would continue to be satellite long distance.

The no-action alternative is likely to have negative effects on the study area's utilities in the short term with negative impacts increasing with time.

Tourism

The no-action alternative would eliminate aesthetic concerns about a bridge over the Newhalen River. The lodges in the area would continue to operate as they have in the past serving the high-end and high-cost clientele. Changes to the existing tourism market would likely continue. The mid-market would

likely continue to become more important for the area. Visitation from Anchorage and other nearby southcentral Alaska communities would likely continue to grow.

The no-action alternative is likely to have a positive effect on the study area's high-end tourism by preserving the aesthetics and perception of wilderness for these visitors. However this segment of the tourism market is relatively stagnant when compared to other sectors which are growing at a much faster rate. The study area will likely lag behind other areas in tourism growth and the ability to service other faster growing sectors without road rehabilitation.

The no-action alternative is likely to have minor negative effects on tourism in the short term and increasing effects in the long term.

D. Likely Cumulative Impacts From Reconstruction

Cumulative impacts are the changes--beneficial and detrimental--which are likely to occur as a result of the proposed action. Cumulative impacts include physical, chemical, and biological changes; but they also include economic, social, and behavioral effects, such as changes in the way people use, share, and enjoy the world around them and the natural resources which it affords; and the effects of these changes on their health, their economic well-being, their quality of life, and their communities or basic social organization. Cumulative impacts are the sum of all of these changes and the reinforcing or dampening interaction between them. Under FHWA guidelines cumulative impacts are defined as effects which *"result from the incremental consequences of an action when added to other past and reasonably foreseeable future actions."*

Transportation

The Iliamna-Nondalton Road reconstruction would have little cumulative effect on statewide or regional transportation. Two very significant factors in the consideration of cumulative transportation impacts from the reconstruction of this road are that the project provides transportation improvement to only 350 full time residents; and the project is isolated from any other surface transportation systems. The Iliamna-Nondalton Road reconstruction will reduce time, cost and weather-induced hardships of personal travel and commerce only between Iliamna and Nondalton. The Iliamna-Nondalton Road reconstruction does not provide a new access into or through the study area or region. Access into the study area is largely by air through the Iliamna airport. No overland connection exists to other road systems. After the road reconstruction the primary access point for the study area will still be the Iliamna airport. The Iliamna-Nondalton Road reconstruction has no effect on other planned transportation projects in the study area, region or state. The cost of maintenance of the bridge and roadway over the next twenty years (\$2,000,000) is not prohibitive nor does maintenance involve any unusual conditions to overcome. The projected maintenance of this project is not likely to, when added to existing and planned transportation improvements, place a restrictive burden on the statewide transportation maintenance funds or services.

Pebble Copper Development

The reconstruction of the north-south Iliamna-Nondalton Road would not establish the transportation corridor for the Pebble Copper mine east-west 100 mile haul road. Cominco has not established specific development plans for its potential mine west of Nondalton. Only options for further development have been postulated. The future development of the Pebble Copper mine and haul road would not be addressed until environmental studies are made, permits are issued and the project becomes economically feasible. The route to tide water preferred by Cominco does not follow the alignment of the existing roadway. The Iliamna-Nondalton Road is not programmed to be built to sufficient standards for industrial use. The 85-130 ton capacity trucks planned to transport the mining concentrate to tide water port would need an industrial standard road and bridges. A complete new road and bridges would be necessary if the Pebble Copper mine project proceeds with development. The Iliamna-Nondalton Road reconstruction would have no cumulative effect on the development of the Cominco mine or other proposed or existing resource extraction developments.

Government

Reconstruction of the Iliamna-Nondalton Road is likely to foster a tendency to centralize all types of services and facilities. Fuel storage, commodities, building supplies, transportation supplies and public and private infrastructure are more likely to be congregated in Iliamna. This would enable the study area communities to combine resources and develop cooperative facilities to benefit the area residents. This consolidation should benefit all residents of Alaska by lowering overall costs for services and allowing state funds to be used with better effect. The L&PB and the city of Nondalton are likely to increase services which will lead to increased local government spending in the study area. The unincorporated Iliamna area is likely to incorporate (or be incorporated) partially as an eventual result of the road reconstruction. The establishment of a local governing body for the Iliamna area is likely to have beneficial effects, both to the area's residents and to the state. The road reconstruction will enhance the viability of the city government services in Nondalton. The Iliamna-Nondalton Road reconstruction would result in minor cumulative benefits to residents of the state through a reduction in the cost of services, less duplication of facilities and the furtherance of independence for the study area.

Social

The trend for rural Alaska areas has been towards less isolation and more connection to the larger world. The roadway would help speed the end of the isolation of Nondalton. Exposure to both the good and bad in a broader social setting would also occur with or without a road connection. Several traditional native leaders interviewed during the research for this study saw change as a natural part of the course of life and necessary. Access to the Internet for the area, just as the installation in the 1980's of community television facilities, is likely to have large social implications over the long term. The Iliamna-Nondalton Road reconstruction would promote social interaction for area residents. School facilities are likely to eventually be combined. More joint activities would occur, such as sporting events and dances, and the

road would help draw people of the area closer together socially. The Iliamna-Nondalton Road reconstruction is likely to have a minor effect in reinforcing, but not changing, the existing social trends in the study area.

Environmental

The Iliamna-Nondalton Road reconstruction would not lead to an increase to pollution in the study area nor would it initiate new negative environmental effects. The reconstruction project is likely to improve some local environmental aspects. The Iliamna-Nondalton Road received environmental permitting in the mid 1980's. ADOT&PF would need to reapply for several environmental agency permits and comply with all permit conditions.

No sensitive wildlife populations and use areas are known in the project area. Current knowledge about the distribution and occurrence of spawning areas for rainbow trout indicates limited knowledge for the project area. As reflected in the sport fishing harvest regulations, the management approach for rainbow trout in the project area is already fairly conservative, in methods, means and bag limit, to minimize the effects of sport fish harvests on rainbow trout populations. At present, it would not appear that opening of the roadway between Iliamna and Nondalton would provide direct access to any sensitive use habitats or harvest areas which would not currently be accessible along the existing roadway or pioneer trail. The road reconstruction would not result in a meaningful impact to statewide or area fish and game populations.

The reconstruction of the Iliamna-Nondalton Road would have an impact on the visual environment of the study area. This impact would come largely from the visual effect of a bridge crossing the Newhalen River. Iliamna and Nondalton have been fortunate in that development that could have visual impacts, such as overhead power lines along the roadway are used only at stream crossings by INNEC. This practice lessens the visual impact of the power line that might, for some, destroy a scenic vista of Roadhouse Mountain from the road. For some people there is no way that a bridge across the Newhalen could be constructed with an acceptable visual appearance. For others development may add to the experience. The Hurricane bridge on the George Parks Highway and the Million Dollar bridge near Cordova are Alaskan examples of bridges which have become tourist attractions. A bridge crossing the Newhalen River would, for some people, impair the perception of a wilderness experience. The impairment of wilderness quality in the immediate area would diminish the quality of the wilderness experience for some visitors. While the bridge crossing of the Newhalen River would be a landmark for users of the river, the crossing site is already visually impacted by the existing roadway, fish drying racks and fish camps. The road reconstruction would not result in a meaningful impact on the visual enjoyment of most visitors to Alaska.

Tourism

Existing use patterns at Lake Clark National Park and Preserve are not likely to be affected by the road reconstruction. Visitation would remain mainly far to the north of the study area. The Tazimina River, within the Preserve near the study area, would continue to be used by an increasing number of recreational users. Local lodges are likely to continue to increase their number of clientele and continue their existing patterns of use. The abundance of fish and game that the lodges depend on would not be affected by the road reconstruction. The Iliamna-Nondalton Road reconstruction is not likely to have any effect on planned tourism development in the study area or region. This project would not materially change the overall pattern of visitation to the state.

The utilization of the Newhalen River fisheries and recreation use of the river exhibits a pattern of increasing recreational use. This growing recreational use in the study area is likely to increase the need for pro-active planning and management of public resources on the Newhalen River and in the study area. The increasing recreational use of the study area is likely to lead to increased pressure on the natural resources which would in turn result in a changing of the wilderness nature of the area. This change of the wilderness nature may result in some lodges shifting to a clientele with different expectations or who are more accepting of development where they recreate. Most of the lodges in the study area would continue to transport clients to remote areas, as they do now, further away from new and existing development. ADF&G personnel have already noted a significant move away from the Iliamna and Nondalton area to the Mulchatna and Nushagak river basins. Those who feel it necessary to have a pristine wilderness experience, and have the means to do so, would continue to seek other areas further away from development.

E. Likely Cumulative Impacts Without Reconstruction

The following describes cumulative impacts, effects which “*result from the incremental consequences of an action when added to other past and reasonably foreseeable future actions*” (FWHA), resulting from the no-action alternative.

Economy

The differential in the cost of living between Iliamna and Nondalton would escalate. Heating oil in particular is likely to have a much higher cost in Nondalton due to transportation costs. Most of the money in increased costs would leave the local economy and not re-circulate to create jobs. Economic opportunities and diversity for the study area would be reduced. Residents are likely to become increasingly dependent upon transfer payments and subsistence. The no-action alternative would likely result in negative cumulative impacts.

Recreation Tourism

Recreational use of the study area is likely to have increased conflicts with subsistence use. Recreational use, especially those activities that consume subsistence resources, would have a greater impact on the local subsistence users.

The aesthetic integrity of the Newhalen River would be left intact for a longer period of time. The perception of a wilderness area would be retained. The impairment of the wilderness experience would come from development on private lands along the Newhalen River and increases in the number of clients, lodge and guide operations in the study area.

Hunting and fishing pressure is likely to increase at a lesser rate in the area north and west of the Newhalen River due to restricted overland access. Overall, the study area recreation tourism would likely experience positive cumulative impacts without the road construction.

Public Safety/Health/Transportation/Government

Facilities and services are likely to have a lesser tendency to consolidate, limiting the opportunity for cost reductions. Choices will have to be made about duplicating facilities and services in Iliamna and Nondalton. At some point, the state would have to consider expansion of the Nondalton Airport to accommodate larger aircraft.

Summer population would be less in Nondalton and greater in Iliamna. Facilities related to the increased summer population would need to be over-sized in Iliamna to accommodate the loads. Overall, without the road reconstruction, negative cumulative impacts will likely occur.

VI. Appendix

A. List of Personal Communications

1. Mark Dalton, HDR 274-2000
2. Bob Arce, L&PB Assembly, Moody's Fuel 571-1278
3. Brent Petrie, INNEC Manager 571-1259
4. George Cannelos, USKH 276-4245
5. Dennis Neidermeyer, L&PSD 246-4280
6. Tom Green, Nondalton Mayor 294-2224
7. Keith Flanagans, VPSO 294-2235
8. Steve Willis, Local Barge Service 294-2241
9. Frank Fiala, Acting Superintendant LCNPP 283-5855
10. Lee Fink, Chief Ranger LCNPP 781-2102
11. Wassie Balluta, Bristol Bay Fisherman 571-1218
12. Glen Alsworth, L&PB Mayor 781-2212
13. Walt Wrede, L&PB Manager 246-3421
14. Wayne Dolezal, ADF&G 267-2333
15. Kelly Hepler, ADF&G 267-2218
16. Dick Sellers, ADF&G 246-3340
17. Larry Vandale, ADF&G Game 842-2334
18. Mac Minard, ADF&G Sport Fish 842-5227
19. Pippa Coliey, ADF&G Subsistence 842-5925
20. Jeff Regnart, ADF&G 246-3341
21. Sheryl Cowan, PTI 562-1231
22. Sue Burns, CFEC 789-6150
23. Greg O'Keef, Kijik Native Corporation 561-4487
24. John Adcox, Iliamna ADOT&PF 571-1261
25. Harvey Anelon, Iliamna ADOT&PF 571-1261
26. Henry Anelon, VPSO, Iliamna 571-1295
27. Myrtle Anelon, Iliamna Cafe Owner 571 -1463
28. John Baechler, 571-1525
29. Sue Arce, Area Health Aid Coordinator 571-1232
30. Jerry Armstrong, Iliamna Airport Market, Manager, 571-1586
31. Jim Lamont, Mayor City of Newhalen 571-1226
32. Thomas Hedlund, President INNEC Board of Directors 571-1216
33. Harry Ricci, 571-1248
34. Ronald Wassillie, President Newhalen Tribal Council 571-1278
35. Diane Armstrong, Iliamna Trading 571-1225
36. Lem Batchelder, Airport Hotel 571-1276
37. Tim LaPorte, Fish and Game Advisory Committee 571-1248
38. William Willoby, Cominco 509-922-8787
39. Debby Tennison, DCRA Dillingham 842-5135
40. Jim Glaspell, Resource Analysts 694-2126
41. Douglas B. Baily, Attorney 274-2484
42. Jeff Parker, Anchorage Fish and Game Advisory Committee 272-9377
43. Woods Air Service 745-4831
44. Northern Air Cargo 243-3331
45. John Byler, Division of Tourism 456-2012
46. Jack Hession, Alaska Sierra Club 276-4048
47. Clara Trefon, Nondalton Tribal Council, 294-2220
48. Sonny LaVesque, Nondalton resident, 294-2231
49. Pete Trefon, Nondalton, Village Council Chief (no phone)
50. Lodges in the area:

- a. ALASKA SAFARI INC.
Valhalla Lodge
Kirk D. Gay
P.O. Box 190583
Anchorage, Alaska 99519
907-243-6096
- b. ALASKA WILDERNESS
LODGE
Pat & Carl Bullo
Wilderness Point
General Delivery
Port Alsworth, Alaska 99653
P.O. Box 700
Sumner, Washington 98390
800-835-8032
- c. BRISTOL BAY
SPORTFISHING
Bruce Johnson
P.O. Box 164 (summer)
Iliamna, Alaska 99606
212 N. 4th Ave. #139
(winter)
Sandpoint, Idaho 83864
208-263-8594
- d. COPPER RIVER LODGE
P.O. Box 200831
Anchorage, Alaska 99520
907-571-1464
907-344-3677
- e. CUSACK'S ALASKA LODGE
Roger & Lula Cusack
P.O. Box 194 (Summer)
Iliamna, Alaska 99606
907- 571-1202 FAX 907-
571-1202
8920 S. E. 45th St. (winter)
Mercer Island, Washington
98040
206-232-3278 FAX 206-
232-102
- f. FISHING UNLIMITED
LODGES
Ken Owsichek
P.O. Box 190301
Anchorage, Alaska 99519
907-243-5899 FAX 907-243-
2473 (winter)
907-781-2213 FAX 907-781-
2244 (summer)
- g. ILIAMNA LAKE RESORT
Jim Winchester
P.O. Box 208
Iliamna, Alaska 99606
907-571-1387
- h. ILIASKA LODGE
Ted Gerken
P.O. Box 228
Iliamna, Alaska 99606
907-571-1221
- i. LAKESIDE LODGE
Brad or Sheryl Johnson
Port Alsworth, Alaska 99653
907-781-2202
2100 Ebinport Rd. (winter)
Rockhill, South Carolina
29732
803-366-4564
- j. LAKE VIEW LODGE
Tim and Nancy La Porte
P. O. Box 109
Iliamna, Alaska 99606
907-571-1248
- k. NEWHALEN LODGE
Bill Sims
3851 Chinak Bay Dr.
Anchorage, Alaska 99515
907-522-3355
907-294-2233
- l. POINT ADVENTURE
LODGE
Mark Kneen
P.O. Box 141
Iliamna, Alaska 99606
800-676-3471
- m. RAINBOW KING LODGE
Craig Augustynovich, Mgr
P.O. Box 106
Iliamna, Alaska 99606
907-571-1277
800-458-6539
- n. RED QUILL LODGE
John Baechler, Mgr.
P.O. Box 49
Iliamna, Alaska 99606
907-571-1215
- o. THE FARM LODGE
Glen and Patty Alsworth
Port Alsworth, Alaska 99653
907-781-2211
800-662-7661

B. Bibliography

- Alaska Department of Fish and Game. Harvest, catch, and participation in Alaska sportfisheries during 1994, Fishery data series no. 95124, 1995.
- Alaska Department of Fish and Game. Community Profile Database Catalog - Southwest Region, Vol 3, September 1995.
- Alaska Department of Fish and Game. Subsistence in Newhalen and Iliamna, October 1993.
- Alaska Department of Fish and Game. Alaska Habitat Management Guide, Southwest Region, Vol. 1, Distribution of Mammals. 1985.
- Alaska Department of Fish and Game. Alaska Habitat Management Guide, Southwest Region, Vol. 3, Distribution of Fish. 1985.
- Alaska Department of Fish and Game. Alaska Habitat Management Guide, Southwest Region, Vol. 4, Human Use of Fish and Wildlife. 1985.
- Alaska Department of Fish and Game. Catalog of Waters Important for the Spawning, Migration, Rearing, and Overwintering of Anadromous Fish (list and associated maps for Iliamna quadrangle D-5 and D-6). Division of Habitat and Restoration. 1996.
- Alaska Department of Fish and Game. Sport Fishing Regulations Summary for Kodiak Island and Southwest Alaska. (Effective April 15, 1996 through April 4, 1997) 1996.
- Alaska Dept. of Natural Resources. Cumulative and Secondary Impacts and the Alaska Coastal Zone Management Program, Draft, Alaska Dept. of Natural Resources, June 1994.
- Alaska Department of Natural Resources. Bristol Bay Area Plan for State Lands, Alaska Department of Natural Resources, Alaska Department of Fish and Game and Department of Environmental Conservation, September 1984.
- Alaska Department of Natural Resources. Nushagak & Mulchatna Rivers Recreation Management Plan, Alaska Department of Natural Resources, Alaska Department of Fish and Game and Bristol Bay Coastal Resource Service Area, August 1990.
- Alaska Dept. of Transportation and Public Facilities, Central Region, Division of Planning, Nondalton-Newhalen/Iliamna pioneer road economic feasibility study, March 1986.
- Alaska Geographic Society. Lake Clark, Lake Iliamna Country, Alaska Geographic v. 13 no. 4, 1986.
- Alaska State House Transportation Committee. Nondalton/Newhalen Road Project Summary, February 15, 1983.
- Alaska Dept. Commerce & Economic Development. Alaska Visitor Statistics, Alaska Visitor Patterns, Alaska Dept. Commerce & Economic Development, Div. of Tourism, Summer 1993.
- Arctic Environmental Information Center. Alaska Climate, Alaska Climate Summaries, 1990.
- B&B Environmental. Kenai River Crossing Sterling Highway to Funny River Road Socio-Economic Secondary Impact Study, June 1992.

- Behnke, Steven. Wildlife utilization and the economy of Nondalton, Alaska Dept. of Fish and Game, Division of Subsistence, Technical paper number 47, 1982.
- Behnke, Steven. Background, Iliamna-Newhalen subsistence salmon fishery, Alaska Dept. of Fish and Game, Division of Subsistence, Technical paper number 44, 1981.
- Bundtzen, Thomas K. Portage Creek gold placers, Lake Clark quadrangle, Iliamna District, Alaska, Alaska Department of Natural Resources, Division of Geological and Geophysical Surveys, report no. 120, 1979.
- Christopher Beck & Associates for Bristol Bay Native Association, Bristol Bay Tourism Development Regional Strategies and Investment Opportunities, May 1994.
- Commercial Fisheries Entry Commission, Commercial Fishing Data Aggregated by Census Division, 1994.
- Dames and Moore. Methodology for the Analysis of Cumulative Impacts of Permit Activities Regulated by the U.S. Corps of Engineers, Contract DACW72-80-C-0012, July 30, 1981.
- Environmental Impact Review. Defining and Analyzing Cumulative Environmental Impacts, Environmental Impact Review no. 11, 1991.
- Federal Highway Administration. Secondary and Cumulative Impact Assessment, Federal Highway Administration, Project Development Branch, 1993.
- Federal Highway Administration. Secondary and Cumulative Impact Assessment in the Federal-Aid Highway Project Development Process, Federal Highway Administration, 1990.
- Federal Highway Administration. Guidance for Preparing and Processing Environmental and Section 4(f) Documents, Federal Highway Administration Technical Advisory T 6640.8A, 1988.
- Gaba, Jeffery M. Environmental Law, West Publishing Company, 1994.
- Gray, Glenn. Regulation of Cumulative and Secondary Impacts in Alaska, Office of the Governor, 1993.
- Laitos, Jan G. Energy and Natural Resources Law in a Nutshell, West Publishing Company, 1992.
- Lake and Peninsula Borough and Dept. of Community and Regional Affairs. Lake and Peninsula Borough Coastal Management Plan, State Approved Draft, March 1996.
- Lake and Peninsula Borough, Lake and Peninsula Borough Comprehensive Plan, 1993.
- Lake and Peninsula Borough, Economic and Transportation Analysis of the Nondalton-Iliamna Inter-Village Road System, October 1993.
- Morris, Judith M. Subsistence production and exchange in the Iliamna Lake region, southwest Alaska, 1982-1983, Alaska Department of Fish and Game, Division of Subsistence, technical paper number 136, 1986.
- NOAA, University of Maine School of Law, Marine Law Institute. Methodologies and Mechanisms for Management of Cumulative Coastal Environmental Impacts, September 1995.
- Northern Economics and ResourceEcon. A Technical Report for the Whittier Access Project, January 1995 rev. March 1995.

- Parker, Jeff. Central Bristol Bay Drainages Fish and Game Reserve, Proposal 20, Background Materials, Alaska Board of Fisheries, March 11, 1996.
- U.S. Dept. of Transportation. U.S. Airport NPIAS Enplanement Activity Summary for CY 1993 - FY 1995, April 21, 1995.
- U.S. Bureau of Land Management, Alaska Planning Group. Alaska interagency fire management plan: Kuskokwim/Iliamna planning area, U.S. Bureau of Land Management, Alaska Planning Group, 1983.
- U.S. Fish and Wildlife Service. Iliamna National Conservation Area: Final environmental impact statement supplement, U.S. Fish and Wildlife Service, 1980.
- U.S. Bureau of Land Management, Alaska Planning Group. Iliamna National Conservation Area: Final environmental impact statement, October 1974.
- U.S. Bureau of Land Management. Iliamna National Conservation Area: A proposal, 1973.
- U.S. Dept. of Health and Human Services. Sanitation Facilities construction, city of Newhalen, Alaska: final report. U.S. Dept. of Health and Human Services, Public Health Service, Indian Health Service, Alaska Area Native Health Service, Environmental Branch, 1983.
- U.S. Dept of Commerce, Bureau of Census. Alaska Population Characteristics, 1990 Census. Compiled by the Alaska Department of Labor, Research & Analysis, June 1991.
- U.S. Department of the Interior, National Park Service, Lake Clark National Park and Preserve General Management Plan and Environmental Assessment, August 1984.
- U.S. Department of the Interior, National Park Service, Port Alsworth Field Management Site Plan and Environmental Assessment, June 1990.
- World Wildlife Fund. Making Decisions on Cumulative Environmental Impacts: A Conceptual Framework, World Wildlife Fund, 1990.

C. Relevant Statutes and Regulations

1. AS 44.42.050 State Transportation Plan

(a) The commissioner shall develop annually a comprehensive, intermodal, long-range transportation plan for the state. In developing and revising the state plan, the commissioner shall consider means and costs of improving existing modes and facilities, state and federal subsidies, and the costs and benefits of new transportation modes and facilities. The commissioner shall also consider the recommendation of the Alaska Transportation Planning Council. The plan shall be submitted to the governor for review and approval and submitted by the governor to the legislature.

(b) In developing and revising the plan, the commissioner shall seek public review and evaluation by any reasonable means and may

- (1) consult and cooperate with officials and representatives of the federal government, other governments, interstate commissions and authorities, local agencies and authorities, interested corporations and other organizations concerning problems affecting transportation in the state; and
- (2) request from any agency or other unit of the state government or of a political subdivision of it, or from a public authority, the assistance and data that may be necessary to enable the commissioner to carry out responsibilities under this section; every such entity shall provide the assistance and data requested.

2. 17 AAC 05.030 Off-System Roads

(a) In order to provide access that is appropriate for specific uses and local conditions, the department may classify a road, which is not part of the Alaska Highway System described in 17 AAC 05.010, as a trail, basic access road, pioneer road or community road under (b) - (e) of this section.

(b) A trail may be any foot path or way open to public use as a matter of right that

- (1) is not more than eight feet wide;
- (2) is not graded or surfaced; and
- (3) whose drainage improvements, if any, do not meet minimum department standards for secondary roads.

(c) A basic access road may be any road open to the public as a matter of right that

- (1) is at least eight feet wide;
- (2) has portions of its route graded and surfaced;
- (3) has drainage improvements that do not meet minimum department standards for secondary roads;
- (4) has structural improvements that permit the fording of streams;
- (5) has no signs indicating road junctions or other road-related information; and
- (6) provides access to a
 - (A) cabin, homestead, or lodge, or
 - (B) mineral resource extraction site.

(d) A pioneer road may be any road open to the public use as a matter of right that

- (1) is at least eight feet wide;
- (2) has portions of its route graded and surfaced;
- (3) has drainage improvements that do not meet minimum department standards for secondary roads;
- (4) has structural improvements that permit the fording of streams, gullies and wet areas;
- (5) has signs indicating road junctions and other road-related information; and
- (6) provides access from a
 - (A) town, village or community to a local site used by the residents of the town, village or community, or
 - (B) mineral resource extraction site to a mineral resource transportation facility.

(e) A community road may be any road open to the public use as a matter of right that

(1) meets the minimum department standards for secondary roads, as set out in the Alaska Department of Transportation and Public Facilities Highway Preconstruction Manual, Part II, including those standards set out in ch. 11, Section 11-03.06, Drainage; and

(2) provides access from a

(A) town, village or community to a local site used by the residents of the town, village or community, or

(B) mineral resource extraction site to a mineral resource transportation facility.

3. 23 CFR 460.2 (a) defines the term "public road".

Public Road

.... means any road under the jurisdiction of and maintained by a public authority and open to public travel.

4. 40 CFR1508.7 defines cumulative impact

"... the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (Federal non-Federal) or persons undertake such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

5. Categorical Exclusion Documents

The following are federal regulations that address a categorical exclusion (CE). They define this term and the parameters under which a CE may be granted. Included is an agreement between the FHWA and ADOT&PF that clarifies which actions qualify for a CE.

40 CFR 1508.4 - Definition of categorical exclusion

"Categorical Exclusion" means a category of actions which do not individually or cumulatively have a significant effect on the human environment and which have been found to have no such effect in procedures adopted by a Federal agency in implementation of these regulations (§1507.3) and for which, therefore, neither an environmental assessment nor an environmental impact statement is required. An agency may decide in its procedures or otherwise, to prepare environmental assessments for the reasons stated in §1508.9 even though it is not required to do so. Any procedures under this section shall provide for extraordinary circumstances in which a normally excluded action may have a significant environmental effect.

6. 23 CFR Ch.1 §771.117 - List of categorical exclusions

(a) CEs are actions which meet the definition contained in 40 CFR 1508.4, and, based on past experience with similar actions, do not involve significant environmental impacts. They are actions which: do not induce significant impacts to planned growth or land use for the area, do not require the relocation of significant numbers of people; do not have a significant impact on any natural, cultural, recreational, historic or other resource; do not involve significant air, noise, or water quality impacts; do not have significant impacts on travel patterns; or do not otherwise, either individually or cumulatively, have any significant environmental impacts.

(b) Any action which normally would be classified as a CE but could involve unusual circumstances will require the Administration, in cooperation with the applicant, to conduct appropriate environmental studies to determine if the CE classification is proper. Such unusual circumstances include:

(1) Significant environmental impacts;

(2) Substantial controversy on environmental grounds;

(3) Significant impact on properties protected by Section 4(f) of the DOT Act or Section 106 of the National Historic Preservation Act; or

(4) Inconsistencies with any Federal, State, or local law, requirement or administrative determination relating to the environmental aspects of the action.

(c) The following actions meet the criteria for CEs in the Council on Environmental Quality (CEQ) regulation (40 CFR 1508.4) and §771.117(a) of this regulation and normally do not require any further NEPA approvals by the Administration:

- (1) Activities which do not involve or lead directly to construction, such as planning and technical studies; grants for training and research programs; research activities as defined in 23 U.S.C. 307; approval of a unified work program and any findings required in the planning process pursuant to 23 U.S.C. 139; approval of statewide programs under 23 CFR part 630; approval of project concepts under 23 CFR part 476; engineering to define the elements of a proposed action or alternatives so that social, economic, and environmental effects can be assessed; and Federal-aid system revisions which establish classes of highways on the Federal-aid highway system.
- (2) Approval of utility installation along or across a transportation facility.
- (3) Construction of bicycle and pedestrian lanes, paths, and facilities.
- (4) Activities included in the State highway safety plan under 23 U.S.C. 402.
- (5) Transfer of Federal lands pursuant to 23 U.S.C. 317 when the subsequent action is not an FHWA action.
- (6) The installation of noise barriers or alterations to existing publicly owned buildings to provide for noise reduction.
- (7) Landscaping.
- (8) Installation of fencing, signs, pavement markings, small passenger shelters, traffic signals, and railroad warning devices where no substantial land acquisition or traffic disruption will occur.
- (9) Emergency repairs under 23 U.S.C. 125.
- (10) Acquisition of scenic easements.
- (11) Determination of payback under 23 CFR part 480 for property previously acquired with Federal-aid participation.
- (12) Improvements to existing rest areas and truck weigh stations.
- (13) Ride sharing activities.
- (14) Bus and rail car rehabilitation.
- (15) Alterations to facilities or vehicles in order to make them accessible for elderly and handicapped persons.
- (16) Program administration, technical assistance activities, and operating assistance to transit authorities to continue existing service or increase service to meet routine changes in demand.
- (17) The purchase of vehicles by the applicant where the use of these vehicles can be accommodated by existing facilities or by new facilities which themselves are within a CE.
- (18) Track and railbed maintenance, and improvements when carried out within the existing right-of-way.
- (19) Purchase and installation of operating or maintenance equipment to be located within the transit facility and with no significant impact off the site.
- (20) Promulgation of rules, regulations, and directives.

(d) Additional actions which meet the criteria for a CE in the CEQ regulations (40 CFR 1508.4) and paragraph (a) of this section may be designated as CEs only after Administration approval. The applicant shall submit documentation which demonstrates that the specific conditions or criteria for these CEs are satisfied and that significant environmental effects will not result. Examples of such actions include, but are not limited to:

- (1) Modernization of a highway by surfacing, restoration, rehabilitation reconstruction, adding shoulders, adding auxiliary lanes (e.g., parking, weaving, turning, climbing).
- (2) Highway safety or traffic operations improvement projects including the installation of ramp metering control devices and lighting.
- (3) Bridge rehabilitation, reconstruction or replacement or the construction of grade separation to replace existing at-grade railroad crossings.
- (4) Transportation corridor fringe parking facilities.
- (5) Construction of new truck weigh stations or rest areas.
- (6) Approvals for disposals of excess right-of-way or for joint or limited use of right-of-way, where the proposed use does not have significant adverse impacts.

7. Coastal Management

The following enforceable policies are extracted from the L&PB coastal management plan. The policies are grouped by subject categories. The following policies are likely to apply to the permitting of the Iliamna-Nondalton Road project.

A. COASTAL DEVELOPMENT

A-2 Mitigation

All land and water use activities shall be conducted with a level of planning, implementation, and monitoring/enforcement which is appropriate to mitigate potentially adverse effects and/or cumulative impacts on the following resources of local, state, or national importance:

- a) fish and wildlife populations and their habitats;
- b) commercial fishing uses and activities;
- c) subsistence and personal use resources and activities;
- d) air and water quality;
- e) cultural resources; and
- f) recreational resources.

The cost of mitigation relative to the benefit to the coastal resource shall be considered in the implementation of this policy. Mitigation is the responsibility of the project or activity permit applicant.

Mitigation shall include and be considered in the following order of preference:

- a) avoid the loss altogether by not taking a certain action or parts of an action;
- b) when the loss cannot be avoided, minimize the loss by limiting the degree or magnitude of the action and its implementation;
- c) when the loss of resources and/or associated activities of local, state, or national concern cannot be minimized, restore or rehabilitate the resource to its pre-disturbance condition, to the extent feasible and prudent; and
- d) where the loss of important habitat or activities of local, state, or national concern is substantial and irreversible and cannot be avoided, minimized or rectified, compensate for the loss by replacing, enhancing, or providing substitute resources or environments. Compensation may be in-kind or out-of-kind, and off-site or on-site. The preferred option is in-kind and on-site, to the extent feasible and prudent.

A-3 Multiple Use

To the extent feasible and prudent, ports, piers, docks, terminals, cargo handling, storage, parking, and other coastal facilities shall be designed and utilized to minimize the need for duplicate facilities. Subsequent use of facilities for other than their original intent shall also be a consideration in the siting and design of such facilities.

A-4 Compatibility

To the extent feasible and prudent, activities on and uses of coastal lands and waters shall be compatible with adjacent land and water uses.

A-5 Dredge and Fill Requirements

Projects that involve dredging or filling in streams, rivers, wetlands, lakes, or marine areas including estuaries and tidelands, shall be located, designed, constructed, operated, and maintained to:

- a) avoid significant adverse impacts to important fish and wildlife habitats;
- b) avoid significant interference with fish migration, spawning, and rearing as well as critical life history stages of wildlife;
- c) limit the extent of direct disturbance to the minimum area necessary to accommodate the proposed purpose or use;
- d) minimize erosion and the potential for turbid waters and waterborne sediment to be transported away from the dredge or fill site; and

- e) provide for circulation and drainage patterns adequate to maintain habitat productivity and water quality.

A-6 Disposal of Dredge Spoil

Dredged materials disposed of in shoreline landfills shall not cause significant alteration of important habitats or significant adverse impacts to coastal processes such as circulation, sediment transport, and coastal erosion and deposition patterns. On-shore disposal sites for dredged material shall be contained and stabilized to prevent erosion and leaching into adjacent waters. Offshore disposal of dredge spoil shall avoid important marine habitats and be conducted in compliance with state and federal water quality regulations.

A-7 Navigation Obstructions

Uses and activities in coastal waters shall meet the following requirements:

- a) Structures and buoys placed in navigable waters shall be visibly marked and placed in a manner to minimize navigation hazards or obstructions to other uses of coastal habitats;

B. COASTAL HABITATS AND RESOURCES

B-1 State Habitat Standards

The Lake and Peninsula Borough Coastal Management Program adopts the Alaska Coastal Management Program (ACMP) Standards for coastal habitats contained in 6 AAC 80.130. Development activities and facility sites shall meet, at a minimum, the criteria established under the referenced standards and State regulations unless a greater performance standard is applicable under specific policies of the L&PB coastal program.

B-2 Upland Habitats

To the extent feasible and prudent, projects in upland habitats shall be designed, constructed, and maintained to assure that runoff volume, velocity, and sediment loads do not cause accelerated erosion, and to retain natural drainage patterns, surface water quality, and natural groundwater recharge areas. Disturbance of existing vegetation in a manner which may adversely affect slope stability or productivity of important upland habitats shall be minimized.

B-3 Maintenance of Fish Habitat

Maintenance and enhancement of fish habitat will be given the highest priority when evaluating projects which may impact fish spawning, migration, rearing, and overwintering areas. Shorelines that have banks, beaches, and streambeds critical to fish populations will be maintained in a productive condition comparable to the natural or pre-disturbance state.

B-4 Anadromous Fish Waters

With the exception of approved transportation and utility crossings, water dependent structures, and uses involving the research, protection, or enhancement of anadromous fish or their habitats, no development activities, alteration of vegetation, excavation, placement of fill, or land clearing shall take place within a minimum distance of 100 feet from the ordinary high water mark of anadromous fish waters unless feasible and prudent alternatives are not available, and the protection of water quality and stream habitat can be assured. Exceptions or variances of either more than or less than 100 feet from the ordinary high water mark of anadromous fish streams shall minimize adverse impacts to water quality and fish and wildlife habitat. Where feasible and prudent, additional setback distances may be required by permitting entities on a site-specific basis, in consultation with the ADF&G, to protect riparian and stream habitats.

The following criteria will be considered in evaluating setback variations:

- a) the presence and sensitivity of anadromous fish using the site;
- b) the nature and timing of the proposed activity or anticipated disturbance, including construction and operation, and the size and configuration of the development with respect to the anadromous fish waters;

- c) the characteristics and function of existing riparian vegetation; and
- d) the slope, soil type, and soil stability at the proposed activity site as it affects the potential for erosion problems.

B-5 Drainage Structures and Maintenance of Fish Passage

Development activities, facilities, and structures shall be designed, sited, constructed, operated, and maintained in a manner which does not impede or interfere with timely access to spawning streams by adult fish or in-stream movements of juvenile fish.

All cross drainage structures on fish streams, including bridges and culverts, shall:

- a) be sited, constructed, and maintained to avoid changes to the direction or velocity of the stream flow;
- b) be adequately sized to accommodate the best available estimate of the 25-year peak discharge without significantly interfering with the volume, velocity, sediment transport, or substrate characteristics of the stream;
- c) provide for efficient passage or movements of fish upstream, downstream and in associated aquatic habitats, including wetlands; and
- d) avoid disturbance of fish spawning habitat.

B-9 Raptor Nest Sites

Development activities shall avoid harming or disturbing identified nest sites for raptors, or nest sites identified during project planning or review, by timing potentially disturbing operations when raptors are not breeding or nesting, or by retaining a buffer around occupied nest sites. The U.S. Fish and Wildlife Service and the ADF&G should be contacted for information concerning the known locations of raptor nest sites and appropriate criteria to minimize significant adverse impacts to nest sites and nesting activity. Bald eagle nest sites shall be protected in conformity with the Bald Eagle Protection Act (16 USC 668) and the use, size and management of bald eagle nest site buffers shall be determined on a case by case basis by the U.S. Fish and Wildlife Service.

B-12 Bank Stabilization

All stream or lake bank cuts, fills, or exposed earthwork adjacent to streams, wetlands, or marine waters shall be stabilized to prevent erosion or sedimentation into adjoining waters during construction, operation, and following abandonment of development activities.

C. AIR, LAND, AND WATER QUALITY

C-1 State Standards

The Lake and Peninsula Borough Coastal Management Program adopts the ACMP air, land, and water quality standards in 6 AAC 80.140. The following policies supplement these standards. Where state standards and the policies of this section present differing requirements, the stricter standard shall be applied.

C-5 Discharge of Suspended and Settleable Solids

Development facilities, uses, and activities shall not allow suspended materials or settleable solids to be introduced into waters of the Borough in a manner, timing, or quantity which could have a significant adverse impact on marine or freshwater productivity or habitats, marine fish, shellfish, or resident or anadromous fish populations. Upon application and in its discretion, the Alaska Department of Environmental Conservation (ADEC) may grant short-term variances as appropriate, in accordance with the regulations stated in the Alaska Water Quality Standards.

D. SUBSISTENCE USE/PERSONAL USE

D-1 State Standards

The L&PB adopts the subsistence standards presented in ACMP regulation 6 AAC 80.120(a).

D-2 Development Impacts

Traditional subsistence activities are recognized as an extremely important use of the coastal resources in the Borough. Maintenance of subsistence use areas and activities shall be given high priority in areas of traditional use. Prior to authorization of a potentially-conflicting development activity, the project applicant shall conduct an analysis of the possible adverse impacts upon subsistence use and shall identify, in consultation with the Borough and fish and wildlife resource agencies, appropriate safeguards to assure continued access and use of subsistence resources.

E. TRANSPORTATION AND UTILITIES

E-1 Stream Crossings

Bridges and culverts shall be designed, constructed, and maintained in accordance with Policy B-6 and fisheries conservation practices which minimize habitat disturbance and allow efficient fish passage up and downstream.

E-2 Maintaining Traditional Public Access

Restrictions on traditional methods and means of public access through municipal, state, and federal land shall be minimized. Elements of public access include roads, waterways, trails, campsites, picnic sites, and marine anchorages. Prior to disposal of municipal, state, or federal lands, public access routes shall be identified and dedicated.

E-3 Off-Road Access

Off-road access shall minimize surface disturbance and impacts to fragile soils and wetlands.

E-4 Siting, Construction, and Operation

Transportation, pipeline, and utility facilities and corridors shall be sited, designed, constructed, and operated, using the following standards:

- a) adverse impacts to habitats, biological resources, coastal resource uses, recreation, socio-economic characteristics, and traditional subsistence and personal use activities shall be minimized;
- b) to the extent feasible and prudent, transportation corridors and facilities shall be consolidated; and,
- c) to the extent feasible and prudent, road, utility, and pipeline crossings of resident and anadromous fish streams shall be minimized and consolidated at a single location to reduce multiple impacts to an individual drainage.

F. FISHERIES AND SEAFOOD PROCESSING

F-1 Protection of Fisheries

Maintenance and enhancement of fisheries shall be given high priority in land use management plans and in reviewing or permitting any activities which may adversely impact important fisheries habitat, fish migration routes, or the recreational or commercial harvest of fish.

F-2 Development

Development shall incorporate appropriate designs and measures to mitigate significant adverse impacts to fisheries resources, recreational fishing, enhancement projects, subsistence or personal use fishing, or commercial fishing, in accordance with Policy A-2.

G. GEOPHYSICAL HAZARD AREAS

G-2 Coastal Processes

Development and resource extraction activities shall be sited and conducted to minimize accelerated coastal erosion or adverse impacts to coastal processes which could contribute to increased geophysical hazards.

G-4 Erosion

To the extent feasible and prudent, development activities shall retain existing vegetative cover in erosion-prone areas. In cases where development necessitates removal of vegetation, erosion shall be minimized through re-vegetation or by other appropriate erosion control measures.

G-5 Structural Erosion Control Measures

Structures and facilities adjacent to the shorelines of rivers, streams, lakes, or marine waters shall be sited, designed, and constructed to minimize the need for erosion control or stabilization measures and to minimize interference with natural shoreline processes. Borough subdivisions and State land disposals shall be designed to provide sufficient lot depth to minimize the need for shoreline stabilization measures to protect facilities or improvements.

H. RECREATION

H-1 Protection of Recreation Values

Projects and activities on public lands and waters used for recreational activities, or on private lands and waters where the landowner has granted formal permission for recreational activities, shall be located, designed, constructed, and operated to minimize adverse impacts to recreation resources and activities, including access. To the extent feasible and prudent, activities which conflict with recreational uses shall be conducted in a manner which minimizes conflicts or provides alternative recreation opportunities or access.

I. ARCHAEOLOGICAL AND HISTORIC RESOURCES

I-1 Cultural and Historic Resource Areas

In consultation with the State Historic Preservation Office, assessment of potential impacts to cultural and historic resources, and the identification of appropriate mitigation, shall be the responsibility of the developer. The potential adverse impacts of development on known historic and archaeological values (state and federal historic resource registers) shall be evaluated early in project planning.

I-2 Resource Protection

Uses and activities which may adversely affect cultural resource areas shall comply with the following standards:

- a) where there is potential for undiscovered cultural or historic sites in a project area, a resource survey may be required by the State Historic Preservation Office prior to surface disturbance;
- b) to the extent feasible and prudent, archaeological, prehistoric, and historic resources shall be protected from significant adverse impacts caused by surrounding uses and activities;
- c) artifacts of significant historic, prehistoric, or archaeological importance shall not be disturbed during project development unless the State Historic Preservation Office and the surface and subsurface landowners, in consultation with the L&PB, approves the action; and,
- d) if previously undiscovered artifacts or areas of historic, prehistoric, or archaeological importance are encountered during development, the State Historic Preservation Office, the surface and subsurface landowners, and the L&PB shall be notified and the site shall be protected from further disturbance pending evaluation by the State Historic Preservation Office.

K. MATERIAL EXTRACTION AND PROCESSING

K-1 Siting of Material Sources

To the extent feasible, prudent and environmentally responsible, sources of sand, gravel, rock and other construction materials shall be authorized in the following sequence:

- a) existing approved gravel pits or quarries operated in compliance with state and federal authorizations;

- b) reuse of material from abandoned development areas, unless reuse could cause more environmental damage than non-use;
- c) new upland sites;
- d) beaches of low habitat values;
- e) streams which do not provide fish habitat;
- f) portions of fish streams which do not provide spawning or overwintering habitat.

K-2 In-stream Material Extraction

Extraction of sand and gravel from stream flood plains shall be located and conducted to avoid changes to channel hydraulics and the potential for channel diversion through the mining site.

K-3 Best Management Practices

In streams and their flood plains which provide habitat for anadromous fish, the following practices shall be incorporated into the siting, design, and operation of mining activities:

- a) clearing of riparian vegetation and disturbance of natural banks shall be minimized;
- b) to the extent feasible and prudent, mining site configurations shall be shaped to blend with physical features and surroundings to provide for diverse riparian and aquatic habitats;
- c) gravel washing operations which discharge effluent to streams shall use settling ponds and recycle treatment waters, as necessary, to comply with state and federal water quality regulations. Settling ponds shall be adequately diked or set-back from active channels to avoid breaching by a 25-year frequency flood. Wash water shall be recycled and the effluent discharge shall comply with state and federal water quality regulations. Effective use of recycled water shall minimize water withdrawal and subsequent discharge of effluent to adjacent lands or waters; and
- d) equipment storage and operation shall be conducted in a manner that does not release fuel and lubricants into the environment.

K-4 Mining In Fish Habitat

Sand and gravel shall not be removed from locations which have been documented to provide spawning or over-wintering habitat for fish.

K-5 Overburden Disposal

Whenever feasible and prudent, overburden in upland areas shall be saved and replaced on the disturbed area to conform to the natural topography as part of the reclamation process. Overburden shall not be disposed of in lakes, within the mean annual flood plain of streams, in wetlands, or below the limit of mean high water in intertidal areas and estuaries.

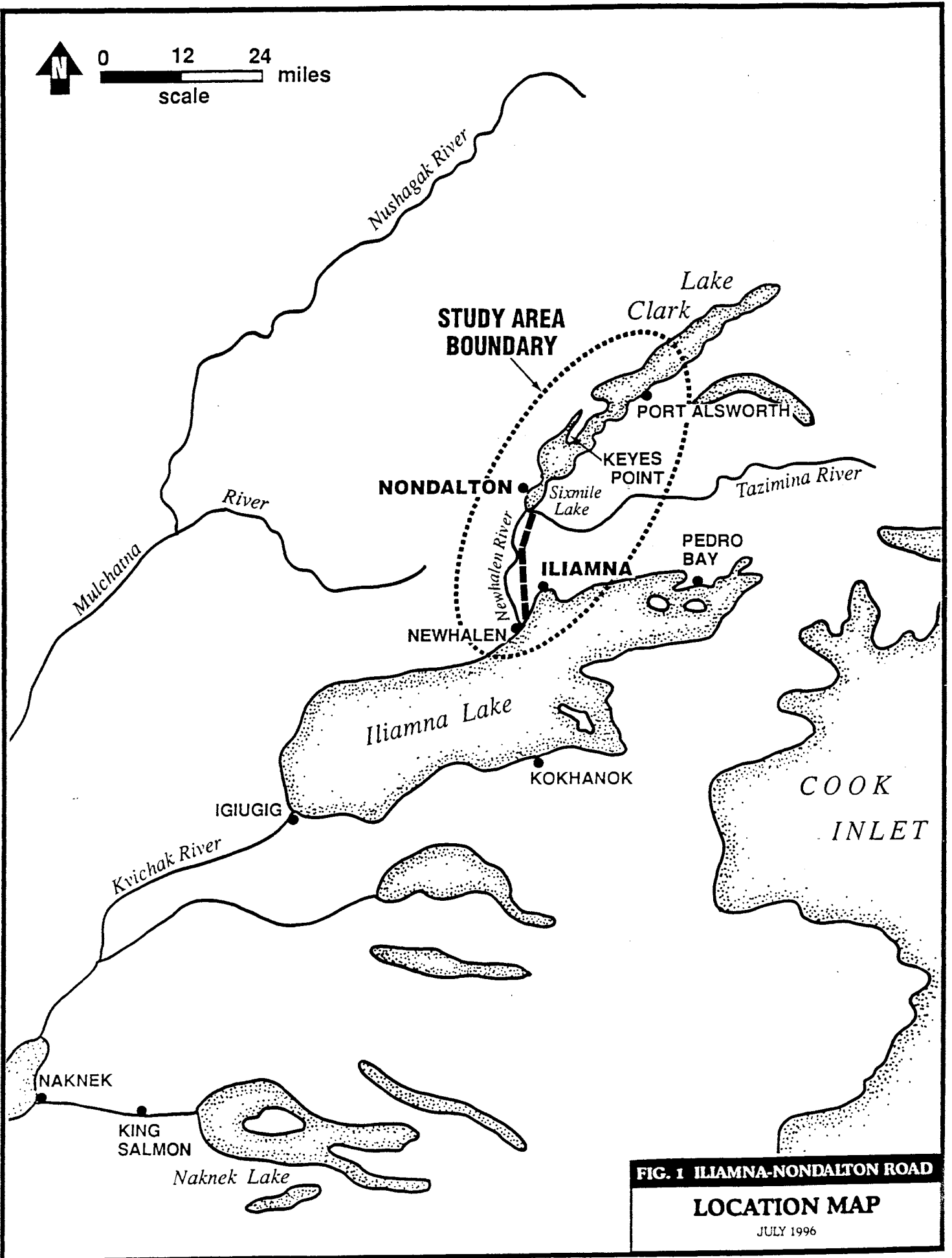
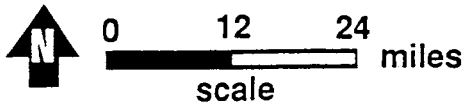
K-6 Reclamation and Restoration

Reclamation of all upland and flood plain mined sites shall be required unless such reclamation would cause greater adverse impact to the environment than leaving the area un-reclaimed. At a minimum, reclamation shall include the following elements, as applicable:

- a) Topsoil and overburden shall be segregated and stored separately above the 25-year flood plain of watercourses.
- b) At the end of each mining season, all disturbed areas shall be regraded to stable slopes. Within mean annual flood plains, regrading to ground contours which will not entrap fish nor significantly alter stream hydraulics shall occur at the end of each operating season. Tailings used in the construction of settling ponds and other essential facilities may be retained in place until completion of their use.
- c) At the completion of mining activities or gravel extraction, all disturbed areas shall be stabilized and re-vegetated, as appropriate. Restoration shall include the following:
 - (1) all disturbed areas shall be graded to stable slopes that blend with the natural topography;
 - (2) erosion control measures shall be implemented as appropriate to stabilize the site;
 - (3) areas designated for re-vegetation shall be covered with topsoil to encourage establishment of native plant species; and

(4) where material sites which are excavated below groundwater may have value as habitat for waterfowl or fish, ADF&G shall be consulted prior to final design of the excavation area.

Excluded from these requirements is the portion of a gravel extraction site required to provide materials for continuing maintenance and operation. Maintenance sand and gravel sites shall comply with the requirements of part b) of this policy.



LEGEND

ILIAMNA-NONDALTON RD.

- Existing Road (resurface only)
- - - Existing Road (to be improved and resurfaced)
- Existing Pioneer Road (to be reconstructed)

PROPOSED COMINCO PEBBLE MINING SITE (APPROX. 12 MI.)



0 1
SCALE IN MILES (approximate)

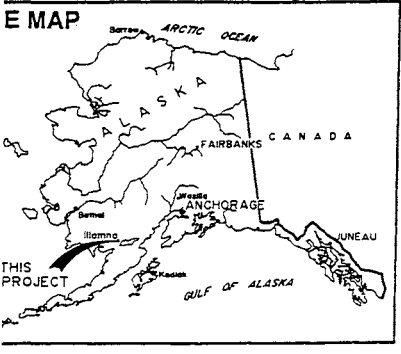
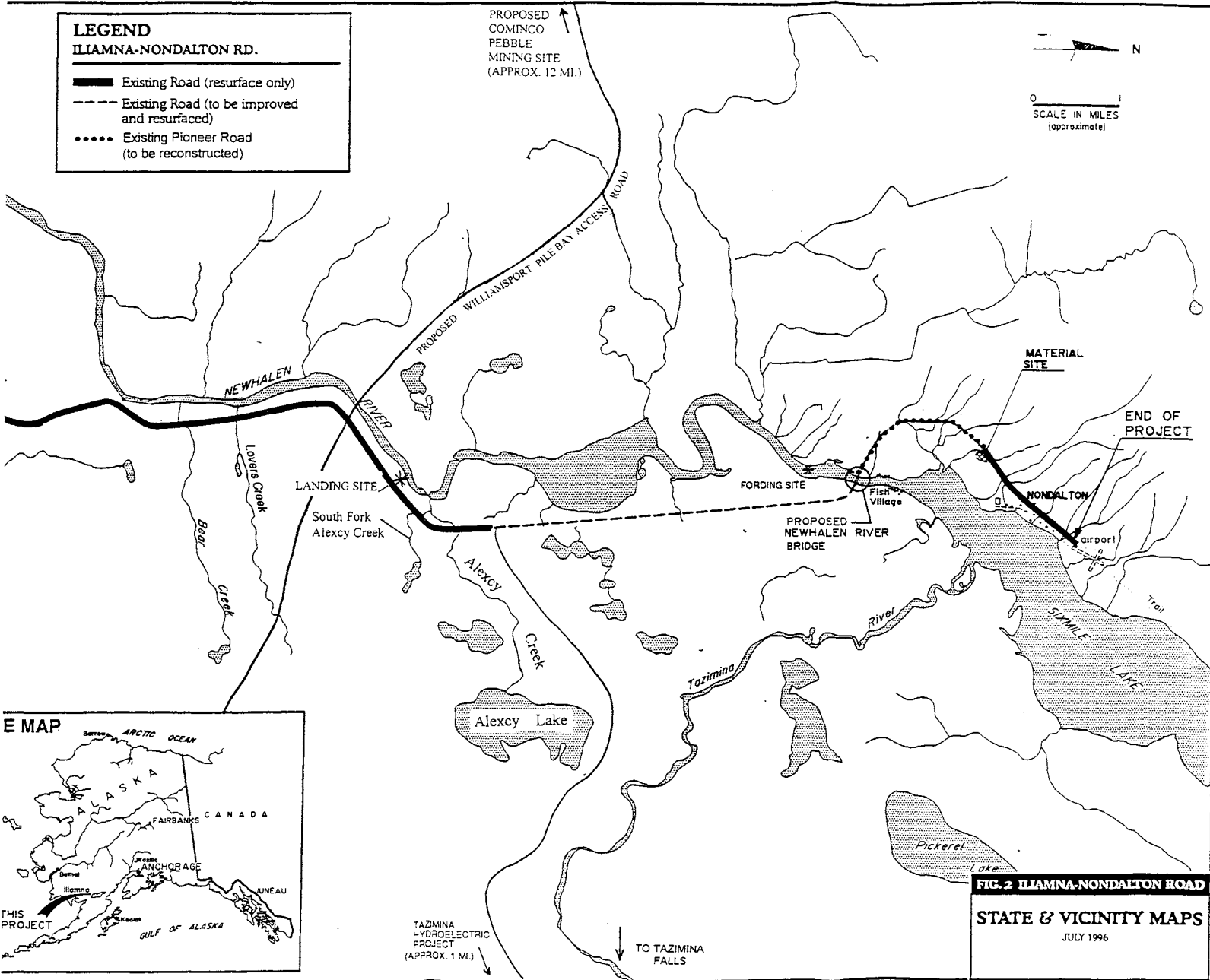






FIG. 2 ILIAMNA-NONDALTON ROAD STATE & VICINITY MAPS
JULY 1996

FIG. 3 ILIAMNA-NONDALTON ROAD

VICINITY MAP

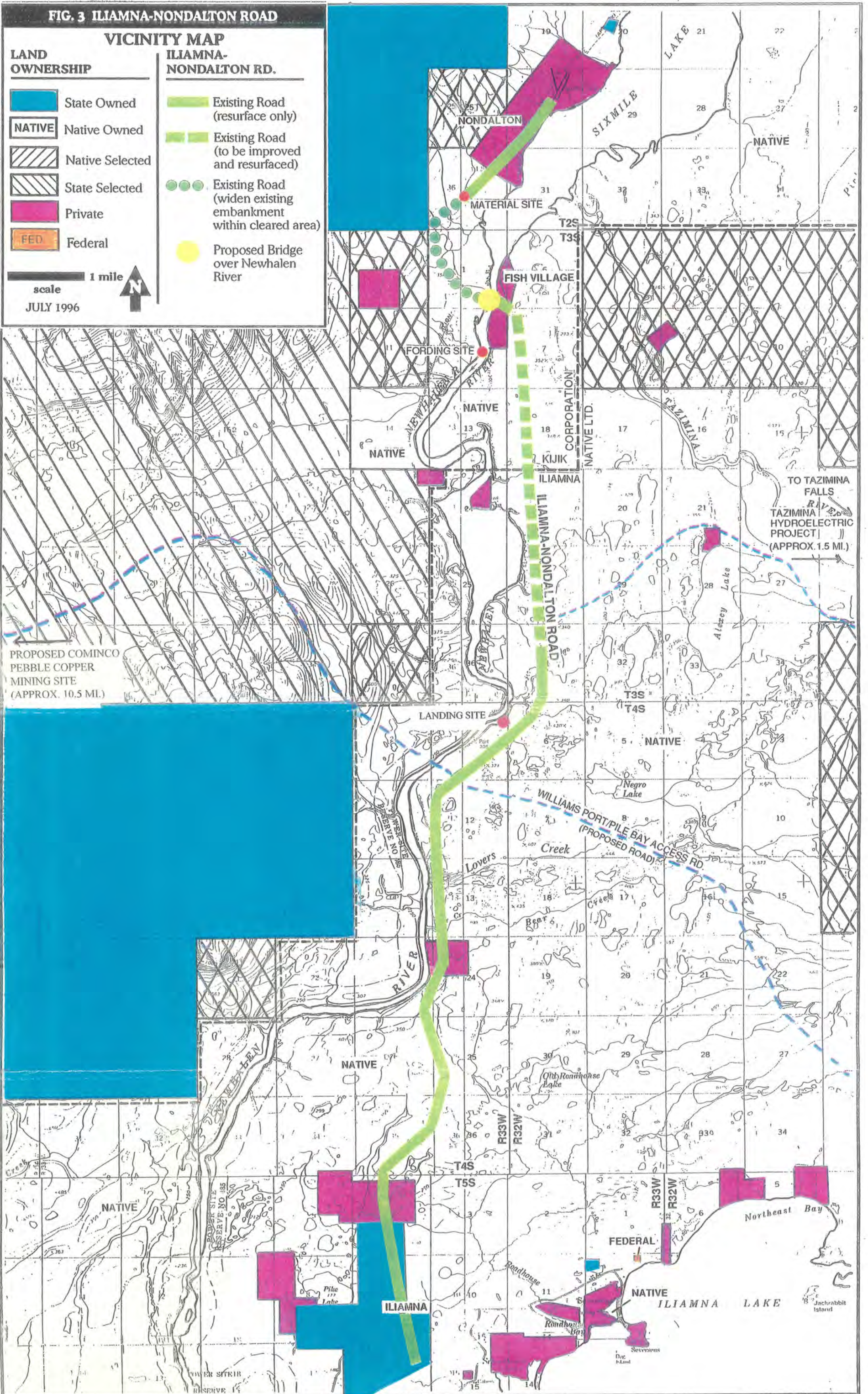
LAND OWNERSHIP

-  State Owned
-  Native Owned
-  Native Selected
-  State Selected
-  Private
-  Federal

ILIAMNA-NONDALTON RD.

-  Existing Road (resurface only)
-  Existing Road (to be improved and resurfaced)
-  Existing Road (widen existing embankment within cleared area)
-  Proposed Bridge over Newhalen River

scale 1 mile
JULY 1996



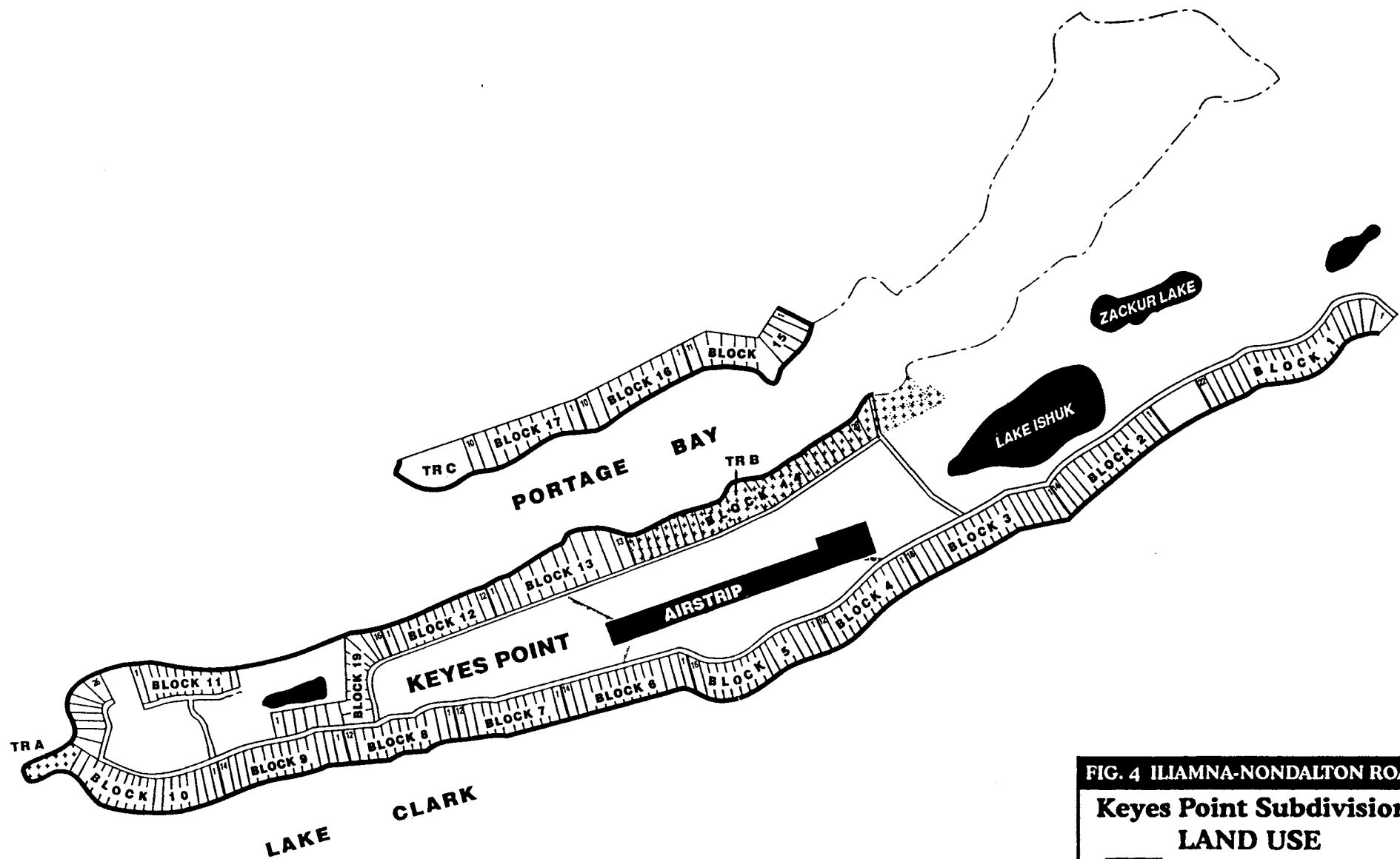




FIG. 4 ILIAMNA-NONDALTON ROAD

**Keyes Point Subdivision
LAND USE**

-  Commercial
-  Residential/Undefined

JULY 1996

APPENDIX C

APPENDIX C

COE Section 404/10 Permit.....	C-1
USCG Section 9 Permit Application	C-13
DGC Final Consistency Determination	C-41
ADF&G Title 16 Permit	C-59
L&PB Development Permit	C-67
ADNR Easement Permit	C-69

COE Section 404/10 Permit



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 898
ANCHORAGE, ALASKA 99506-0898

RECEIVED

MAR 19 '00

MARCH 16 2001

Regulatory Branch
North Section
2-830477

Mr. Jerry O. Ruehle
Alaska Department of Transportation and Public Facilities
4111 Aviation Way
Post Office Box 196900
Anchorage, Alaska 99519-6900

Dear Mr. Ruehle:

Enclosed is the signed Department of the Army permit, file number 2-830477, Newhalen River 4 authorizing work on the Nondalton to Iliamna roadway near Nondalton, Alaska. Also enclosed is a Notice of Authorization, which should be posted in a prominent location near the authorized work.

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

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

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

Please contact me at (907) 753-2716; or by mail at the address above, if you have questions.

Sincerely,


Victor O. Ross
Project Manger

Enclosures

Project Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr. JD	X	
Enr. Coord.		
Enr. Team Leader		
Staff SW	X	
CS		X
Hydrologist		
Project	X	
Contract	X	

51951

DEPARTMENT OF THE ARMY PERMIT

Permittee Alaska Department of Transportation and Public Facilities

Permit No. 2-830477, Newhalen River 4

Issuing Office U.S. Army Engineer District, Alaska

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

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

Project Description : Construct a bridge 653 feet long with a width of 19 feet over the Newhalen River. In addition, a boat launch would be constructed alongside the west bridge abutment. Piers in the Newhalen River would support the bridge. An additional 136 cubic yards of fill would be placed below the ordinary high water of the Newhalen River from abutment #1. Rehabilitate 14.4 miles of existing road from Iliamna to the Newhalen River. From the Newhalen River to Nondalton, improve an existing 1.7 miles of ATV trail, and connect to an existing 0.6-mile road to Nondalton. The road construction including the culvert crossings will discharge 44,000 cubic yards of fill into waters of the United States, including wetlands. A total of 4.3 acres of wetlands will be filled by the proposed action.

All work will be performed in accordance with the attached plans, 4 sheets dated December 14, 1999.

Project Location : Within section 1, T. 3 S., R. 33 W., Seward Meridian, located between the communities of Iliamna and Nondalton, Alaska

Permit Conditions:

General Conditions:

1. The time limit for completing the work authorized ends on September 30, 2003. If you find that you need more time to complete the authorized activity, submit your request for a time extension to this office for consideration at least one month before the above date is reached.
2. You must maintain the activity authorized by this permit in conformance with the terms and conditions of this permit. You are not relieved of this requirement if you abandon the permitted activity, although you may make a good faith transfer to a third party in compliance with General Condition 4 below. Should you wish to cease to maintain the authorized activity or should you desire to abandon it without a good faith transfer, you must obtain a modification of this permit from this office, which may require restoration of the area.
3. If you discover any previously unknown historic or archeological remains while accomplishing the activity authorized by this permit, you must immediately notify this office of what you have found. We will initiate the Federal and state coordination required to determine if the remains warrant a recovery effort or if the site is eligible for listing in the National Register of Historic Places.

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

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

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

- a. You fail to comply with the terms and conditions of this permit.
- b. The information provided by you in support of your permit application proves to have been false, incomplete, or inaccurate (See 4 above).
- c. Significant new information surfaces which this office did not consider in reaching the original public interest decision.

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

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

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

Carol P. Sauner
(PERMITTEE) AND TITLE

March 5, 2001
(DATE)

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

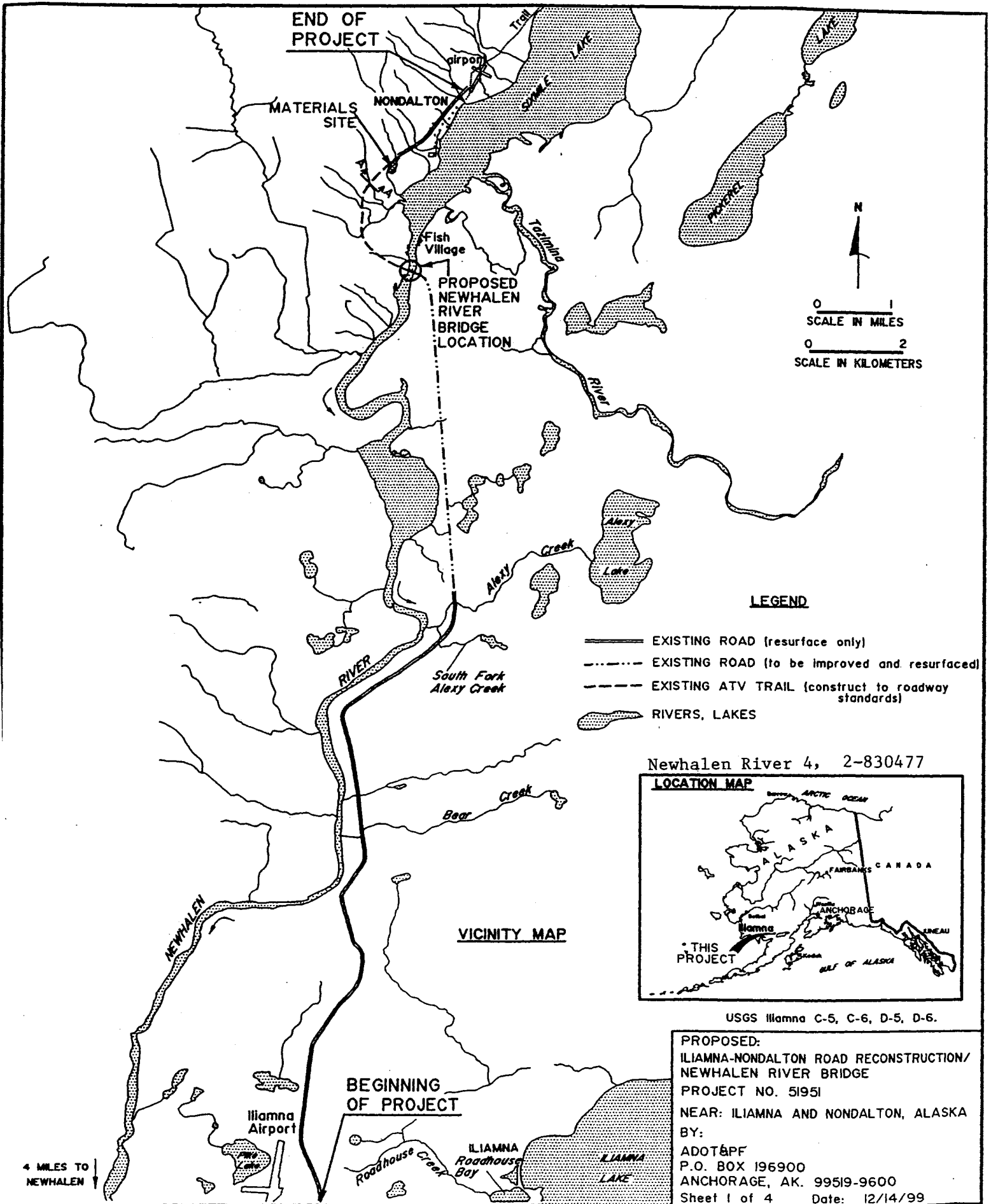
FOR: Victor O. Ross
(DISTRICT ENGINEER) Col Steven T. Perrenot
VICTOR O. ROSS, PROJECT MANAGER
NORTH SECTION, REGULATORY BRANCH

March 14 2001
(DATE)

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

(TRANSFEREE)

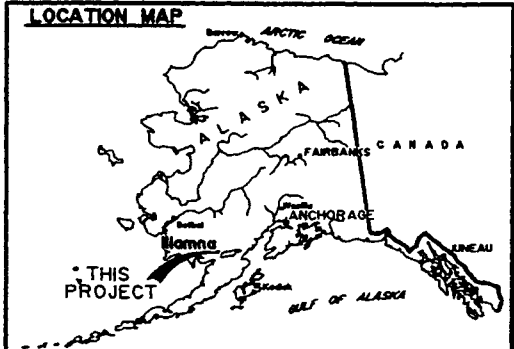
(DATE)



LEGEND

- EXISTING ROAD (resurface only)
- - - EXISTING ROAD (to be improved and resurfaced)
- - - EXISTING ATV TRAIL (construct to roadway standards)
- ▭ RIVERS, LAKES

Newhalen River 4, 2-830477

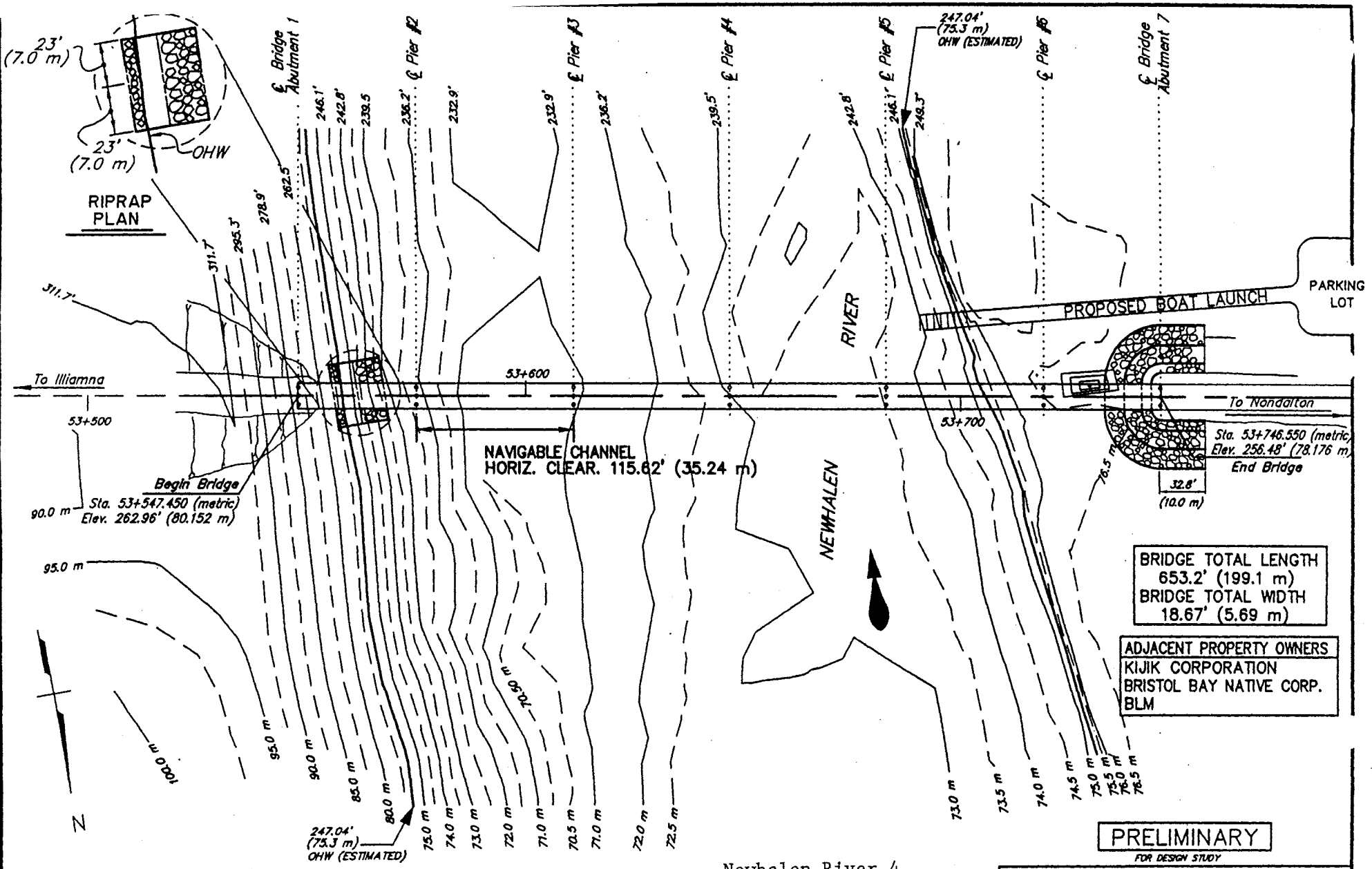


VICINITY MAP

USGS Iliamna C-5, C-6, D-5, D-6.

PROPOSED:
 ILIAMNA-NONDALTON ROAD RECONSTRUCTION/
 NEWHALEN RIVER BRIDGE
 PROJECT NO. 51951
 NEAR: ILIAMNA AND NONDALTON, ALASKA
 BY:
 ADOT&PF
 P.O. BOX 196900
 ANCHORAGE, AK. 99519-9600
 Sheet 1 of 4 Date: 12/14/99

4 MILES TO NEWHALEN



BRIDGE TOTAL LENGTH
653.2' (199.1 m)
BRIDGE TOTAL WIDTH
18.67' (5.69 m)

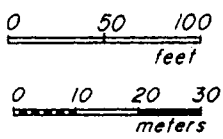
ADJACENT PROPERTY OWNERS
KIKI CORPORATION
BRISTOL BAY NATIVE CORP.
BLM

PRELIMINARY
FOR DESIGN STUDY

Newhalen River 4
2-830477

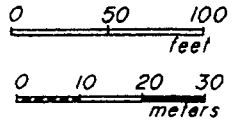
HYDRAULIC & HYDROLOGIC SUMMARY						
	ENGLISH			METRIC		
	Q _{2.33}	Q ₅₀	Q ₁₀₀	Q _{2.33}	Q ₅₀	Q ₁₀₀
Recurrence Interval	0.43	0.02	0.01	0.43	0.02	0.01
Exceedance Probability	2.33	50	100	2.33	50	100
Drainage Area:	3,500 sq. miles			906,496 hectares		
Design Discharge	25,084 cfs	41,282 cfs	44,708 cfs	710 cms	1,169 cms	1,266 cms
Design High Water Elevation	247.04'	250.33'	250.98'	75.3 m	76.3 m	76.5 m
Minimum Clearance (Span 2)	14.27'	10.99'	10.33'	4.35 m	3.35 m	3.15 m
Datum = MSL						

BRIDGE
PLAN



PROPOSED:
ILIAMNA-NONDALTON ROAD RECONSTRUCTION/
NEWHALEN RIVER BRIDGE
PROJECT NO. 51951
NEAR: ILIAMNA AND NONDALTON, ALASKA
BY:
ADOT&PF
P.O. BOX 196900
ANCHORAGE, AK. 99519-9600
Sheet 2 of 4 Date: 12/14/99

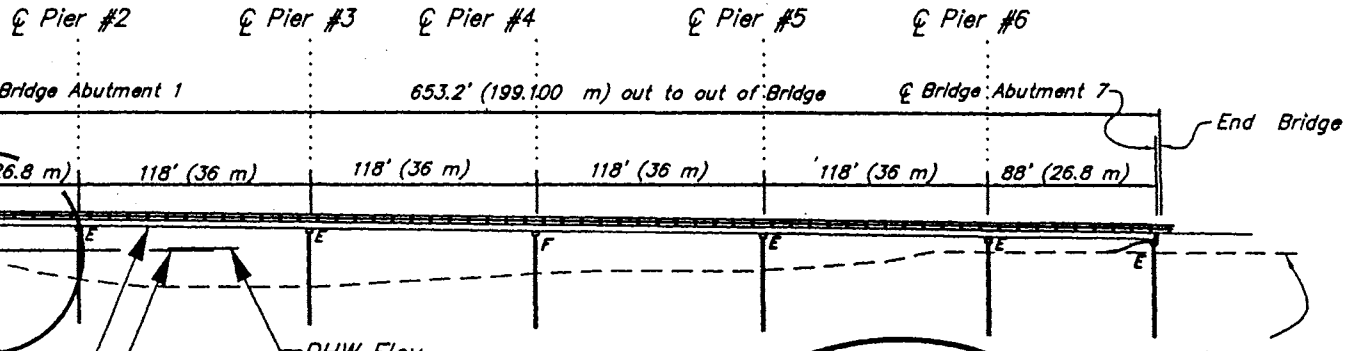
BRIDGE ELEVATION



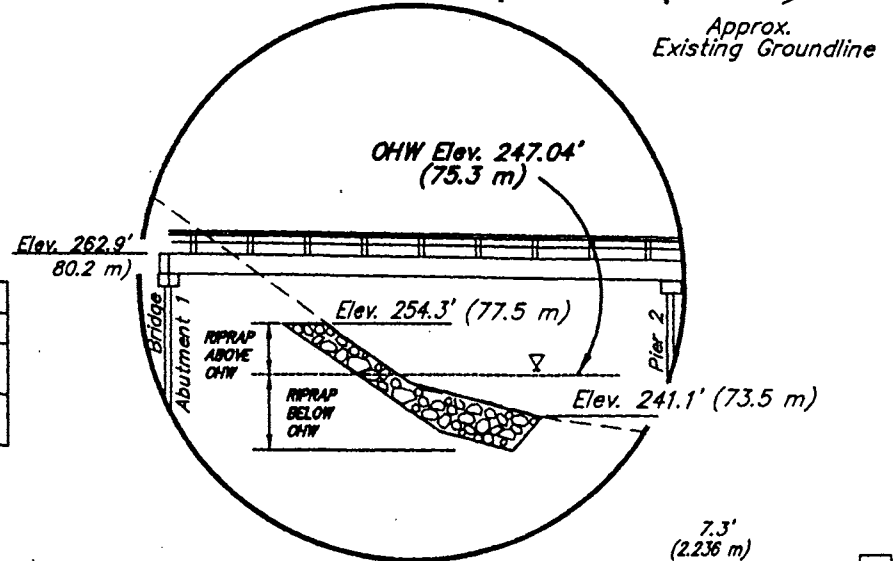
Datum (MSL) = 229.6' (70.0 m)

SPAN #2

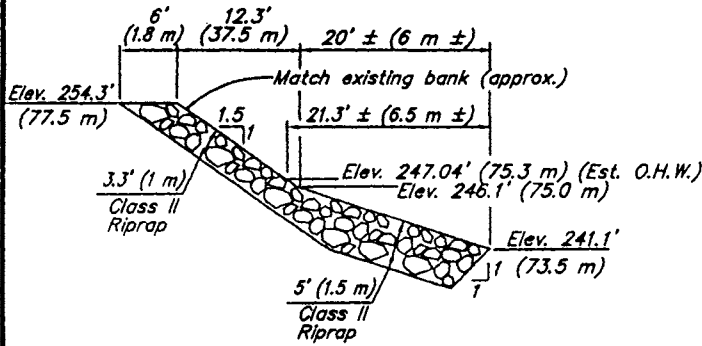
NAVIGABLE CHANNEL
 HORIZ. CLEAR. 115.62' (35.24 m)
 VERT. CLEAR. AT Q_{2.33} 14.27' (4.35 m)
 LOW CORD ELEVATION 261.32' (79.65 m)



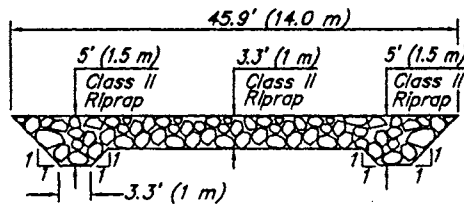
DHW Elev. 250.33' (76.30 m)
 OHW Elev. 247.04' (75.30 m)
 ESTIMATED, NOT SURVEYED



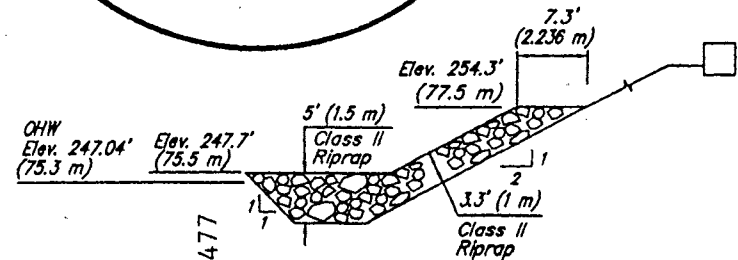
Abutment 1	
Fill Volume	0.0 CY
Riprap Volume Above OHW	19.7 CY
Riprap Volume Below OHW	136.0 CY



RIPRAP DETAIL @ ABUTMENT 1



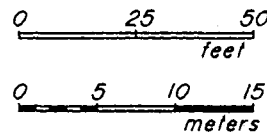
RIPRAP SECTION PERPENDICULAR TO FACE ABUTMENT 1



RIPRAP DETAIL @ ABUTMENT 7

SITE CONDITIONS		
	ENGLISH (ft.)	METRIC (m)
Minimum Channel Elevation	231.95	70.70
Low Cord Elevation @ Span 2	261.32	79.65
Width Face to Face of Piers @ Span 2	115.62	35.24

Datum = MSL

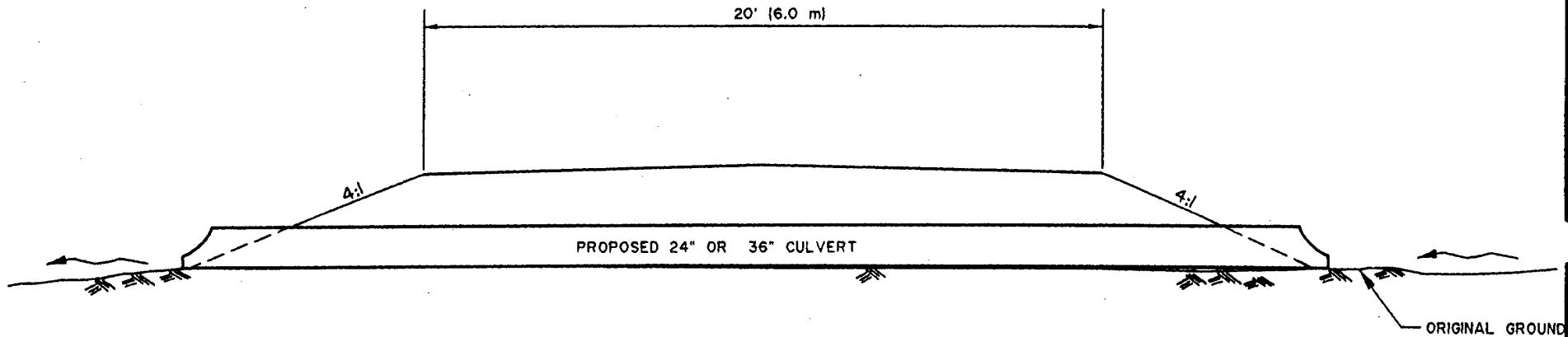


PRELIMINARY
 FOR DESIGN STUDY

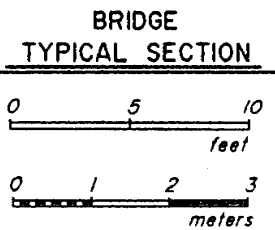
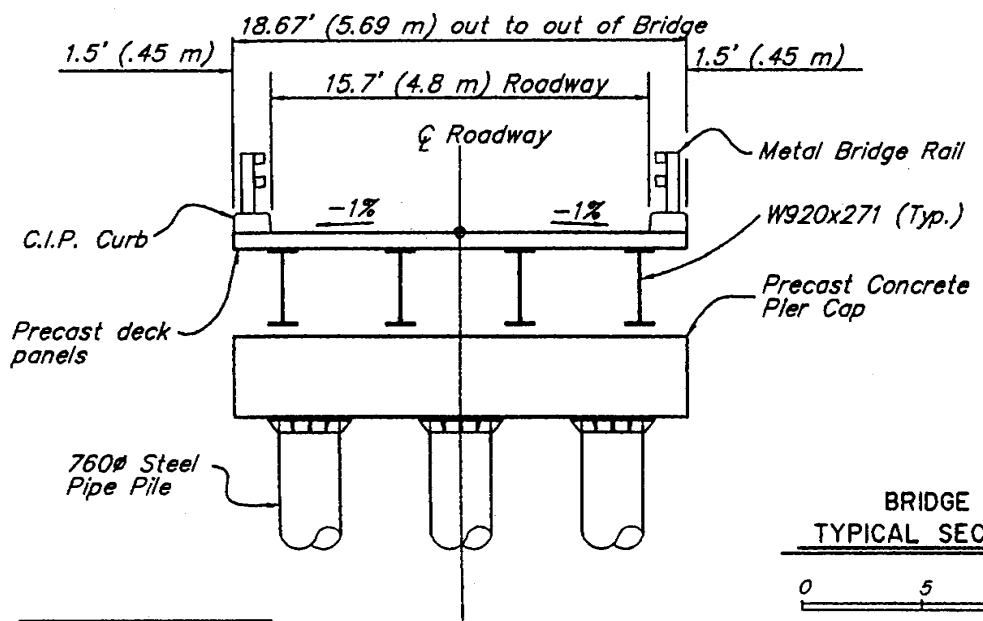
Newhalen River 4, 2-830477

PROPOSED:
 ILIAMNA-NONDALTON ROAD RECONSTRUCTION/
 NEWHALEN RIVER BRIDGE
 PROJECT NO. 51951
 NEAR: ILIAMNA AND NONDALTON, ALASKA
 BY:
 ADOT&PF
 P.O. BOX 196900
 ANCHORAGE, AK. 99519-9600
 Sheet 3 of 4 Date: 12/14/00

C-7



TYPICAL SECTION OF ATV TRAIL IMPROVEMENT
SECTION A - A (SHEET II) NOT TO SCALE



Newhalen River 4, 2-830477

PROPOSED:
ILIAMNA-NONDALTON ROAD RECONSTRUCTION/
NEWHALEN RIVER BRIDGE
PROJECT NO. 5195I
NEAR: ILIAMNA AND NONDALTON, ALASKA
BY:
ADOT&PF
P.O. BOX 196900
ANCHORAGE, AK. 99519-9600
Sheet 4 of 4 Date: 12/14/99

PRELIMINARY
FOR DESIGN STUDY



**This notice of authorization must be
conspicuously displayed at the site of work.**

United States Army Corps of Engineers
Newhalen River 4

MARCH 16 2001
2001

CONSTRUCT A NEW BRIDGE OVER NEWHALEN RIVER; REHABILITATE 14.4 MILES OF
ROAD AND ATTENDANT DRAINAGES FROM ILIAMNA TO THE NEWHALEN RIVER.
A permit to IMPROVE 1.7 MILES OF ATV TRAIL FROM THE RIVER TO NONDALTON.

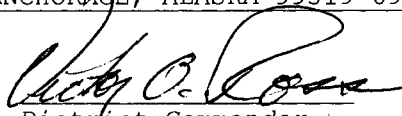
at NONDALTON ALASKA

has been issued to ALASKA DEPARTMENT OF TRANSPORTATION on MARCH 16 2001

Address of Permittee POST OFFICE BOX 196900, ANCHORAGE, ALASKA 99519-6900

Permit Number

2-830477


FOR: District Commander
VICTOR O. ROSS
PROJECT MANGER
NORTH SECTION

ENG FORM 4336, Jul 81 (33 CFR 320-330) EDITION OF JUL 70 MAY BE USED (Proponent: CECW-O)

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF AIR AND WATER QUALITY
NON-POINT SOURCE WATER POLLUTION CONTROL

UOR
TONY KNOWLES, GOVERNOR

555 Cordova Street
Anchorage, AK 99501-2617
Phone: (907) 269-7564
Fax: (907) 269-7508
TTY: (907) 269-7511
<http://www.state.ak.us/dec/>

February 27, 2001

Return Receipt Z 526 022 576

Carol Sanner
ADOT/PF, Environmental
PO Box 196900
Anchorage, AK 99519

Subject: Newhalen River 4, NPACO No. 2-830477
State I.D. No. AK 0002-12AA

Dear Ms. Sanner:

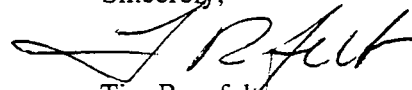
In accordance with Section 401 of the Federal Clean Water Act of 1977 and provisions of the Alaska Water Quality Standards, the Department of Environmental Conservation is issuing the enclosed Certificate of Reasonable Assurance for the proposed construction of a roadway and bridge, within wetlands located between Iliamna and Nondalton, Alaska.

This certification is one of the approvals required as part of a coastal management consistency determination issued by the Division of Governmental Coordination under AAC 50.070.

Department of Environmental Conservation regulations provide that any person who disagrees with any portion of this action may request an adjudicatory hearing in accordance with 18 AAC 15.200-920. This request should be mailed to the Commissioner of the Alaska Department of Environmental Conservation, 410 Willoughby Avenue, Suite 105, Juneau, Alaska 99801-1795. Please also send a copy of the request for hearing to the undersigned. Failure to submit a hearing request within thirty days of receipt of this letter constitutes a waiver of that person's right to judicial review of this action.

By copy of this letter we are advising the Corps of Engineers and the Division of Governmental Coordination of our actions and enclosing a copy of the certification for their use.

Sincerely,


Tim Rumpf
Environmental Specialist

RECEIVED

MAR 2001

REGULATORY BRANCH
Alaska District, Corps of Engineers

Enclosure

CC: (with encl.)

✓ Victor Ross, Corps of Engineers
F&WS

Maureen McCrea, DGC Anchorage

EPA, AK. Operations

ACMP, DNR/DOL

ADF&G Habitat. Anchorage

"Clean Air, Clean Water"

STATE OF ALASKA
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
CERTIFICATE OF REASONABLE ASSURANCE

A Certificate of Reasonable Assurance, in accordance with Section 401 of the federal Clean Water Act and the Alaska Water Quality Standards, is issued to the Alaska Department of Transportation and Public Facilities, PO Box 196900, Anchorage, Alaska 99519, for the construction of a roadway with bridge, within 4.3 acres of wetlands.

The proposed activity is located within section 1, T3S, R33W, Seward Meridian, between the communities of Iliamna and Nondalton, Alaska.

Public notice of the application for this certification was given as required by 18 AAC 15.180.

Water Quality Certification is required under Section 401 because the proposed activity will be authorized by a Corps of Engineers permit identified as Newhalen River 4, NPACO No. 2-830477 and a discharge may result from the proposed activity.

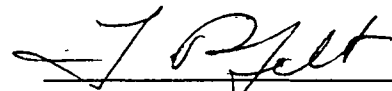
Having reviewed the application and comments received in response to the public notice, the Alaska Department of Environmental Conservation certifies that there is reasonable assurance that the proposed activity, as well as any discharge which may result, will comply with applicable provisions of Section 401 of the Clean Water Act, the Alaska Water Quality Standards, 18 AAC 70, and the Standards of the Alaska Coastal Management Program, 6 AAC 80, provided that the following stipulations are adhered to. These stipulations were adopted pursuant to 6 AAC 50 (Project Consistency with the Alaska Coastal Management Program) and are necessary to ensure that your project is consistent with the ACMP:

1. Each bank cut, slope, fill, bottom of road side ditch; and exposed earth work attributable to the project, especially during culvert installation and road building activities and at the east approach at the Newhalen river bridge, shall be stabilized to prevent erosion from occurring both during and after project construction.
2. DOT/PF shall install silt fences or implement other methods as necessary to filter or settle suspended sediment from drainage wastewater from roadway construction prior to direct or indirect discharge into existing surface waters or wetlands. The structure shall be maintained until the disturbed or deposited material has been stabilized against erosion. Special attention shall be given to collection and treatment of road embankment, road cut, and road surface runoff to the road-side ditches located at the bridge approach on the east side of the Newhalen River. This stipulation covers the construction phase and the roadways permanent design.

“Clean Air, Clean Water”

3. Adequate sorbent materials (i.e. material that collects or absorbs petroleum products while at the same time repels water) shall be kept on site to contain and cleanup any spill of petroleum products.
4. The ability of all persons to use or access state land or public water shall not be restricted in any way.

Date 2/27/01



Tim Rumfelt
Environmental Specialist

USCG Section 9 Permit Application



U.S. Department
of Transportation
**Federal Highway
Administration**

Alaska Division

www.fhwa.dot.gov/akdiv

P.O. Box 21648
Juneau, Alaska 99802
907-586-7418

January 13, 2000

STP-0214(3)/51951

U.S. Coast Guard
17th Coast Guard District
Commander
Attn: Mr. Jim Helfinstine
P.O. Box 25517
Juneau, AK 99802-5517

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages ▶ 3

To <i>Caryl Sanner</i>	From <i>Aaron</i>
Dept./Agency	Phone # <i>586-2427</i>
Fax # <i>243-6927</i>	Fax #

Dear Mr. Helfinstine:

In accordance with the Agreement for the Coordination of USCG Permits in the State of Alaska (Agreement), we are submitting an application for a Section 9 Bridge Permit for a new bridge to be constructed over the Newhalen River. The steel girder bridge will be constructed approximately 20 miles above the mouth of the waterway, located within the SE ¼ Section 1, T3S, R33W, Seward Meridian, near the community of Nondalton.

The purpose of the project is to provide a year round road system connection between the communities of Iliamna, Nondalton, and Newhalen. Currently, there is no bridge across the Newhalen River. Goods and people must fly between the communities in summer or go by snowmobile in winter, fording the frozen river.

Existing commerce on the Newhalen River consists of small craft such as outboard motor driven boats, an occasional barge, and large motor boats exceeding 21 feet in length. Consistent with that level of use, the Newhalen River is classified by the USCG as navigable. Since the project will be largely funded by the Federal Highway Administration, FHWA concurs that the Newhalen River is a Category 3 Waterway.

The bridge will be a one-lane continuous, steel girder bridge with a precast deck panel system. It will have six spans (two abutments and four piers below ordinary high water (OHW)), 653 feet long and 18.67 feet wide. All the piers will be wet during a 100 year or greater flood event. Preliminary bridge design sheets showing plan, elevation, and cross-sectional views are enclosed. Note the elevation of low steel is 261.32 feet, and that of OHW (or bank full stage) is 247.04 ft. Span 2 between piers 2 and 3 is located above the deepest channel in the river.

The use of a flexible float system or barge mounted pile driving operation is expected for bridge construction.

In addition to the new bridge, a boat launch is proposed alongside the south side of the west bridge approach. Furthermore, the project will rehabilitate an existing 14.4 mile road from Iliamna to the Newhalen River and reconstruct a 1.7 mile ATV Trail from the Newhalen River to connect to an existing road leading to Nondalton. All will be situated within ADOT&PF owned right-of-way. Road improvements include reconstruction of the roadway base, resurfacing with gravel, installation of culverts and ditches, and bank stabilization to prevent erosion. Construction is scheduled to begin approximately Fall, 2000 and should be completed in two years.

Because FHWA is funding the project, NEPA documentation has been prepared in accordance with FHWA guidelines under 23 CFR Part 771. Under separate cover, a copy of the public review, *Environmental Assessment for the Iliamna-Nondalton Road Improvements*, will be transmitted to your office as soon as the Corps submits a copy of its Public Notice for inclusion in the document.

There are no wildlife refuges, designated recreational areas, public parks or historic sites in the vicinity of the bridge project. However, other permits required for this project are :

1. Department of the Army Section 404/10 for bridge construction and fill in wetlands associated with the road upgrade;
2. Title 16 permit from the Alaska Department of Fish and Game for in water work in the Newhalen River, as well as for culvert replacements in several fish streams along the road;
3. Coastal Consistency Review and Section 401 Water Quality Certification, in conjunction with the DA permit;
4. and a Lake and Peninsula Borough Development Permit.

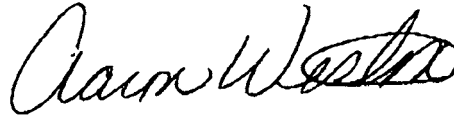
Since the issuance of certain permits or approvals is predicated on issuance of others, we will forward those permits to you when they have been obtained. The Lake and Peninsula Borough indicates all other permits must be received before it can issue its Development Permit. However, we hope to be able to obtain that permit first, so it can be submitted to you with the others.

We appreciate your cooperation and efforts in assisting us in the application process. If you have questions or need additional information, please call Carol Jo Sanner, AKDOT&PF Permits

Officer at 907-269-0531 or Susan Wick, AKDOT&PF Environmental Team Leader at 907-269-0530.

Sincerely,

Stephen A. Moreno
Division Administrator



By: Aaron Weston, PE
FHWA Field Engineer

Enclosures:

- Signed USCG Bridge Permit Application
- Original and three copies of vicinity map and plan drawings
- Adjacent land owners contact list and right of way plat
- Copies of Corps, ADF&G Title 16, Coastal project Questionnaire, and Lake and Peninsula Borough Development Permit applications
- Hydraulic/Hydrology Report for Newhalen River Bridge
- Newhalen River Bridge Type Selection Report

cc: Susan Wick, Environmental Team Leader

RECEIVED

JAN 13 '00

Permit Design & Environmental Section	Copy	ACTION
PD&E Engr		
Project Mgr	✓	
Env. Coord.		
Env. Team Leader		X
Staff		
CS	X	
Hydrologist		
Project File	X	
Central File	X	

Dickerson

SW

Project #5195

COAST GUARD

BRIDGE PERMIT APPLICATION

1. Application Number 2. Date

3. Name, Address and Zip Code of Applicant's Authorized Agent 4. Name, Address of Applicant

**Alaska Dept. of Transportation
& Public Facilities
Box 196900
Anchorage, AK 99519-6900**

Same

Contact: Carol Jo Sanner, Permits Officer

Telephone Number Telephone Number
(907) 269-0531 e-mail: carol_sanner@dot.state.ak.us

5. Location of Project
Newhalen River, between Sixmile Lake and Lake Iliamna at approx. SE ¼ Section 1, T3S, R33W, Seward Meridian, USGS Quad: Iliamna, D-5/ Site is approx. 2.2 statute miles downstream of Nondalton and 7.4 statute miles upstream of USGS stream gage No. 153000000.

6. Describe proposed project

The proposed project would construct a new 6 span bridge, 653.2 feet long and 18.67 feet wide (a single, 15.75 ft wide travel lane) across the Newhalen River. The bridge will be constructed from precast concrete deck panels on steel W-beams. The substructure units are three pile bents, consisting of precast pier caps on 30 inch diameter steel pipe piles. There will be four piers in the flowing channel (numbers 2,3,4,5). Abutment 1, Pier 6 and Abutment #7 will lie above ordinary high water (OHW), but within the 100 year floodplain. Abutment #1 requires riprap scour protection, the toe of which will encroach upon the flowing channel. Riprap scour protection for Abutment #7 lies above OHW.

7. Purpose of project
Purpose is to link the two communities of Iliamna and Nondalton with a year round road for safety, commerce and community development.

8. Existing structure
a. None to be modified to be removed
b. Owner of bridge: AK Dept. of Transportation & Public Facilities
c. Extent of removal: N/A

COAST GUARD
BRIDGE PERMIT APPLICATION

9. Proposed commencement of construction (date) Fall, 2000

Proposed completion of construction (date): Fall, 2002

10. Primary authority

state permit charter ownership of land

11. Water Quality Certificate

applied for on applied for concurrent with Dept. of the Army Section 404/10

granted waived

12. Environmental document prepared by ADOT&PF

An Environmental Assessment will be distributed for 30 day public review when Corps Public Notice is published. When the Final EA and Finding of No Significant Impact are signed by Federal Highway Administration, we will forward them to you.

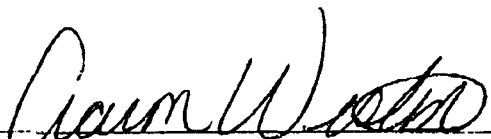
13. Are there any wildlife and waterfowl refuges or recreation area, public parks, historical or archaeological sites in the vicinity of the proposed project?

yes no

14. List all other approvals or permits required for the project:

<u>Agency</u>	<u>Permit Number</u>	<u>Date of Application</u>	<u>Date Approved</u>
U.S. Army Corps of Engineers	Section 404/10		(Pending)
AK Dept. of Fish & Game	Title 16 Permit		(Pending)
Alaska Coastal Consistency Review			(Pending)
Lake and Peninsula Borough	Development Permit		(Pending)

15. Application is hereby made for Coast Guard approval of construction of the project described herein. I agree to provide any additional information/data that may be necessary to provide reasonable assurance that the proposed bridge will provide for the reasonable needs of navigation with minimal impact upon the environment. I certify that all statements are true, complete and correct to the best of my knowledge and belief.

 1-13-00
Signature of applicant Date

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

To: Carol

From: Mason

Dist. # 5867427

Fax # 243-6927

GENERAL SERVICES ADMINISTRATION

**LAND OWNERSHIP
PROPOSED NEWHALEN RIVER BRIDGE**

As shown on the attached State of Alaska plat, the areas outlined in blue are owned by the Nondalton Native Corporation (Kijik Corporation, surface estate) and the Bristol Bay Native Corporation (subsurface estate). The parcel outlined in green is owned by the federal government (BLM). The entire bridge installation will be done within the right-of-way owned by the State of Alaska Department of Transportation & Public Facilities. The ownership of this right-of-way is evidenced by the attached Grant # AA-8791, dated March 16, 1976.

ADDRESSES:

Kijik Corporation

ATTN: Greg O'Keefe
4155 Tudor Ctr. Drive
Suite 104
Anchorage, AK 99508

Bristol Bay Native Corporation

ATTN: John Moores
P.O. Box 100220
Anchorage, AK 99510

Bureau of Land Management

Alaska State Office
222 W. 7th Avenue, Box 13
Anchorage, AK 99513-7599



UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
State Office
555 Cordova Street
Anchorage, Alaska 99501

IN REPLY REFER TO
2800 (34)
AA-8791
52A-2910
Project No.
S-0214(1)
Newhalen to
Nondalton
Parcels Nos.
2, 4, 5, 6, and

ASO 2800-1
Rev. May 70

DECISION

RIGHT-OF-WAY GRANTED

MAR 16 1976

Details of Grant

Serial number of grant AA-8791

Name of grantee State of Alaska
Department of Highways
5700 Tudor Road
P.O. Box 3369
Anchorage, Alaska 99508

Map showing the location and dimensions of grant:

Map designations See attached maps
Project No. S-0214(1)

Date filed July 22, 1974

Permitted use by grantee Federal Aid Secondary Highway

Authority for grant Act of August 27, 1953 (72 Stat. 385,
23 U.S.C. 317)

Regulations applicable to grant:

Code reference 43 CFR Part 2801, 2802, 2821, and
43 CFR Part 17

Date of grant MAR 16 1976

Expiration date of grant N/A

Rental:

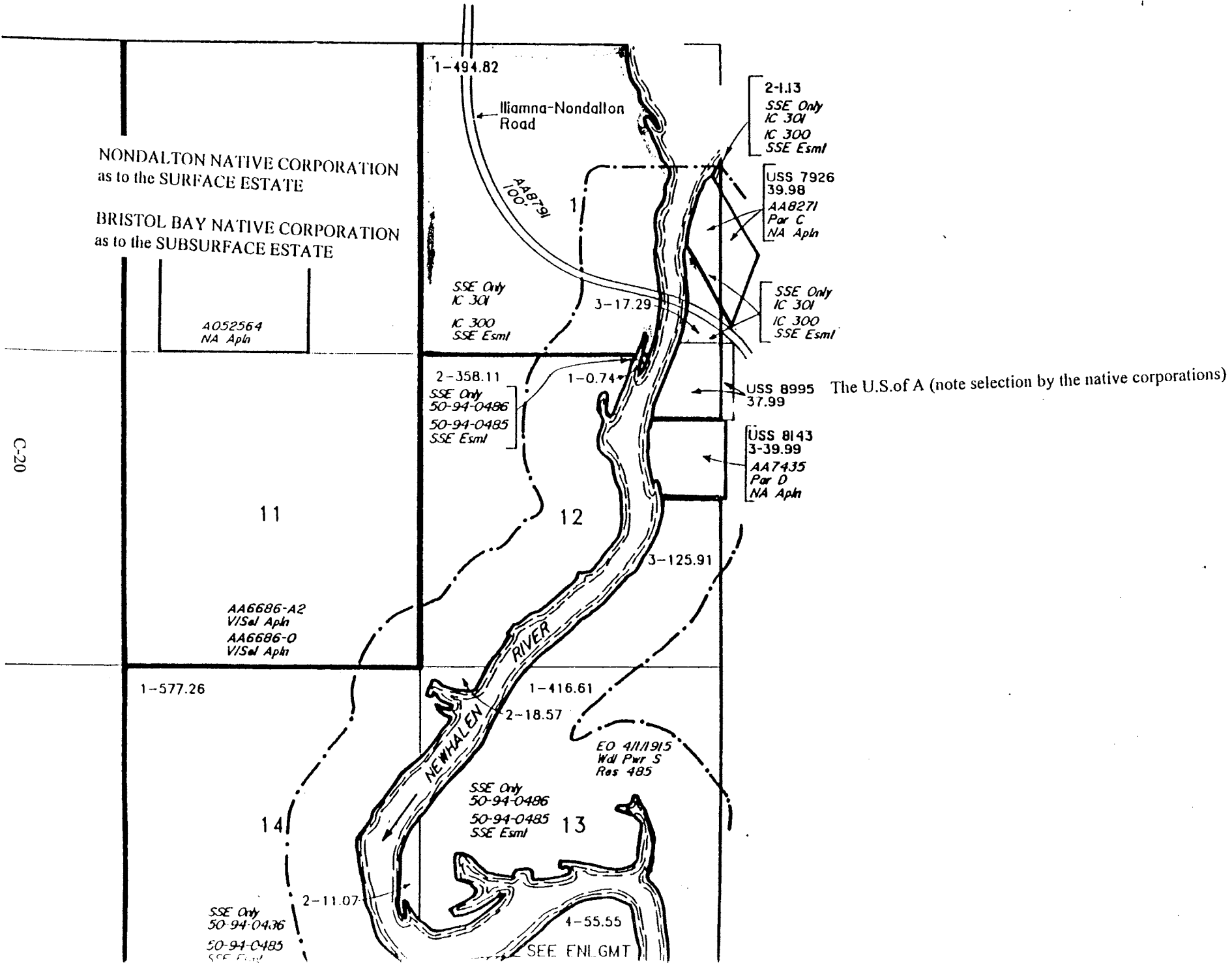
Amount N/A

When payable by grantee N/A

J. G. [unclear]

3-26-76

*ESB
3-17-76
ADP 2
2/16/76*



NONDALTON NATIVE CORPORATION
as to the SURFACE ESTATE

BRISTOL BAY NATIVE CORPORATION
as to the SUBSURFACE ESTATE

4052564
NA Apln

11

AA6686-A2
VISel Apln
AA6686-O
VISel Apln

1-577.26

14

SSE Only
50-94-0476
50-94-0485
SSE Esml

13

SEE ENLGMT

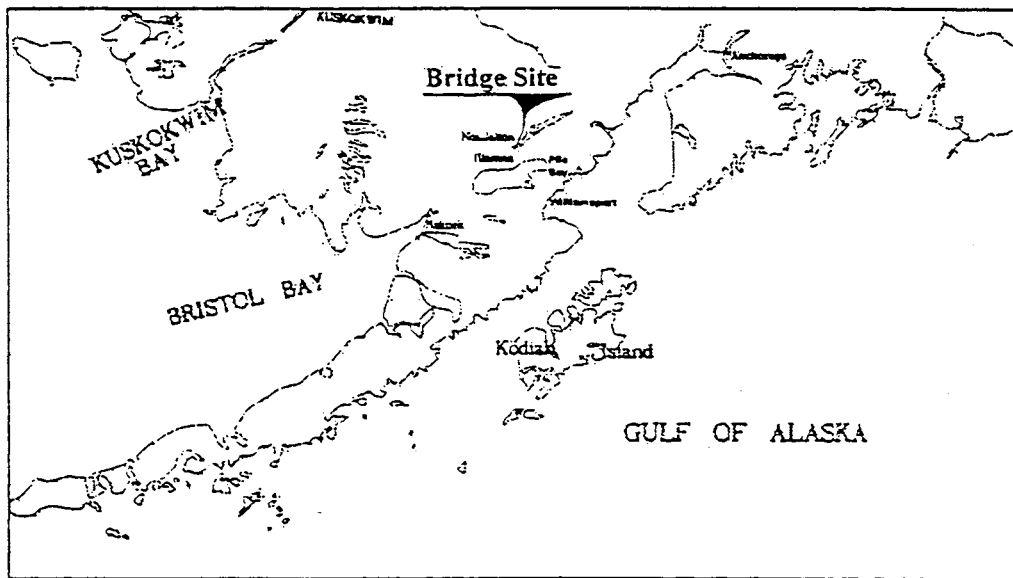
Hydraulic / Hydrology Report

Newhalen River Bridge No. 1286

Location and Project Description

The proposed project is located on the Newhalen River between Sixmile Lake and Lake Iliamna at approximately the SE1/4 of Section 1, T3S, R33W, Seward Meridian (USGS topographic map: Iliamna (D-5), Alaska. The site is approximately 3.5 kilometers (2.2 statute miles) downstream of Nondalton near the outlet of Sixmile Lake, and 11.9 river kilometers (7.4 statute river miles) upstream of the USGS Gage No. 153000000. The east (left) bank is approximately 18 meters (60 feet) higher than the floodplain riverbank on the west (right) side.

The proposed project consists of building a 199.1 meter (653.2 feet) six span bridge across the Newhalen River. The proposed bridge width is 5.69 meters (18'-8") with a 4.8 meter (15'-9") wide single lane roadway. The superstructure is proposed to be precast concrete deck panels on steel W-beams. The substructure units are three-pile bents consisting of precast pier caps on 0.76 meter (30 inch) diameter steel pipe piles, and spill through abutments.



Site Description and History

Tidal / non-tidal. The proposed bridge location is non-tidal.

Navigation. The Newhalen River is classified by the USCG as a navigable river. Historic use includes boat traffic by subsistence users and a small fuel barge

Confluence. The proposed location is immediately downstream of the outlet of Sixmile Lake, and approximately 5.0 river kilometers (3.1 river miles) upstream of a small unnamed lake. It is unknown if this small lake has any backwater effects on the proposed location, but seems unlikely.

Mining Activities. There are no known mining activities in the area that would have an effect on the channel morphology and bridge substructure.

Debris Problems. No direct information. Debris problems are believed to be minimal.

Icing Problems. No direct information. Ice is present during winter months of unknown thickness and unknown breakup characteristics. Ice thickness was assumed at 2 to 3 feet thick

Geomorphology. The reach of the Newhalen River between Nondalton and Iliamna is incised and slightly meandering. Stream gradients are steepest near its outlet to Lake Iliamna at about 0.5percent with

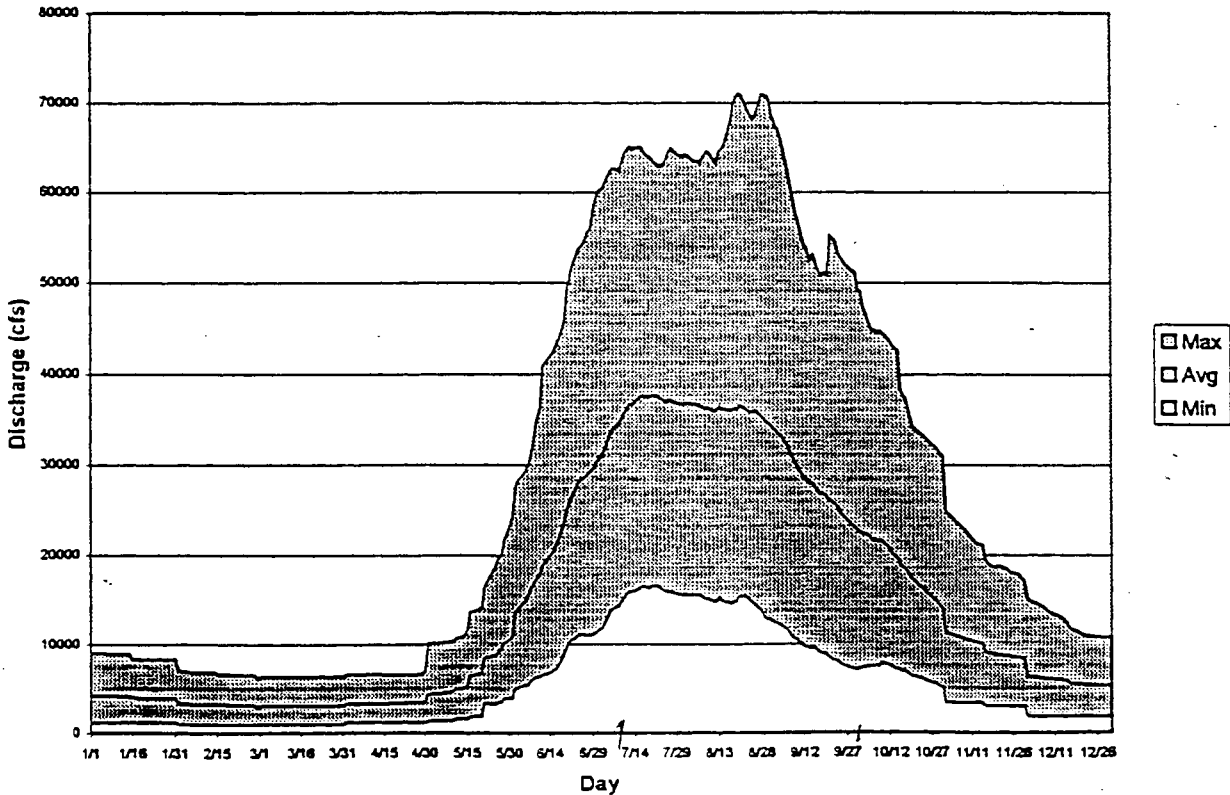
occasional rapids. The average stream gradient gradually decreases in an upstream direction becoming about 0.06 percent in the vicinity of the proposed bridge.

Fish Passage and Environmental Issues. The Newhalen River is identified as important for the spawning rearing or migration of anadromous fish pursuant to AS 16.05.870(a). Sockeye salmon use a portion of the waterway downstream of the bridge site for spawning.

Hydrology

The Newhalen River at the USGS gaging station 7.4 miles downstream of the proposed site has a drainage area of 3478 square miles. The proposed site has a drainage area of 3328 square miles or 96 percent, therefore flow characteristics will be similar for both sites. An examination of the flow record (1951-1967, 1982-1986) at the USGS gage shows that average daily flows range from 1000 cfs in the winter to 36,000 cfs in the summer. On average, discharge gradually decreases throughout the winter, becoming minimum during the month of April. This minimum ranges from 1200 to 2000 cfs. The maximum average daily discharge was 36,000 cfs, with an average maximum of 21,800 cfs. The lowest summertime maximum discharges were around 15,000 cfs. On average, peak flows can occur anytime between the beginning of July and the beginning of September. The maximum instantaneous peak flow for the period of record occurred in August of 1971 at 44,200 cfs.

Newhalen River Gage No. 15300000
Envelope Curves



Basin Characteristics. Basin characteristics for the proposed bridge site and for the USGS gage are given in the following table:

	Bridge 1286	USGS Gage No. 153000000
Drainage Area (sq. mi.)	3328	3478
Storage (percent lakes and ponds)	6	6
Average Elevation (feet)	2160	2160
Mean Annual Precipitation (in)	40	40
Mean minimum January Temp.(F)	8	8

Flood Frequency. Stream gaging records do not exist for the proposed bridge site, therefore the regression equations developed by the USGS (USGS WRI 93-4179) to estimate flood discharges for selected flood frequencies. However, since sufficient record exists at USGS Gage No. 153000000, Newhalen River, and the gage is in proximity to the site, the Log Pearson Type III frequency information can be used to calibrate the regression results for the ungaged site. The following table presents the calibration and the results:

Flood Frequency for Newhalen River Bridge No. 1286

Recurrence Interval	Exceedance Probability (percent)	Gage Wt'd Regression (cfs)	Gage Regression (cfs)	Calibration Coeff (rw)	Bridge Regression (cfs)	Calibrated Discharge (cfs)	Calibrated Discharge (cms)
2	50	254000	27000	0.946	25900	24500	693.8
5	20	30700	34600	0.897	33200	29800	843.8
10	10	34600	40300	0.871	38700	33700	954.3
25	4	39100	45700	0.868	43900	38100	1079
50	2	42300	49800	0.862	47900	41300	1169
100	1	45800	54000	0.861	51900	44700	1266
500	0.2	53500	63300	0.859	60900	52300	1481

Hydraulic Design.

Hydraulic summary. Based on a number of site surveys, hydraulic analyses were performed for the existing and proposed conditions at the site using the U.S. Army Corps of Engineers River Analysis System software HEC-RAS version 2.0. The modeling was limited by the lack of survey data to define the overbank floodplain along the left bank of the river. Contraction scour shown below was estimated upward from the calculated amount due to the uncertainties involved in computing the amount of overbank flow returning to the bridge along the embankment. Computed design highwater elevations are likely high, since the same lack of floodplain information results in a smaller hydraulic section than probably occurs. The results of the analyses are presented in the following table:

Flood Frequency (yr)	50	100	500
Exceedance Probability (%)	2	1	0.2
Design Discharge (cms)	1169	1266	1481
Design Highwater (m)	76.3	76.5	76.8
Anticipated Additional Backwater (m)	<0.1	<0.1	
Contraction Scour (m)		1.0	1.0
Abutment Scour (m)		na	na
Pier Scour (m)		1.2	1.3

Hydraulic Capacity: 2460 cms at Low Superstructure elevation of 78.31 m, which has an exceedance probability of equal to or less than 0.2 percent.

Riprap. Based on the maximum modeled impinging velocity of 3 mps at the bridge cross section, it is recommended that a 1 meter thick blanket of Class II riprap with a side slope of 1v:2h and a 1.5 m key below streambed be used at both abutments.

23 CFR (NFIP) and Flood Hazard area. The proposed project does not fall within a designated flood hazard area. That fact notwithstanding, the proposed bridge does not cause any measurable backwater.

Certification

The risks associated with the implementation of the proposed project are minimal.

The proposed work will not support any probable incompatible floodplain development.

The measures to minimize floodplain impacts, and to restore and preserve floodplain values, is to design and install an adequately sized structure that will limit the increase in backwater, and adequately pass the 50-year and 100-year floods without significant damage to the floodplain, bridge structure, or embankment.

There are no practical alternatives to the proposed encroachment that will serve to reduce the hydraulic impacts presented by the encroachment.



Mark Miles, P.E.
Hydraulic Engineer

NEWHALEN RIVER BRIDGE

TYPE SELECTION REPORT

**State of Alaska DOT & PF
Bridge Design Section
3132 Channel Drive
Juneau, AK 99801**

EXECUTIVE SUMMARY

Transportation between the villages of Iliamna and Nondalton is limited to water routes in the summer and ice routes in the winter. Both routes result in slow, dangerous travel. The villages require a year-round, all-weather transportation route for economic, safety, and social reasons.

In 1974, plans were prepared to connect the two villages by road thereby bridging the Newhalen River. The bridge plans for reconstructing two salvaged truss bridges over the river utilizing a large precast concrete pier near mid channel. One of the truss bridges was transported to the Anchorage International Airport and the other was taken directly to the Iliamna Airport to await assembly. For 25 years the salvaged bridges awaited to be reassembled.

In late 1995, the City of Iliamna requested ownership of the bridge truss stored at the Iliamna Airport for use in public works projects. Due to the large number of missing and damaged bridge components and the cost associated with replacing the members, the salvaged bridge was given to the City of Iliamna. Later that year, a park service organization requested and was granted ownership of the salvaged truss bridge stored at the Anchorage International Airport. Consequently the salvaged steel truss bridge option is no longer available for crossing the Newhalen River.

The shipment of large, heavy objects to the proposed bridge site is difficult and expensive. The Iliamna Airport is capable of accepting a large aircraft such as the Hercules and C-133. A combination land-sea route is also available. From Anchorage, bridge cargo would be placed on a barge and shipped to Williamsport then hauled over the Williamsport-Pile Bay road. A smaller barge will carry the materials to the village of Iliamna. From Iliamna, the cargo is carried on the Iliamna-Nondalton road to the proposed bridge site. This method of shipping imposes limits on the weights and sizes of the proposed bridge members.

Many different bridge types were examined for this crossing. A six span continuous steel girder bridge was found to be the best alternative. This structure type can be built from relatively short, light members whose size is established from the shipping restrictions. To further minimize shipping needs and in-water construction work, precast concrete deck panels and precast pier cap beams were specified. This allows for minimal cast-in-place concrete work and will significantly decrease the required construction time. The heaviest single member of the proposed bridge is limited to 174 kN such that aircraft transport is still a viable option.

Traffic projections indicated that a one-lane bridge with the ability to be widened at a future date would be the most economical. The estimated cost of the one lane, six span steel girder bridge is \$3,700,000.

After 25 years of waiting the residents of these small villages will be provided with a safe, all-weather transportation route.

TABLE OF CONTENTS

Executive Summary	1
Table of Contents	2
Introduction	3
Site Conditions	
Location and Transportation	4
Bridge and Roadway Alignment	5
Soil Condition	5
Seismic Vulnerability	5
Hydraulic Requirements	5
Description of Alternatives	
Salvaged Truss Bridge	6
New Two Span Truss Bridge	6
Two Span Steel Girder	6
Six Span Steel Girder	7
Six Span Timber Truss	7
Six Span Prestressed Concrete Girder	7
Clear Span Bridge Alternatives	8
Summary of Results	9
Appendix A – Proposed Construction Procedure	10

INTRODUCTION

The villages of Iliamna and Nondalton are located in southwest Alaska about 335 km southwest of Anchorage. Transportation between the two villages is limited to water routes in the summer and an ice route in the winter. Both routes provide for slow, dangerous travel. The villages require a year-round, all-weather land based transportation route for economic, safety, and social reasons.

In 1972, a road construction project was identified to upgrade a series of existing two-lane rural roads in the Iliamna and Newhalen areas and to construct a new road and bridge to connect the Iliamna Airport with the village of Nondalton. The purpose of the project was to replace existing substandard roads from Newhalen to Portage Landing via Iliamna Airport and to provide a bridge crossing over the Newhalen River. The project was to have provided the residents of all three communities with reliable, all-weather access. The most significant benefit would be the reduction of costs to passengers and carriers of freight and fuel oil between Iliamna and Nondalton.

The right-of-way was acquired by the Department of Transportation in 1974. In 1975, a series of public hearings was held in the Newhalen, Iliamna, and Nondalton seeking public opinion regarding the project. At the time, the residents of Nondalton expressed concern that their lifestyle would be affected and preferred that the road to Nondalton be removed from the project scope. As a result, in 1976, only the roads in the Iliamna and Newhalen area were upgraded. The Nondalton council president sent a letter to the department dated July 11, 1975 that presented the results of a house-to-house public opinion poll indicating that the residents were in favor of constructing the road (41 for, 25 against) but the decision to exclude Nondalton from the project had already been made.

During their 1981 session, the Alaska State Legislature appropriated \$150,000 in state general funds to the department to initiate work on a road project between Iliamna Airport and Nondalton. In 1986, an economic feasibility study was completed by the department. The benefits of the project included user cost savings, consumer goods savings, and local employment benefits.

In 1989, Senator Frank Zharoff wrote a letter on behalf of the City of Nondalton to the Governor requesting that the bridge be constructed as soon as possible. At that time, all necessary permits were current and salvaged truss bridge materials from the original 1974 plans were waiting to be reassembled. Funding was not obtained and the project was postponed.

The original bridge plan from 1974 was to reconstruct two salvaged truss bridges over the river employing a large precast concrete pier near mid channel. One of the truss bridges was transported to the Anchorage International Airport and the other was taken directly to the Iliamna Airport to await assembly. Every second year the truss bridge members were inventoried as part of the Department's biennial bridge inspection program. As the years passed, many of the bridge components became damaged, missing, or had become too corroded to reuse. By 1995, bridge inspectors noted that nearly half of all the truss members were unusable. The airport managers desired that the stockpiles be moved to allow for normal airport operations.

In late 1995, the City of Iliamna requested that the salvaged bridge truss stored at the Iliamna Airport be turned over to them for use in various projects such as building improvements and footbridge construction. Due to the large number of missing bridge components, the cost associated

with replacing the missing members, and the lack of funding for the project, the salvaged truss was given to the City of Iliamna.

Also in 1995, a park service organization requested and was granted ownership of the salvaged truss bridge stored at the Anchorage International Airport. The salvage material was used in the construction of a storage facility and footbridges in the Palmer area. Consequently, the salvaged steel truss bridge option is no longer available for crossing the Newhalen River.

In 1996 the project obtained funding. The bridge section again began planning for a bridge to cross the Newhalen River. After reviewing many bridge alternatives, a six span continuous steel girder bridge was selected as the preferred alternative.

SITE CONDITIONS

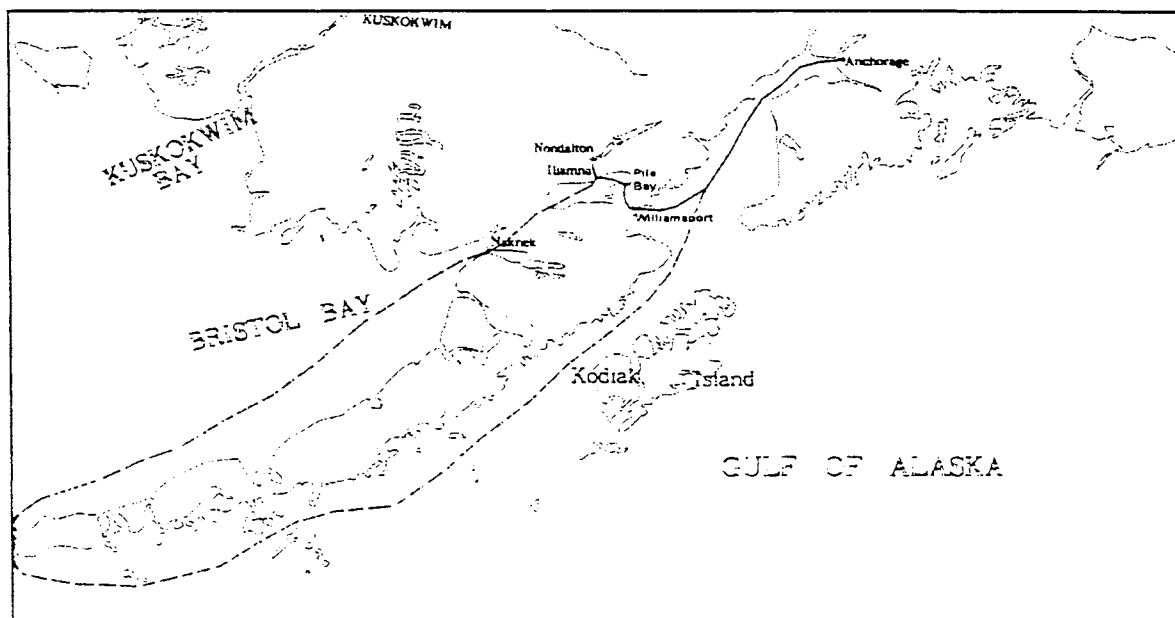
Location and Transportation

Sixmile Lake is located near the south end of Lake Clark and is located about 335 km southwest of Anchorage, Alaska. The proposed bridge location is several hundred meters downstream from the mouth of the Newhalen River formed by Sixmile Lake and is about 27 km north of Iliamna. The village of Iliamna is the largest community in the area and is the hub for regional activity. Iliamna has an airport and lake related barge facilities.

The shipment of large, heavy objects to Iliamna is difficult and expensive. The airport at Iliamna is capable of accepting a large aircraft such as the Hercules and C-133. These aircraft are limited both in size and weight of cargo. For example, the cargo hold of the Hercules aircraft is 2.5m X 2.5m X 13.7m and is limited to 191 kN and the C-133 aircraft has a cargo area which measures 3.5m X 3.5m X 27m is limited to 312 kN. Both aircraft are very expensive to charter and would require many flights to transport an entire bridge.

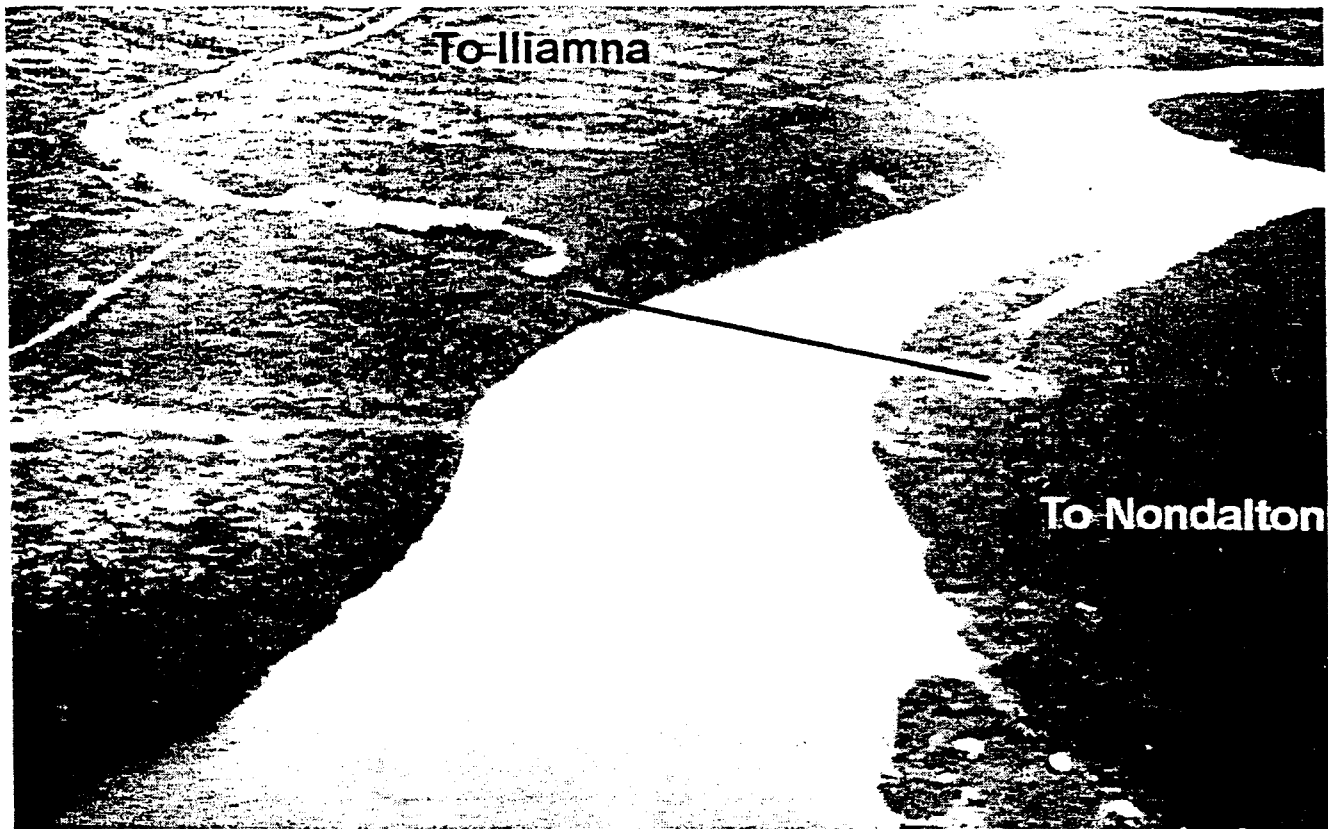
A combination land-sea route is available to the proposed bridge site. In this situation, the construction materials are shipped to Anchorage by the standard methods. It is then be placed on a barge and shipped to Williamsport where the cargo is off loaded during the high tide onto a tractor-trailer truck. The cargo is hauled over the Williamsport-Pile Bay road to Pile Bay where it is loaded onto a second, smaller barge. The barge carries the materials across Lake Iliamna to the village of Iliamna where it is again unloaded onto tractor-trailer trucks. From Iliamna, the cargo is carried on the Iliamna-Nondalton road to the proposed bridge site. Due to the limitation in the available barges, the maximum length of any single member is limited to 19 meters.

Finally, another land-sea route has been considered although it has not been used for several years. In this trip, the construction materials are shipped to Anchorage as before then loaded on a barge that will travel around the Alaska Peninsula to Naknek then up the Kvichak River to Lake Iliamna. The Kvichak River has not been used by barge for about five years due to low water levels making boating difficult and barging nearly impossible. Once in Iliamna, the cargo would be trucked to the proposed bridge site. The member size that can be shipped in this manner is limited to 27 meters.



Bridge and Roadway Alignment

The bridge is sloped on a one percent grade in accordance with the road plans. There is a high bank on the east side of the river where earthwork will be required to lower the roadway grade. There is no horizontal or vertical roadway curvature.



Soil Conditions

In 1975, a Foundation report was prepared. The glacial moraine soil is good for pile driving because no large rocks or boulders were encountered. No significant difficulties are anticipated in driving steel piles. Pipe piles were selected for this site due to the anticipated ice loads acting on the piers.

Seismic Acceleration

The seismic acceleration at this site is 0.15g as established by the AASHTO Standard Specifications for Highway Bridges. No soil liquefaction is expected during a seismic event. Although the seismic loading at this site is low by Alaskan standards, it is still a major design issue.

Hydrologic Requirements

The preliminary hydraulic study indicates that a 160m channel width is required at this location. Due to the close proximity to the lake, the water levels do not vary significantly under flood conditions. Also due to the close proximity of the lake, thick river ice does not usually form at this location. However ice loads produce the maximum lateral forces experienced by the piers.

DESCRIPTION OF ALTERNATIVES

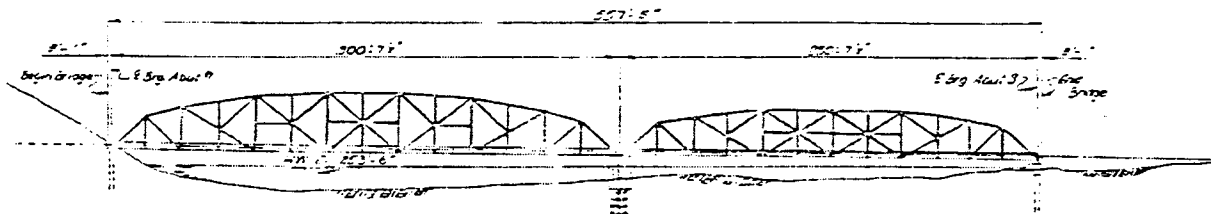
Many different bridge types were examined for this site. Of those selected, seven were considered for further discussion but are not necessarily viable alternatives.

Salvaged Truss Bridge

Two salvaged truss bridges were originally proposed for this site in 1972. Together with a concrete pier, these two bridges were to span the river in 170m total bridge length. After 25 years of storage, the truss members were damaged, corroded and missing. In 1995, the remaining bridge components were donated to other organizations that used the steel members for various public projects. This option is no longer available.

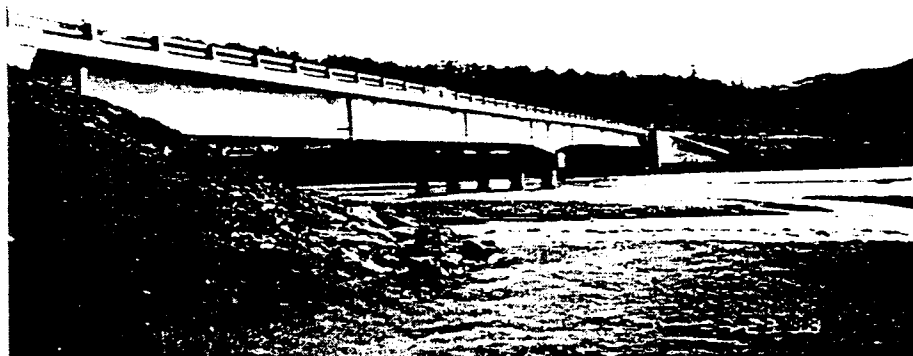
New Two Span Truss Bridge

A replacement structure similar to the original 1972 plan was examined. This structure is composed of two steel truss spans, one span length of 75m and the other of 95m. The original precast concrete pier was reconsidered. The advantage of the steel truss bridge is that the pieces are small and easily transported. The disadvantage of the truss is that it cannot be widened in the future and is labor intensive (expensive) to construct. Also, a temporary bridge would be required during the construction of the bridge. Temporary piles would be driven at each of the truss panel points then removed after the truss spans are fully assembled. This process would take an estimated six months not including the construction of the precast pier. The total area of the precast pier is about 19 square meters. The estimated cost of this option is \$6,500,000.



Two Span Steel Girder

A two span steel girder bridge similar in span proportion to the truss bridge was considered. The same precast concrete pier as proposed for the truss bridge was also considered for this option. A single lane and double lane bridge were investigated. The cheaper one-lane bridge was estimated to cost \$8,000,000. As previously discussed, mobilization and transport to this location is very difficult and expensive. The large girder segments required for this bridge were too large to be shipped to the site by either barge or aircraft. This option was deemed impractical.

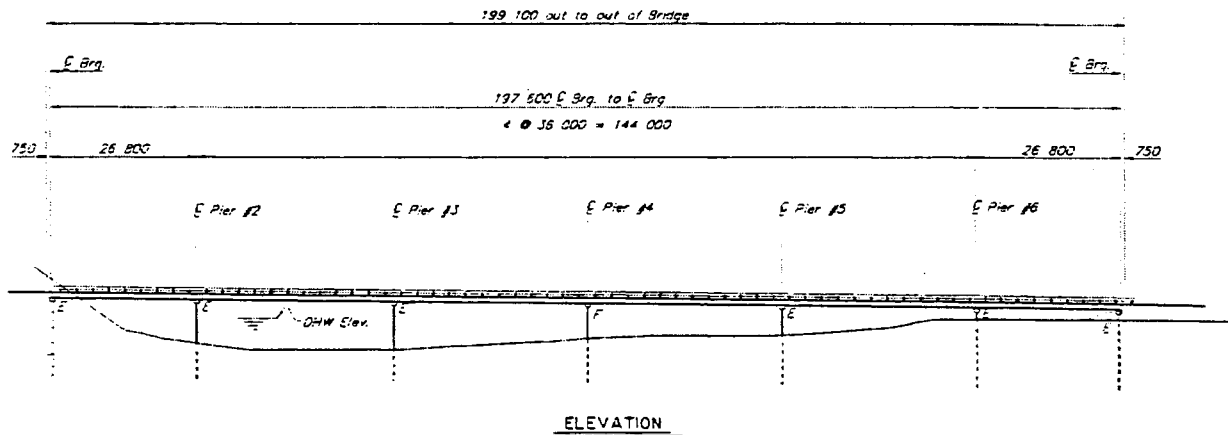


Six Span Steel Girder

A multiple span steel girder bridge was evaluated. Under the most likely shipping route (Williamsport-Pile Bay) the maximum member size is about 19m. Since only two splices per span are practical, the maximum clear span that could be built is 38m. With this in mind, a six-span steel girder bridge is required. This structure type can be built from relatively short, light members. Steel pipe piles are used for the pier columns. The total displaced river area of the piers is less than 6 square meters.

To further minimize shipping needs, precast concrete deck panels and precast pier cap beams were specified. This will allow for minimal cast-in-place concrete work and will significantly decrease the required construction time. A 140 ton crane is capable of loading and unloading the barges as well as driving the steel piling. The crane is capable of lifting all girder segments, deck panels, and pier cap beams into place during construction. The heaviest member of the proposed bridge is limited to 174 kN such that aircraft transport is still a viable option.

A two-lane and a one-lane version of the proposed bridge were considered. Traffic projections indicated that a one-lane bridge with the ability to be widened at a future date would be the most economical. The estimated cost of the one lane, six span steel girder bridge is \$3,700,000.



Six Span Timber Truss

Using the same geometry as the six span steel girder bridge, a multiple span timber truss bridge was proposed. The truss segments could be assembled at the site and positioned without the need for temporary in-water falsework. The piers would be identical to those proposed for the six span steel girder bridge.

As with the six span steel girder bridge, a 140 Ton crane would be capable of lifting all bridge components into place. All the bridge members are light enough that they could be shipped to the site by air if necessary. The estimated cost of this option was estimated to be \$4,200,000.

Six Span Prestressed Concrete Girder

A precast, prestressed concrete girder multiple span bridge was briefly considered but due to the great weight of the members (and associated shipping and handling problems) this structure type was not considered feasible.

Consideration was also given to casting the concrete girders near the bridge site. This method would require that a mobile concrete batch plant be shipped to the site. Although the second barge transportation option (up the Kvichak River) could ship such a plant, due to the recent low water levels, this option may not be practical. The estimated cost to construct this bridge is \$4,600,000.

Clear Span Bridge Alternatives

A single span alternative was desired. Due to the large amount of concrete needed for the anchorage blocks for the cable-supported structures, this alternative was not considered feasible.

A single span, tied steel arch bridge was examined. Because an arch bridge is not easily widened, only a two-lane bridge was considered. Extensive in-water work would be required to place the arch segments and would require in-water falsework similar to the two span truss bridge alternative. A large crane(s) would be required to drive the piles for the larger abutments required for this large bridge.

The estimated cost of this bridge type is \$8,000,000.



SUMMARY OF RESULTS

STRUCTURE TYPE	ESTIMATED COST	ADVANTAGES	DISADVANTAGES
Salvaged Truss Bridge	Not Applicable		<ul style="list-style-type: none"> •No longer own the salvaged truss components.
New Two Span Truss Bridge	\$6,500,000	<ul style="list-style-type: none"> •Only one pier is required. •Light members are easily transported. 	<ul style="list-style-type: none"> •Pier displaces 19 square meters. •Temporary in-water falsework required. •Expensive to build.
Two Span Steel Girder	\$8,000,000	<ul style="list-style-type: none"> • Only one pier is required. 	<ul style="list-style-type: none"> •Pier displaces 19 square meters. •Temporary in-water falsework may be required. •Expensive to build. •May not be able to transport heavy, long girder segments.
Six Span Steel Girder	\$3,700,000	<ul style="list-style-type: none"> •Lightweight girder segments, deck panels and pile segments are easy to ship and assemble. •No temporary in-water falsework required. •Least expensive option. •Can build one-lane bridge now and widen later. 	<ul style="list-style-type: none"> •Five piers are required, four in waterway. •Piers displace 6 square meters (total).
Six Span Timber Truss	\$4,200,000	<ul style="list-style-type: none"> •Lightweight timber trusses and pile segments are easy to ship. •No temporary in-water falsework required. 	<ul style="list-style-type: none"> •Five piers are required, four in the waterway. •Timber requires chemical treatment that may not be allowed at this site. •Piers displace 6 square meters.
Six Span Prestressed Concrete Girder	\$4,600,000	<ul style="list-style-type: none"> •Minimal future maintenance cost. •No temporary in-water falsework required. 	<ul style="list-style-type: none"> •Five piers are required, four in the waterway. •Materials are very heavy and difficult to place. •Must transport concrete batch plant to site (cost not included). •Piers displace 6 square meters.
Clear Span Bridge Alternatives – Tied Arch Bridge	\$8,000,000 (minimum)	<ul style="list-style-type: none"> •Minimal long term impact on river. 	<ul style="list-style-type: none"> •Heavy pieces are difficult to ship and assembly. •Requires large crane(s) to assemble bridge. •Extensive temporary in-water falsework required during construction. •Difficult to maintain boat traffic during construction. •Allows for no roadway grade, thus more excavation on Iliamna bank. •Most expensive option.

Appendix A Proposed Construction Procedure

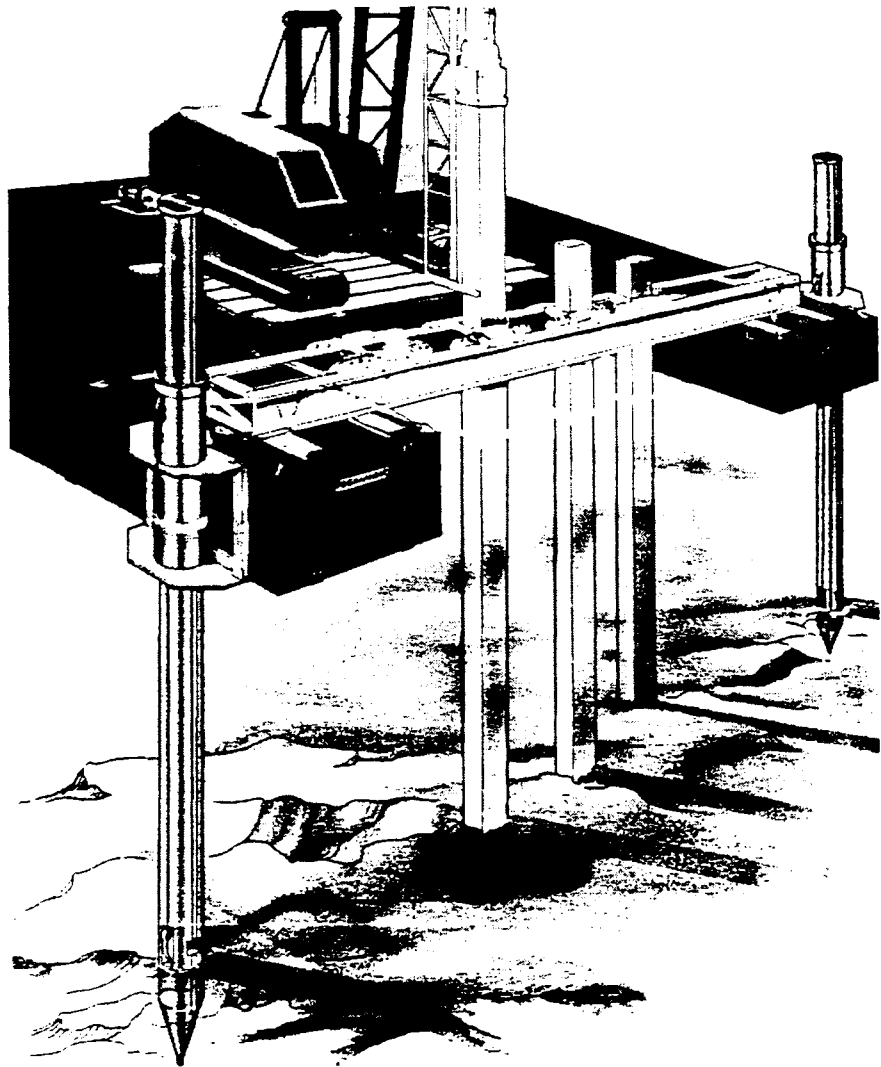
Step 1 Mobilization

Order materials and transport to the bridge site. A (presume 140 Ton) crane or small front end loader will likely accompany the construction materials during transport to load and unload the barges.

See Location and Transportation section for more information on shipping the bridge components.

Step 2 Drive Pipe Piles

Drive pipe pile for piers from small barge or floating work platform. Three 30" diameter pipe piles are required at each support driven with the crane using a D32 hammer (minimum). Dewater and excavate top 3 meters of soil from within the pile. Collect all evacuated materials for disposal away from the river.



Step 3 Assemble Substructure

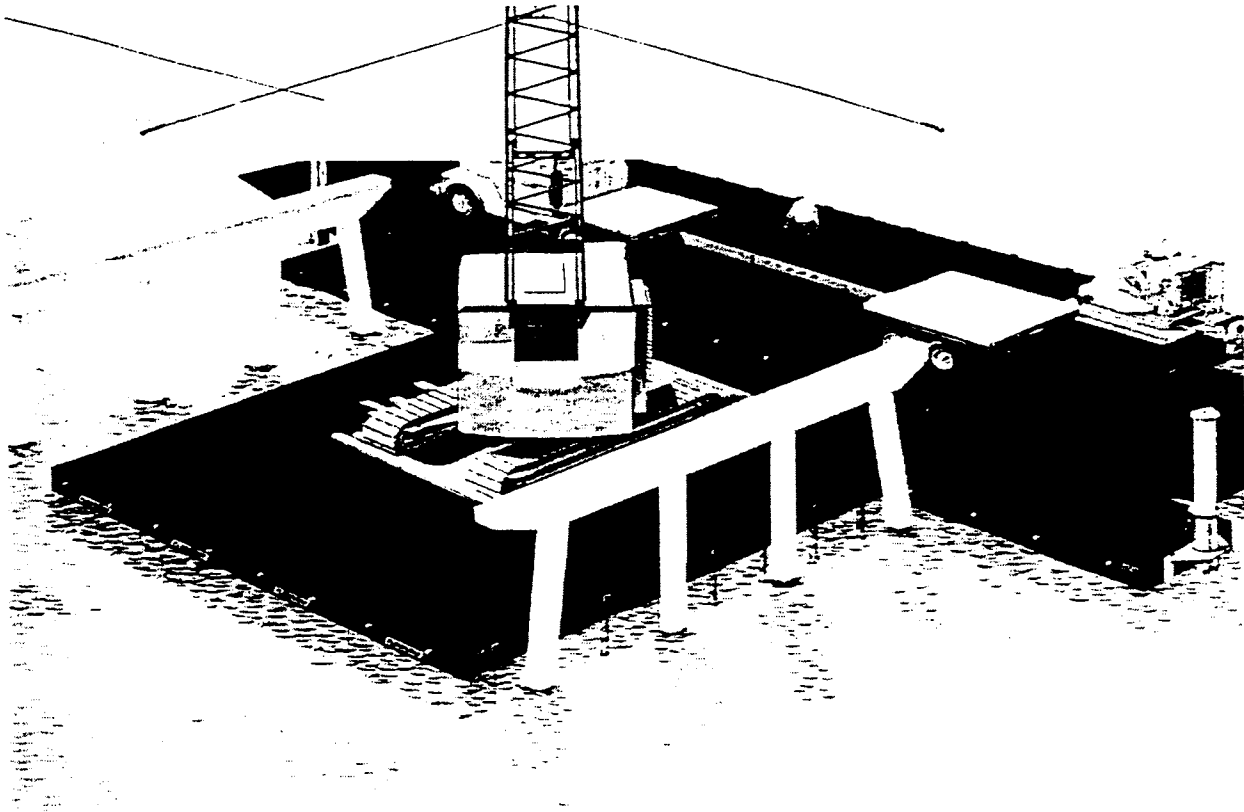
Place reinforcing steel in top of pipe pile. Install steel pile collar and set precast pier caps on each pier to elevation shown on the plans. Fill pipe pile and void in precast cap beam with concrete.

Place reinforcing steel for backwall and wingwalls. After the reinforcing steel is in place, install the forms and place concrete. The method of construction will

dictate the point in time when the backwalls must be placed. That is, the backwalls will need to be constructed prior to placing the deck panels if a front end loader is used but can be placed after the deck panels are positioned if a crane working from the water is used.

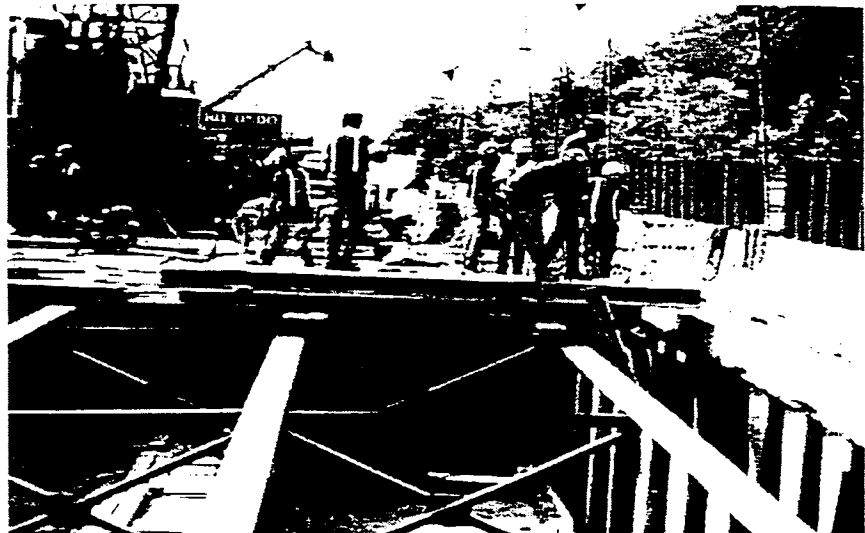
Step 3 Assemble Superstructure

Lift steel girder segments into position using the crane and bolt together field splices. Install cross bracing members to provide stability.



Step 4 Place Deck Panels

Adhere polyethylene backer rod material to the edges of the top flanges for the entire length of the bridge. Place precast deck panels on bridge using either the crane working from a barge or using a small front end loader working from the bridge. After placing and leveling all deck panels, grout blockouts, shear keys and haunch areas with an epoxy polymer concrete.



Step 5 Install Bridge Railing

Form up rail curb and place concrete. Install metal bridge rail.

Step 6 Demobilization

Remove all construction equipment from bridge site.

ADGC Final Consistency Determination

STATE OF ALASKA

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

TONY KNOWLES, GOVERNOR

Dan Golden
Dept of Transportation & Public Facilities
P. O. Box 196900
Anchorage, AK 99519

SOUTHCENTRAL REGIONAL OFFICE
550 W. 7TH AVENUE, SUITE 1660
ANCHORAGE, ALASKA 99501
PH: (907) 269-7470/FAX: (907) 269-3981

CENTRAL OFFICE
P.O. BOX 110030
JUNEAU, ALASKA 99811-0030
PH: (907) 465-3562/FAX: (907) 465-3075

PIPELINE COORDINATOR'S OFFICE
411 WEST 4TH AVENUE, SUITE 2C
ANCHORAGE, ALASKA 99501
PH: (907) 271-4317/FAX: (907) 272-3829

February 23, 2001

Ms. Carol Sanner
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, Alaska 99519-6900

Dear Ms. Sanner:

SUBJECT: NEWHALEN RIVER 4
STATE ID NO. AK 0002-12AA
FINAL CONSISTENCY DETERMINATION

The Division of Governmental Coordination (DGC) is coordinating the State's review of the Alaska Department of Transportation and Public Facilities (DOT/PF) proposed project for consistency with the Alaska Coastal Management Program (ACMP) and has developed this final consistency determination based on reviewers' comments.

Scope of Project Reviewed

The project subject to this consistency review is the improvement of overland access between Iliamna/Newhalen and Nondalton in T 2S, 3S, 4S and 5S, R 32W and 33W, Section (crosses 13 sections), Seward Meridian. The project would rehabilitate the existing 14.4 miles of the existing roadway from Iliamna to the Newhalen River; construct a 653 ft. six-span bridge across the Newhalen River, and improve an existing 1.7 mile roadway/trail from the bridge to connect to the existing improved road to the City of Nondalton.

In response to modifications that the State required in its letter of September 14, 2000 for your project to be consistent with the ACMP, you provided more refined plans and specifications to the Alaska Department of Fish and Game (DFG). DFG has revised its position based on the following refinements to your project:

The existing road upgrade work between Iliamna and Alexcy Creek is to include resurfacing, restoring and rehabilitating the roadway. Drainage problems including embankment erosion at low spots around culverts and at soft spots would be corrected. As needed, existing culverts would be repaired or replaced. The road embankments at the Bear Creek, Lovers Creek, South Fork Alexcy Creek and Alexcy Creek crossings will be stabilized using tiers of gabions to create inlet and outlet headwalls. At Bear Creek (station

772 6101
519 21

Pr. Design & Environmental Section	APPY	ACTION
PD&E Engr.		
Project Mgr.	JD	1/11
Env. Coord.	JA	1/11
Env. Team Leader	JA	1/11
Staff	Don	1/11
Council		1/11
Hydrologist		
Project File		2
Central File		

number 38+877) a pair of baffles will be installed in the existing culvert and an outlet apron of class II riprap extending 30 feet downstream of the outlet will be installed in the streambed. At Lovers Creek (station number 39+765) eight baffles will be installed in the existing culvert and an outlet apron of class II riprap extending 20 feet downstream of the outlet will be installed in the streambed. At the South Fork Alexcy Creek (station number 44+669), creating a series of step pools, using rock weirs, downstream of the culvert outlet would repair the outlet of the perched culvert. Conceptual plans for the step pools are included in the review materials; however, final design has not been completed. Eight baffles will also be placed inside the existing South Fork Alexcy Creek culvert.

Between Alexcy Creek and the materials site south of Nondalton, road improvements are to include reconstruction or installation of the roadway base and road surfacing, as well as installation, extension or replacement of culverts at several stream crossings. Culverted crossings of fish bearing waters are identified at project stations 55+700 (formerly 55+720), 56+100 (formerly 56+113), 56+560 (formerly 56+709), 56+700 (formerly 56+780). Between Nondalton and the materials site south of the village, the existing road would be resurfaced and rehabilitated with two culverts to be replaced, one at station 57+358 (formerly 57+360) and the other at 57+517 (formerly 57+518).

At station 55+700 a 5-foot diameter, 83-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 9 feet upstream of the inlet and a class II riprap apron will be installed in the streambed for a distance of 15 feet downstream of the outlet. Baffles will be placed in the barrel of the culvert. At station 56+100 a 4-foot diameter, 83-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 9 feet upstream of the inlet and a class II riprap apron will be installed in the streambed for a distance of 12 feet downstream of the outlet. Baffles will be placed in the barrel of the culvert. At station 56+560 a 5-foot diameter, 54-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 5 feet upstream of the inlet and a class III riprap apron will be installed in the streambed for a distance of 15 feet downstream of the outlet. Baffles will not be placed in the barrel of this culvert. At station 56+700 a 5-foot diameter, 61-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 9 feet upstream of the inlet and a class III riprap apron will be installed in the streambed for a distance of 15 feet downstream of the outlet. Baffles will be placed in the barrel of the culvert. At station 57+358 an 8-foot diameter, 125-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 10 feet upstream of the inlet and a class II riprap apron will be installed in the streambed for a distance of 24 feet downstream of the outlet. Baffles will be placed in the barrel of the culvert. At station

57+517 a 4-foot diameter, 146-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 9 feet upstream of the inlet and a class II riprap apron will be installed in the streambed for a distance of 12 feet downstream of the outlet. Baffles will be placed in the barrel of the culvert. All of the culvert inlet and outlet riprap aprons will be underlain with geotextile fabric and will be installed to thicknesses of at least 15.5 inches for class I riprap, 31 inches for class II riprap, and 46.5 inches for class III riprap. At each of these culvert inlets, riprap will also be placed on the road embankment from 4.5 to 5 feet above the culvert invert or to 11 inches above the top of the adjacent streambank, whichever is less. On the outlet of the culverts, riprap will also be placed on the road embankment from 3 to 4 feet above the culvert invert or to 11 inches above the top of the adjacent streambank, whichever is less. At all but one of these culverts, baffles are proposed inside the culvert to accommodate fish passage. The baffle design, however has not yet been developed.

The Newhalen River Bridge superstructure would consist of four steel stringers supporting precast concrete deck panels. Five piers spaced about 118 feet apart would support the steel girders. Each pier consists of three 30-inch diameter steel pipe piles. Four of the piers would be located below the ordinary high water level of the river. Due to elevation differences between the east and west banks of the river, about 33 feet of the east bank would be excavated to lower the east end of the bridge thereby reducing the slope of the bridge's running surface. The bridge will slope at about 2.3 percent to the west. Plans included for review show that a 40-inch thick blanket of riprap would be placed below the ordinary high water level of the Newhalen River under the east end of the bridge. The estimated 136 cubic yards of riprap would be installed beneath the existing streambank and riverbed surface profiles so that the top of the riprap will not protrude above streambank or streambed contours.

The project includes a boat launch at the west side of the bridge. The preferred location for the boat launch is in the City of Nondalton. DFG has agreed to partner with the city to construct a boat launch on Sixmile Lake as a point of access to the river and Lake Clark, which is upstream from Sixmile Lake. However, the city has not yet signed the agreement. DOT/PF and Alaska Department of Fish and Game (DFG) recognize that the public will access the river at the bridge both to fish and to launch boats if no nearby alternative is available. To ensure the river bank is not damaged, DOT/PF has retained the boat launch within the project description as a backup measure in the event the City of Nondalton does not provide an alternative site for the boat launch.

The launch would consist of a ramp of concrete planks that would be approximately 13 feet x 39 feet; a gravel launch access road that would be approximately 13 feet x 164 feet; and a gravel parking lot that would be approximately 65 feet x 118 feet.

If a boat launch is developed in the City of Nondalton, DOT/PF will construct only a controlled vehicle parking area and an access trail. The purpose of the access trail is to ensure that foot traffic that DOT/PF and DFG believe, based that experience, will likely access the river from the bridge site does not trample the vegetation causing soil erosion and the subsequent loss of water quality.

This proposed consistency determination applies to the following federal and State authorizations per 6 AAC 50:

U.S. Army Corps of Engineers
Section 404 and 10 Permit No. 2-830477

Alaska Department of Environmental Conservation (DEC)
Certificate of Reasonable Assurance (401)

Alaska Department of Fish and Game (DFG)
Fish Habitat Permit

Alaska Department of Natural Resources (DNR)
Right-of-Way No. ADL 227751

U.S. Coast Guard
Bridge authorization

No State or federal agency may issue an authorization before DGC issues a final consistency determination. But, a consistency determination does not obligate any agency to issue authorization under its own statutory authorities, nor does it supersede its statutory obligations. Authorities outside the ACMP may result in additional permit/lease conditions not contained in the consistency determination. Most State agencies should issue permits within five days after DGC issues a final consistency determination. However, State law does not require DNR to issue authorizations involving disposal of State interest within five days, so it may take considerably longer for you to receive such permits. You may not use any State land without DNR authorization.

Project Evaluation

6 AAC 80 Standards:

6 AAC 80.040. Coastal Development: In approving new development in coastal areas, districts and state agencies are required to give in the following order, priority to (1) water dependent

uses; (2) water-related uses, (3) uses and activities which are neither water-dependent nor water-related for which there is no feasible and prudent inland alternative to meet the public need for the use or activity. The proposed road includes a bridge across the Newhalen River. In order to provide year-round ground transportation between Iliamna and Nondalton, such a river crossing is unavoidable. At no other location is the road adjacent to the river. The road fills a public need. DOT/PF determined and the residents have testified that the road will provide the community with health, safety, and economic benefits. The proposed road and bridge meet the standards that there is no feasible and prudent alternative to crossing the river to meet the public need for the road between Iliamna and Nondalton; the project is consistent with the statewide standard for coastal development.

The boat launch is water dependent and would be consistent with this statewide standard in either location.

6 AAC 80.050. Geophysical Hazards: Not applicable.

6 AAC 80.060. Recreation: The statewide standard encourages districts and state agencies to give high priority to maintaining and, where appropriate, increasing public access to coastal water. The primary purpose of the road is to provide transportation for residents between Nondalton and Iliamna. At the same time, however, the road facilitates visitor access to the city of Nondalton and the Newhalen River -- a prime recreational area. Construction of either boat launch (the preferred site within the city limits or the site adjacent to the bridge) will facilitate public access onto the Newhalen River. If the boat launch is constructed in the city of Nondalton, DOT/PF will provide a parking area and access trail to accommodate the inevitable use of the cleared area adjacent to the bridge by recreationalists who wish to access the river.

In addition to the access provided by the project, Stipulation 22 prohibits restricting the ability of all persons to use or access State land or public water. The project provides an opportunity for recreational access to the river and is consistent with this policy.

6 AAC 80.070. Energy Facilities: Not applicable.

6 AAC 80.080. Transportation and Utilities.

Policy (a) requires that transportation and utility routes and facilities in the coastal area be sited, designed, and constructed to be compatible with district programs. The district has found the route consistent with its policies. The district finding is supported in the analysis of the district policies, especially Lake and Peninsula Borough (L&PB) policies E-1, E-2 and E-4 that are evaluated in the following section of this consistency determination.

Policy (b) requires that transportation and utility routes and facilities be sited inland from beaches and shorelines unless the route or facility is water-dependent or no feasible and prudent

inland alternative exists to meet the public need for the route or facility. As noted in the assessment of 6 AAC 80.040, the selected route follows existing roads between Iliamna and the Newhalen River and a roadway/trail between the Newhalen River and Nondalton and is the reasonable and feasible alternative. There is no alternative that does not cross the river. The selected route is the least damaging alternative; the project is consistent with the statewide standard for transportation and utilities.

6 AAC 80.090. Fish and Seafood Processing. Not applicable.

6 AAC 80.100. Timber Harvest and Processing. Not applicable.

6 AAC 80.110. Mining and Mineral Processing. Not applicable.

6 AAC 80.120. Subsistence. The subsistence policy requires that districts and state agencies recognize and assure opportunities for subsistence use of coastal areas and resources. Districts also may designate subsistence zones in those areas where the coastal plan identified subsistence as the dominant use of coastal resources. In designated subsistence zones, subsistence uses and activities have priority over all non-subsistence uses and activities. The project is not within a designated subsistence zone.

Several subsistence users have stated that a boat launch located at the bridge site will have a negative impact on those who have fish camps in the vicinity. Their concern is that those using the boat launch may trespass and damage nearby fish camps, leave trash, act inappropriately around bears that frequent the area, and diminish the privacy of those who use the fish camps. The potential for this negative impact is acknowledged. Including the boat launch at the bridge as part of the project is consistent only with that location as a backup measure to the preferred site for a boat launch on Sixmile Lake. If the boat launch is constructed at the bridge site, the area will include appropriate signage to address residents' expressed concerns concerning (1) trespass onto adjacent properties and (2) proper disposal of trash. As modified in the project description, the proposed project is consistent with the statewide standard for subsistence.

6 AAC 80.130. Habitats.

The project includes uplands, wetlands, and riverbanks and, therefore, must be conducted in conformance with 6 AAC 80.130(c)(3) and (7). The standards require that wetlands be managed:

1. to assure adequate water flow, nutrients, and oxygen levels and
2. to avoid adverse effects on natural drainage patterns, the destruction of important habitat, and the discharge of toxic substances.

Riverine habitat must be managed to protect natural vegetation, water quality, important fish or wildlife habitat, and natural water flow.

The project also must be conducted in conformance with 6 AAC 80.130(b) and be "managed so

as to maintain or enhance the biological, physical, and chemical characteristics of the habitat which contribute to its capacity to support living resources.”

Diminution of a habitat's capacity to support living resources can be allowed if a project meets the three conditions found at 6 AAC 80.130(d). The first condition -- public need -- was established in the analysis of the Development standard (6 AAC 80.040). The second condition - - that there is no feasible and prudent alternative to meet the public need that would conform to the Habitats standard -- was addressed in the analysis of the Transportation and Utilities standard (8 AAC 80.080). The final condition requires all feasible and prudent steps be taken to maximize conformance with the relevant elements of the Habitats standards. In addition to the best-management practices DOT/PF incorporated to minimize habitat impacts, the DOT/PF modified the project description related to the boat launch facility. A boat launch adjacent to the bridge is now included only as a backup measure to the preferred site within the City of Nondalton. This change balances resident's concerns that a boat launch adjacent to the bridge will affect nearby subsistence camps and DFG's concerns that without a nearby boat launch alternative, the public will access the river next to the bridge anyway and damage the river banks. If the boat launch is constructed in Nondalton, DOT/PF will construct only a parking area and footpath to ensure foot traffic to the river does not break down the river bank and lead to soil erosion and the subsequent loss of water quality. The State also has stipulated 21 additional requirements in its consistency determination to ensure this statewide standard is met (Stipulations 1 through 21). As modified in the project description and by the stipulations, the project is consistent with the statewide standard for habitats.

6 AAC 80.140. Air, Land and Water Quality

The ACMP requires an evaluation of the project against the standards found at 6 AAC 80. The ACMP standard for air, land and water quality is the statutes, regulations and procedures of the Alaska Department of Environmental Conservation as administered by that agency. DEC conducted its review of the proposed project pursuant to DEC statutes, regulations, and procedures. Stipulations 19 and 20 were developed specifically to meet DEC's mandate regarding its 401 certification of the COE 404 permit. The 401 certification will be issued with these necessary modifications. Therefore, the project is consistent with the Air, Land and Water Quality standard.

6 AAC 80.150. Historic, Prehistoric, and Archaeological Resources: DOT/PF contacted the State Historic Preservation Officer (SHPO) who determined no survey was necessary for the portion of the project between Iliamna and the Newhalen River. SHPO required a survey for the portion between the Newhalen River and Nondalton. A survey was conducted on September 10 and 11, 1996; the survey found no sites eligible for the National Register of Historic Places. Based on the results of the survey, the SHPO concluded the responsibilities of DOT/PF and the Federal Highway Administration under section 106 of the Historic Preservation Act. The project

is consistent with the statewide standard for historic, prehistoric, and archaeological resources.

Coastal Resource District Enforceable Policies

A-1. Water-Dependent and Water-Related Activities: See 6 AAC 80.040.

A-2. Mitigation: The L&PB CMP mitigation policy requires that all land and water use activities be conducted with a level of planning, implementation, and monitoring/enforcement which is appropriate to mitigate potentially adverse effects and/or cumulative impacts on the following resources of local, state, or national importance:

- a) fish and wildlife populations and their habitats;
- b) commercial fishing uses and activities;
- c) subsistence and personal use resources and activities;
- d) air and water quality;
- e) cultural resources; and
- f) recreational resources.

Under the L&PB policy, mitigation shall include and be considered in the following order of preference:

- a) avoid the loss altogether by not taking a certain action or parts of an action;
- b) when the loss cannot be avoided, minimize the loss by limiting the degree or magnitude of the action and its implementation;
- c) when the loss of resources and/or associated activities of local, state, or national concern cannot be minimized, restore or rehabilitate the resource to its pre-disturbance condition, to the extent feasible and prudent; and
- d) where the loss of important habitat or activities of local, state, or national concern is substantial and irreversible and cannot be avoided, minimized or rectified, compensate for the loss by replacing, enhancing, or providing substitute resources or environments. Compensation may be in-kind or out-of-kind, and off-site or on-site. The preferred option is in-kind and on-site, to the extent feasible and prudent.

As noted in the assessment of the statewide standards for Subsistence; Recreation; Habitats; And Air, Land, And Water Quality, the State has developed stipulations to minimize impacts of this project. No loss requiring compensation (per order of preference [d]) was identified. As modified by the project description and the 22 ACMP stipulations, the project is consistent with this district policy.

A-5. Dredge and Fill Requirements: This project involves working in the Newhalen River and filling wetlands. To be consistent with this policy, DOT/PF needs to:

- a) avoid significant adverse impacts to important fish and wildlife habitats;
- b) avoid significant interference with fish migration, spawning, and rearing as well

- as critical life history stages of wildlife;
- c) limit the extent of direct disturbance to the minimum area necessary to accommodate the proposed purpose or use;
- d) minimize erosion and the potential for turbid waters and waterborne sediment to be transported away from the dredge or fill site; and
- e) provide for circulation and drainage patterns adequate to maintain habitat productivity and water quality.

In addition to the design provisions of the project, the ACMP review has stipulated 21 modifications that will appear as stipulations on State permits that will be issued for the project. Stipulations specify design features for culverts and the rock weirs (numbers 1 through 13) to avoid significant impacts to fish habitat. Stipulations 14 through 21 address timing restrictions for bridge work, limitations for riprap installation, restrictions on equipment fueling and servicing, maintaining oil-spill cleanup materials on site, limiting discharges, and implementing erosion control measures. With the appropriate stipulations, the project is consistent with this district policy.

B-2. Upland Habitats: Much of the road will be constructed from existing upland trails. This policy assures that runoff volume, velocity, and sediment loads from the road and from construction activities do not cause accelerated erosion, and that natural drainage patterns, surface water quality, and natural groundwater recharge are retained. The policy also protects existing vegetation to minimize adverse impacts to slope stability or productivity of important upland habitats.

The project design incorporates culverts and step-pool structures to achieve the end point required in this policy. Stipulations 1 through 17 require additional measures that DOT/PF must take to minimize adverse impacts from these structures. Stipulations 19 and 20 require specific run-off control measures. As modified by these stipulations, the project is consistent with the district policy for upland habitats.

B-3. Maintenance of Fish Habitat: The L&PB policy for maintaining and enhancing fish habitat requires fish habitat be given the highest priority when evaluating projects that may impact fish spawning, migration, rearing, and overwintering areas. DFG reviewed this project to ensure fish habitat is not adversely affected. For example, the bridge was redesigned to ensure that the original stream bed contours were retained. Again, stipulations numbers 1 through 21 are intended to ensure the project is consistent with this district policy.

B-5. Drainage Structures and Maintenance of Fish Passage: Fish passage provisions of this district policy specifically address requirements for bridges and culverts. With the redesign of the instream portion of the bridge abutments and the stipulations for culverts across streams (numbers 1 through 5 and 10 through 13) and for the bridge (numbers 14 through 17) the project has been designed and sited to be consistent with this district policy.

A commenter expressed concern regarding stream flow, disturbance of spawning habitat, and the use of riprap. In the final design of the bridge, the riprap will be dug into the substrate so that its final elevation is at the same level as the river bed and will not cause a change in the direction or velocity of the stream flow. The identified stipulations will assure the necessary protection for fish passage.

B-12. Bank Stabilization: Bank stabilization is addressed in the project description and is specifically required through stipulation 19. The project has been designed and sited to be consistent with this district policy.

C-5. Discharge of Suspended and Settleable Solids: DFG, DEC, and L&PB specifically reviewed the project to ensure there would be no discharge of suspended or settleable solids that would adversely impact either fish or fish habitat. To ensure the project is consistent with this policy, the determination includes stipulations 17, 19, and 20.

D. Subsistence Use/Personal Use, D-2. Development Impacts and D-3. Access: These policies recognize that traditional subsistence activities are an extremely important use of the coastal resources in the Borough and give a high priority to maintenance of subsistence use areas and activities in areas of traditional use. Testimony at the public hearing by those who subsist in the area indicated wide-spread support for the road and bridge project. Opposition to the boat launch portion of the project was based on potential impacts with subsistence fish camps. However, opposition to the boat launch was not because access for subsistence would be curtailed, but concern that those launching boats would damage nearby camps, trash the area, and act inappropriately around bears. Prior to authorizing the potentially conflicting portion of the development, DOT/PF, in consultation with the Borough and fish and wildlife resource agencies, incorporated into the project description the installation of signage warning of private property and the need for proper disposal of refuse. The boat launch near the bridge also was retained as a "fall-back" in the event the City of Nondalton did not sign an agreement with DFG to construct a boat launch on Sixmile Lake. To date, no agreement has been signed.

As modified by the revised project description for the boat launch, the project is consistent with the L&PB subsistence policies. See also the assessment for the statewide subsistence standard (6 AAC 80.120).

E. Transportation and Utilities, E-1. Stream Crossings: This policy addresses bridges and culverts. Bridges and culverts were addressed previously in policy B-5. As with B-5, the project is consistent with the district policy for stream crossings.

E. Transportation and Utilities, E-2. Maintaining Traditional Public Access: This policy requires that restrictions on traditional methods and means of public access through municipal, state, and federal land be minimized. The road and bridge are designed to improve public access and is supported in the public testimony by residents of the district. Neither boat launch site would restrict traditional methods and means of public access. A new launch site would provide an alternative to current launching sites that cross private property. The proposed project enhances public access between Iliamna and Nondalton and provides a public boat launch facility in addition to the ones currently used.

E. Transportation and Utilities, E-4. Siting, Construction, and Operation: The road and bridge have been sited and designed, and should be constructed consistent with the elements of this district policy. Adverse impacts to habitats, biological resources, coastal resource uses, recreation, socio-economic characteristics, and traditional subsistence and personal use activities were minimized (see preceding analyses). The route follows an existing transportation corridor meeting the need to consolidate facilities. Crossings of resident and anadromous fish streams were minimized and consolidated along a single and existing road and trail system to reduce multiple impacts to an individual drainage, and the bridge design modified to minimize impacts.

A commenter addressed the requirement that, "to the extent feasible and prudent, transportation corridors and facilities shall be consolidated." The commenter contended that this road project should be coordinated with Cominco's proposed Pebble Beach mine project which may require a road at another location. The project review examined the relationship between the proposed road and a road that would serve Cominco's Pebble Beach Mine. The two projects are independent; the potential for ore to be mined is still being assessed. If the mine were to be developed, Cominco will consider other routes more appropriate to serve the mine. However, decisions on the feasibility of the mine and the route that would be used to transport the ore have not been made. A decision on the feasibility and prudence of consolidating the two roads will be made if and when Cominco submits its road plans. As noted above, the proposed route uses primarily existing roads and, for a short distance, an existing trail and therefore does meet the requirement to consolidate facilities. The project, as modified, is consistent with this district policy.

F-2. Development: The development policy requires that development incorporate appropriate designs and measures to mitigate significant adverse impacts to fisheries resources, recreational fishing, enhancement projects, subsistence or personal use fishing, or commercial fishing, in accordance with Policy A-2. The project was found consistent with policy A-2 and is consistent with policy F-2. (See analysis of policies A-2, A-5, B-3, B-5, D-2 and D-3.)

G-4. Erosion and G-5 Structural Erosion Control Measures: These L&PB policies address erosion control related to loss of existing vegetative cover and the siting, design and construction of structures and facilities located adjacent to waterbodies. Interference with natural shoreline processes was avoided in the redesign of the bridge abutments. Erosion control was addressed in Policy A-2, B-2, and specifically B-12. Stipulations 19 and 20 relate directly to modifications needed to control runoff and erosion. The project also is consistent with policies G-4 and G-5.

H-1 Protection of Recreation Values: The intent of this policy is to minimize adverse impacts to recreation resources and activities, including access or, if access is constrained, to provide alternative recreation opportunities or access. This analysis for the district policy is similar to the statewide standard for recreation (6 AAC 80.060). As modified by the project description and Stipulation 22, the project is consistent with this district policy.

One commenter raised concerns regarding the direct and indirect impacts of the project on the Newhalen River trout population -- an important recreational resource. While the stipulations contained in this consistency determination were not aimed specifically at trout population, the habitat protection provided by the stipulations protect the habitat for all species of fish. DFG does not anticipate that the recreational fishing value of the trout population would be diminished as a result of this project.

Consistency Decision

The Alaska Departments of Environmental Conservation, Fish and Game, and Natural Resources and the Lake and Peninsula Borough (L&PB) coastal district have reviewed your proposed project. Based on that review, the State concurs with your certification that the project is consistent with the ACMP with the following modifications, which will appear as stipulations on the State permits noted:

The following modifications are required for consistency with the ACMP and the statutory requirements of a Title 16 permit pursuant to AS 16.05.840:

For the culverted stream crossings at stations 55+700, 56+100, 56+560, 56+700, 57+358, and 57+517, and Lovers Creek:

1. Water shall bypass the work area and be supplied to the stream reach immediately downstream of the work area in a constant flow and in sufficient quantity to support the fish living in the stream.
2. Immediately upon dewatering the work area, any fish that are stranded shall be collected and returned unharmed to the stream reach containing a continuous supply of water.

3. The culvert shall be designed, installed, and maintained so that water velocity, flow, and any resulting drops in the water surface profile at any point within the culvert influence shall not impede the efficient passage of the slowest swimming fish group that occurs at the location of the proposed culvert installation.
4. The culvert shall be installed on a firm substrate. If necessary to obtain a solid foundation, peat or other unsuitable material shall be excavated to a solid substrate and the area backfilled with clean gravel prior to placement of the culverts.
5. Riprap placed in and along the banks of the stream channel must conform to the channel shape and be inset the design thickness so it will not constrict the channel. Alluvial gravel shall be layered on the inundated portions of the inlet and outlet aprons. The intent of the gravel is to accelerate deposition of finer grained material into the riprap voids, forcing the water to flow on top of the riprap instead of through it. The alluvial gravel should come from channel excavation activities or another source with similar gradation.

For the South Fork Alexcy Creek rock weirs:

6. The section of stream where rock weirs are installed shall be dewatered during excavation and rock installation operations. Water shall bypass the work area and be supplied to the stream reach immediately downstream of the work area in a constant flow and in sufficient quantity to support the fish living in the stream.
7. Immediately upon dewatering the work area, any fish that are stranded shall be collected and returned unharmed to the stream reach containing a continuous supply of water.
8. The rock weirs shall be constructed of stones large enough to withstand a 50-year flood event and not be washed away. They shall also be sealed to ensure that pools are created and that water flows over and not through the weir.
9. Each weir shall be equipped with a notch in which is installed a training wall designed to create a jet of water that attracts fish to the notch and enhances their ability to pass upstream.

The following modifications are required for consistency with the ACMP and the statutory requirements of a Title 16 permit pursuant to AS 16.05. 870:

For the Bear Creek culvert baffles and outlet apron:

10. All inwater work shall occur only during the period May 15 through July 15.
11. Water shall bypass the work area and be supplied to the stream reach immediately downstream of the work area in a constant flow and in sufficient quantity to support the fish living in the stream.
12. Immediately upon dewatering the work area, any fish that are stranded shall be collected and returned unharmed to the stream reach containing a continuous supply of water.
13. Riprap placed in and along the banks of the stream channel must conform to the channel shape and be inset the design thickness so it will not constrict the channel. Alluvial gravel shall be layered on the inundated portions of the inlet and outlet aprons. The intent of the gravel is to accelerate deposition of finer grained material into the riprap voids, forcing the water to flow on top of the riprap instead of through it. The alluvial gravel should come from channel excavation activities or another source with similar gradation.

For the Newhalen River bridge:

14. All inwater work shall occur only during the period May 15 through July 15.
15. Equipment servicing and refueling shall not be conducted below the ordinary high water level of the Newhalen River. Equipment leaking fuel, oil, hydraulic fluid or other pollutants shall not be operated below the ordinary high water level or moved on the shoreline or bed of the Newhalen River. Petroleum product spills shall be cleaned up immediately and contaminated earth, debris, or other materials shall be disposed of as required by Alaska Department of Environmental Conservation regulations.
16. Installation of the riprap on the east bank must be completed either when the site is naturally dewatered or when measures must be taken to isolate and dewater the site from the flowing water of the river. Prior to manually dewatering the site, a set of riprap blanket site dewatering and sediment control plans shall be forwarded to DFG.
17. The slurry and sediment laden water removed from each pile prior to filling with concrete must be collected and disposed in an approved area. Slurry and sediment laden water shall not be discharged into the Newhalen River.

The following modification will appear as a stipulation on the DNR Right-of-Way:

18. Equipment servicing and fueling operations must not occur within the annual floodplain (vegetation to vegetation line) or within 100 feet from any river, stream, drainage channel or waterbody. Petroleum products and hazardous materials must not be stored within 100 feet of water bodies. Stored petroleum products and hazardous materials must be placed within an impermeable diked area at 110 percent capacity of the largest independent fuel container. Manifolded tanks or bladders must be considered as a container.

The following modifications will appear as stipulations on all permits:

19. Each bank cut, slope, fill, bottoms of road side ditches, and exposed earth work attributable to the project, especially during culvert installation and road building activities, and at the east approach at the Newhalen River bridge, must be stabilized to prevent erosion both during and after project construction.
20. DOT/PF shall install silt fences or implement other methods as necessary to filter or settle suspended sediment from drainage wastewater from the roadway construction prior to direct or indirect discharge into exiting surface waters or wetlands. Any structure must be maintained until disturbed or deposited material has been stabilized against erosion. Special attention shall be given to collection and treatment of road embankment, road cut, and road surface runoff to the road-side ditches located at the bridge approach on the east side of the Newhalen River. Please note: this stipulation covers not only the construction phase of the project, but also the roadways permanent design.
21. Adequate sorbent materials (i.e., material that collects or absorbs petroleum products while at the same time repels water) must be kept on site to be used to contain and cleanup any spill of petroleum products.
22. The ability of all persons to use or access state land or public water shall not be restricted in any way.

Stipulations related to culvert installation, including sediment runoff, are necessary to protect water quality and fish habitat. They ensure consistency with the statewide standards for Habitats (6 AAC 80.130) and Air, Land, and Water Quality (6 AAC 80.140) and the Lake and Peninsula Borough Coastal Management Program (L&PB CMP) district policies including, A-2, Mitigation; A-5, Dredge and Fill Requirements; B-3, Maintenance of Fish Habitat; B-5, Drainage Structures and Maintenance of Fish Passage; B-12, Bank Stabilization; C-5, Discharge of Suspended and Settleable Solids; E-1 Stream Crossings; F-2 Development; and G-5, Structural Erosion Control Measures.

Stipulations related to installation of the rock weirs are necessary to protect fish and fish habitat per the statewide standard for habitats (6 AAC 80.130).

Stipulations related to road and bridge construction, including sediment runoff, are necessary to protect water quality and fish habitat. They ensure consistency with the statewide standards for habitats (6 AAC 80.130) and Air, Land, and Water Quality (6 AAC 80.140) and the Lake and Peninsula Borough Coastal Management Program (L&PB CMP) district policies including, A-2, Mitigation; A-5, Dredge and Fill Requirements; B-2, Upland Habitats; B-3, Maintenance of Fish Habitat; B-5, Drainage Structures and Maintenance of Fish Passage; B-12, Bank Stabilization; C-5, Discharge of Suspended and Settleable Solids; E-1 Stream Crossings; E-4(a), Siting, Construction, and Operation [of Transportation and Utilities]; F-2 Development; G-4 Erosion; and G-5, Structural Erosion Control Measures.

Stipulations related to storage and use of petroleum products and cleaning up spilled petroleum products are necessary to protect water quality and fish habitat. They ensure consistency with the statewide standards for Habitats (6 AAC 80.130) and Air, Land, and Water Quality (6 AAC 80.140) and the Lake and Peninsula Borough Coastal Management Program (L&PB CMP) district policies including, A-2, Mitigation; A-5, Dredge and Fill Requirements; B-3, Maintenance of Fish Habitat; B-12, Bank Stabilization; F-2 Development; and G-5, Structural Erosion Control Measures.

The stipulation related to use or access state land or public water assures traditional and customary access to subsistence or personal use areas is maintained. It is necessary for consistency with the ACMP district policies of L&PB CMP D-2, Development Impacts; D-3, Access and E-2, Maintaining Traditional Access.

This final consistency determination represents a consensus reached between you as the project applicant and the reviewing agencies listed above, regarding the conditions necessary to ensure the proposed project is consistent with the ACMP. We are informing the federal agency responsible for approving a federal authorization for your project that your original proposal has been modified subject to the conditions in this consistency determination.

I previously provided a copy of relevant ACMP standards and approved coastal district policies.

Advisories.

Please be advised that the DFG, Habitat and Restoration Division must be notified at 267-2333 at least 72 hours before commencement of pile driving and riprap installation operations. In addition, DFG must review details for several features of the project before final authorizations can be provided for several project features to ensure the project complies with Title 16 requirements and remains consistent with the ACMP. Features that require additional review include baffle designs for each culvert needing baffles; the rock weir designs for the South Fork

Alexcy Creek; project site dewatering and sediment control plans for installation of the culvert baffles, the culvert outlet and inlet aprons, and the Newhalen River riprap blanket; and control and treatment plans of sediment-laden water produced during pile driving operations.

Also be advised the L&PB concurs with the City of Nondalton that the public access for the boat ramp and launch should be located where there is less river current and less potential for erosion on the riverbank. However, if DFG and the City of Nondalton are not able to finalize arrangements for a boat launch within the city limits of Nondalton, the L&PB concurs that the State may continue to explore options on the west side of the Newhalen River near the bridge crossing.

Your consistency determination may include reference to specific laws and regulations, but this in no way precludes your responsibility to comply with all other applicable State and federal laws and regulations.

This consistency determination is ONLY for the project as described. If you propose any changes to the approved project, including its intended use, prior to or during its siting, construction, or operation, you must contact this office immediately to determine if further review and approval of the revised project is necessary. Changes may require amendments to this consistency determination or require additional authorizations.


If the proposed activities reveal cultural or paleontological resources, please stop any work that would disturb such resources and immediately contact the State Historic Preservation Office (907-269-8720) and the U.S. Army Corps of Engineers (907-753-2712) so that consultation per section 106 of the National Historic Preservation Act may proceed.

By copy of this letter I am informing the Corps of Engineers of DGC's final determination.

This final consistency determination is a final administrative decision for purposes of Alaska Appellate Rules 601-612. Any appeal from this decision to the superior court must be made within 30 days of the date of this determination.

If you have any questions regarding this process, please contact me at 907-269-7473 or email maureen_mccrea@gov.state.ak.us.

Sincerely,



Maureen McCrea
Senior Project Review Coordinator

cc:

Victor Ross, COE Regulatory, Anchorage
Stephanie Ludwig, DNR/SHPO, Anchorage
Karlee Gaskill, ACMP Liaison, DNR/DOL, Anchorage
Dan Golden, Permits Officer, DOT/PF, Anchorage
Don McKay, DFG/DHR, Anchorage
Tim Rumfelt, DEC, Anchorage
Terry Hoefflerle, Bristol Bay Native Association, Dillingham
Arne Erickson, Bristol Bay Borough, Naknek
Walt Wrede, Lake & Peninsula Borough, King Salmon
Geoffrey Parker, Anchorage

ADF&G Fish Habitat Permit

DEPARTMENT OF FISH AND GAME
HABITAT AND RESTORATION DIVISION

333 RASPBERRY ROAD
ANCHORAGE, ALASKA 99518-1599
PHONE: (907) 267-2100
FAX: (907) 267-2464

FISH HABITAT PERMIT FG 01-II-0074

ISSUED: March 2, 2001
EXPIRES: December 31, 2003

Ms. Carol Sanner
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, AK 99519-6900

Dear Ms. Sanner:

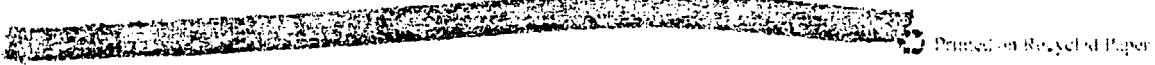
RE: Road/Bridge Construction and Culvert Retrofit Work
Newhalen River, Stream N^o 324-10-10150-2207, SE¹/₄ Section 1, T. 3 S., R. 33 W., S.M.
South Fork Alexey Creek, NW¹/₄ Section 6, T. 4 S., R. 32 W., S.M.
Lovers Creek, NW¹/₄ Section 13, T. 4 S., R. 33 W., S.M.
Bear Creek, Stream N^o 324-10-10150-2007-3016, SW¹/₄ Section 13, T. 4 S., R. 33 W., S.M.
SID AK 0002-12AA; COE N^o 2-830477; Newhalen River 4; ADL 227751 (Right-of-Way)
ADOT&PF Project N^o STP-0214(3)/511951

	ADT	ADL
JR	X	
SE	X	
SW		X
Hyd.		
Proj.	X	
Genl.	X	

51951

Pursuant to AS 16.05.870(b) and AS 16.05.840, the Alaska Department of Fish and Game (ADF&G) has reviewed supplemental preliminary design information provided by the Alaska Department of Transportation and Public Facilities (ADOT&PF) concerning subject project. The updated plans deal with culverted road crossings and instream work associated with construction of the road between Iliamna and Nondalton, Alaska. As originally reviewed, the project entailed upgrading a portion of the existing road on the east side of the Newhalen River and constructing a new road along the alignment of the existing trail on the west side of the Newhalen River between Iliamna and Nondalton, Alaska. Included in the project plan is construction of a pile-supported bridge across the Newhalen River. The bridge site is found in the SE¹/₄ SE¹/₄ Section 1, Township 3 South, Range 33 West, Seward Meridian. The preferred alternative identified in the project's environmental assessment includes (1) resurfacing, restoring, and rehabilitating the existing 14.4 mile long road between the Iliamna airport and the Newhalen River, (2) constructing a 653 foot-long, 18.6 foot-wide, one lane, six span, steel girder bridge over the Newhalen River, (3) building a new 1.7 mile long, 22 foot-wide, two lane, gravel surfaced road between the bridge and the existing Nondalton Road, and (4) resurfacing, restoring, and rehabilitating the existing road between Nondalton and the materials site located south of the village. The project plans are largely conceptual designs with actual final design plans yet to be developed.

Several changes in road alignment have occurred and project station locations have been revised and are used in the following project description. The existing road upgrade work between Iliamna and Alexey Creek is to include resurfacing, restoring and rehabilitating the roadway. Drainage problems including embankment erosion at low spots around culverts and at soft spots would be corrected. As needed, existing culverts would be repaired or replaced. The road embankments at the Bear Creek, Lovers Creek, and South Fork Alexey Creek crossings will be stabilized using tiers of gabions to create inlet and outlet headwalls. At Bear Creek (station number 38+877) a pair of baffles will be installed in



Printed on Recycled Paper

the existing culvert and an outlet apron of class II riprap extending 30 feet downstream of the outlet will be installed in the streambed. At Lovers Creek (station number 39+765) eight baffles will be installed in the existing culvert and an outlet apron of class II riprap extending 20 feet downstream of the outlet will be installed in the streambed. At the South Fork Alexey Creek (station 44+669), creating a series of step pools, using rock weirs, downstream of the culvert outlet would repair the outlet of the perched culvert. Conceptual plans for the step pools are included in the review materials; however, final design has not been completed. Eight baffles will also be placed inside the existing South Fork Alexey Creek culvert.

Between Alexey Creek and the materials site south of Nondalton, road improvements are to include reconstruction or installation of the roadway base and road surfacing, as well as installation, extension or replacement of culverts at several stream crossings. Culverted crossings of fish-bearing waters are identified at project stations 55+700 (formerly 55+720), 56+100 (formerly 56+113), 56+560 (formerly 56+709), 56+700 (formerly 56+780). Between Nondalton and the materials site south of the village, the existing road would be resurfaced and rehabilitated with two culverts to be replaced, one at station 57+358 (formerly 57+360) and the other at 57+517 (formerly 57+518).

At station 55+700 a 5-foot diameter, 83-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 9 feet upstream of the inlet and a class II riprap apron will be installed in the streambed for a distance of 15 feet downstream of the outlet. Baffles will be placed in the barrel of the culvert. At station 56+100 a 4-foot diameter, 83-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 9 feet upstream of the inlet and a class II riprap apron will be installed in the streambed for a distance of 12 feet downstream of the outlet. Baffles will be placed in the barrel of the culvert. At station 56+560 a 5-foot diameter, 54-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 5 feet upstream of the inlet and a class III riprap apron will be installed in the streambed for a distance of 15 feet downstream of the outlet. Baffles will not be placed in the barrel of this culvert. At station 56+700 a 5-foot diameter, 61-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 9 feet upstream of the inlet and a class III riprap apron will be installed in the streambed for a distance of 15 feet downstream of the outlet. Baffles will be placed in the barrel of the culvert. At station 57+358 an 8-foot diameter, 125-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 10 feet upstream of the inlet and a class II riprap apron will be installed in the streambed for a distance of 24 feet downstream of the outlet. Baffles will be placed in the barrel of the culvert. At station 57+517 a 4-foot diameter, 146-foot long culvert with class I concrete inlet and outlet headwalls would be used. A riprap apron of class I material will be installed in the streambed for a distance of 9 feet upstream of the inlet and a class II riprap apron will be installed in the streambed for a distance of 12 feet downstream of the outlet. Baffles will be placed in the barrel of the culvert. All of the culvert inlet and outlet riprap aprons will be underlain with geotextile fabric and will be installed to thickness' of at least 15.5 inches for class I riprap, 31 inches for class II riprap, and 46.5 inches for class III riprap. At each of these culvert inlets, riprap will also be placed on the road embankment from 4.5 to 5 feet above the culvert invert or to 11 inches above the top of the adjacent streambank, whichever is less. On the outlet of the culverts, riprap will also be placed on the road embankment from 3 to 4 feet above the culvert invert or to 11 inches above the top of the adjacent streambank, whichever is less. At all but one of these culverts,

baffles are proposed inside the culvert to accommodate fish passage. The baffle design, however, has not yet been developed.

The bridge superstructure would consist of four steel stringers supporting precast concrete deck panels. Five piers spaced about 118 feet apart would support the steel girders. Each pier consists of three 30-inch diameter steel pipe piles. Four of the piers would be located below the ordinary high water level of the river. Due to elevation differences between the east and west banks of the river, about 33 feet of the east bank would be excavated to lower the east end of the bridge thereby reducing the slope of the bridge's running surface. The bridge will slope at about 2.3 percent to the west. Plans included for review show that a 40-inch thick blanket of riprap would be placed below the ordinary high water level of the Newhalen River under the east end of the bridge. The estimated 136 cubic yards of riprap would be installed beneath the existing streambank and riverbed surface profiles so that the top of the riprap will not protrude above streambank or streambed contours.

The project includes a boat launch at the west side of the bridge. The preferred location for the boat launch is in the City of Nondalton. ADFG has agreed to partner with the city to construct a boat launch on Sixmile Lake as a point of access to the river and Lake Clark, which is upstream from Sixmile Lake. However, the city has not yet signed the agreement. ADOT&PF and ADF&G recognize that the public will access the river at the bridge both to fish and to launch boats if no nearby alternative is available. To ensure the riverbank is not damaged, ADOT&PF has retained the boat launch within the project description as a backup measure in the event the City of Nondalton does not provide a site within the city limits for the boat launch. At the bridge site, the launch would consist of a ramp of concrete planks that would be approximately 13 feet x 39 feet; a gravel launch access road that would be approximately 13 feet x 164 feet; and a gravel parking lot that would be approximately 65 feet x 118 feet.

If a boat launch is developed in the City of Nondalton, ADOT&PF will construct only a controlled vehicle parking area and an access trail at the bridge. The purpose of the access trail is to ensure that foot traffic likely to access the river from the bridge site does not break down the bank and lead to soil erosion and the subsequent degradation of water quality and adverse impacts to fish habitat.

The Newhalen River has been specified as being important for the spawning, rearing, or migration of anadromous fish pursuant to AS 16.05.870(a). In the vicinity of the bridge, the system supports sockeye salmon, arctic char, and several resident species of fish. In addition, Alexey Creek and Bear Creek have been specified as being important for the spawning, rearing, or migration of anadromous fish pursuant to AS 16.05.870(a). Both systems provide sockeye salmon spawning habitat and arctic char habitat. Resident species of fish such as grayling and rainbow trout are also found in several other streams crossed by the road. These streams include Lovers Creek, South Fork Alexey Creek, and unnamed streams at stations 55+700, 56+100, 56+560, 56+700, 57+358, and 57+517.

This project was reviewed for consistency with the standards of the Alaska Coastal Management Program (ACMP) and a final consistency determination was received from the Division of Governmental Coordination (DGC) on February 26, 2001. The finding contained the advisory that this consistency determination is ONLY for the project as described. If you propose any changes to the approved project, including its intended use, prior to or during its siting, construction, or operation, you must contact DGC immediately to determine if further review and approval of the revised

project is necessary. Changes (e.g. culvert designs) may require amendments to this consistency determination or require additional authorizations.

In accordance with AS 16.05.870(d), project approval is hereby given subject to the following stipulation(s):

For the Bear Creek culvert baffles and outlet apron:

All inwater work shall occur only during the period May 15 through July 15.

1. Prior to installation of the culvert baffles and the outlet apron, site dewatering and sediment control plans and baffle designs shall be forwarded to the ADF&G/Habitat and Restoration Division (H&R) for review and approval.
2. Water shall bypass the work area and be supplied to the stream reach immediately downstream of the work area in a constant flow and in sufficient quantity to support the fish living in the stream.
3. Immediately upon dewatering the work area, any fish that are stranded shall be collected and returned unharmed to the stream reach containing a continuous supply of water.
4. Riprap placed in and along the banks of the stream channel must conform to the channel shape and be inset the design thickness so it will not constrict the channel. Alluvial gravel shall be layered on the inundated portions of the inlet and outlet aprons. The intent of the gravel is to accelerate deposition of finer grained material into the riprap voids, forcing the water to flow on top of the riprap instead of through it. The alluvial gravel should come from channel excavation activities or another source with similar gradation.

For the Newhalen River bridge:

5. All inwater work shall occur only during the period May 15 through July 15.
6. Equipment servicing and refueling shall not be conducted below the ordinary high water level of the Newhalen River. Equipment leaking fuel, oil, hydraulic fluid or other pollutants shall not be operated below the ordinary high water level or moved on the shoreline or bed of the Newhalen River. Petroleum product spills shall be cleaned up immediately and contaminated earth, debris, or other materials shall be disposed of as required by Alaska Department of Environmental Conservation regulations.
7. Installation of the riprap on the east bank must be completed either when the site is naturally dewatered or when measures must be taken to isolate and dewater the site from the flowing water of the river. Prior to manually dewatering the site, a set of riprap blanket site dewatering and sediment control plans shall be forwarded to ADF&G/H&R Division for review and approval.

8. The slurry and sediment laden water removed from each pile prior to filling with concrete must be collected and disposed in an approved area. Slurry and sediment laden water shall not be discharged into the Newhalen River.
9. The ADF&G, H&R shall be notified at 267-2333 at least 72 hours before commencement of pile driving and riprap installation operations.
10. In the event it is necessary to install a boat launch and access ramp at the bridge, an amendment to this permit will be required. Prior to installation of the ramp and boat launch, a final set of design plans shall be forwarded to ADF&G for review and approval.

In accordance with AS 16.05.840, project approval is hereby given subject to the following stipulation(s):

For the culverted stream crossings at stations 55+700, 56+100, 56+560, 56+700, 57+358, and 57+517, and Lovers Creek:

11. Prior to installation of the culverts, culvert baffles, and inlet/outlet aprons, site dewatering and sediment control plans and baffle designs shall be forwarded to the ADF&G/H&R for review and approval.
12. Water shall bypass the work area and be supplied to the stream reach immediately downstream of the work area in a constant flow and in sufficient quantity to support the fish living in the stream.
13. Immediately upon dewatering the work area, any fish that are stranded shall be collected and returned unharmed to the stream reach containing a continuous supply of water.
14. The culvert shall be designed, installed, and maintained so that water velocity, flow, and any resulting drops in the water surface profile at any point within the culvert influence shall not impede the efficient passage of the slowest swimming fish group that occurs at the location of the proposed culvert installation.
15. The culvert shall be installed on a firm substrate. If necessary to obtain a solid foundation, peat or other unsuitable material shall be excavated to a solid substrate and the area backfilled with clean gravel prior to placement of the culverts.
16. Riprap placed in and along the banks of the stream channel must conform to the channel shape and be inset the design thickness so it will not constrict the channel. Alluvial gravel is to accelerate deposition of finer grained material into the riprap voids, forcing the shall be layered on the inundated portions of the inlet and outlet aprons. The intent of the gravel water is to flow on top of the riprap instead of through it. The alluvial gravel should come from channel excavation activities or another source with similar gradation.
17. Each bank cut, slope, fill, and exposed earthwork attributable to culvert installation and road building activities must be stabilized to prevent erosion both during and after project construction.

For the South Fork Alexey Creek rock weirs:

18. Prior to installation of the culvert baffles and the rock weirs, site dewatering and sediment control plans and baffle designs shall be forwarded to the ADF&G/H&R for review and approval.
19. The section of stream where rock weirs are installed shall be dewatered during excavation and rock installation operations. Water shall bypass the work area and be supplied to the stream reach immediately downstream of the work area in a constant flow and in sufficient quantity to support the fish living in the stream.
20. Immediately upon dewatering the work area, any fish that are stranded shall be collected and returned unharmed to the stream reach containing a continuous supply of water.
21. The rock weirs shall be constructed of stones large enough to withstand a 50-year flood event and not be washed away. They shall also be sealed to ensure that pools are created and that water flows over and not through the weir. Each weir shall be equipped with a notch in which is installed a training wall designed to create a jet of water that attracts fish to the notch and enhances their ability to pass upstream.

In addition, the following stipulations were adopted pursuant to 6 AAC 50 [Project Consistency with the Alaska Coastal Management Program (ACMP)] and are necessary to ensure that your project is consistent with the ACMP.

22. Each bank cut, slope, fill, bottoms of roadside ditches, and exposed earthwork attributable to the project, especially during culvert installation and road building activities, and at the east approach at the Newhalen River bridge, must be stabilized to prevent erosion both during and after project construction.
23. ADOT/PF shall install silt fences or implement other methods as necessary to filter or settle suspended sediment from drainage wastewater from the roadway construction prior to direct or indirect discharge into exiting surface waters or wetlands. Any structure must be maintained until disturbed or deposited material has been stabilized against erosion. Special attention shall be given to collection and treatment of road embankment, road cut, and road surface runoff to the roadside ditches located at the bridge approach on the east side of the Newhalen River.
24. Adequate sorbent materials (i.e., material that collects or absorbs petroleum products while at the same time repels water) must be kept on site to be used to contain and cleanup any spill of petroleum products.
25. The ability of all persons to use or access state land or public water shall not be restricted in any way.

The permittee is responsible for the actions of contractors, agents, or other persons who perform work to accomplish the approved plan. For any activity that significantly deviates from the approved plan, the permittee shall notify the ADF&G, Habitat and Restoration Division and obtain written approval in

the form of a permit amendment before beginning the activity. Any action taken by the permittee or an agent of the permittee that increases the project's overall scope or that negates, alters, or minimizes the intent or effectiveness of any stipulation contained in this permit will be deemed a significant deviation from the approved plan. The final determination as to the significance of any deviation and the need for a permit amendment is the responsibility of the ADF&G. Therefore, it is recommended that the ADF&G, Habitat and Restoration Division be consulted immediately when a deviation from the approved plan is being considered.

This letter constitutes a permit issued under the authority of AS 16.05.840, AS 16.05.870, and 6 AAC 50. This permit must be retained on site during road construction and related activities. Please be advised that this approval does not relieve you of the responsibility for securing other permits, state, federal, or local.

Pursuant to 6 AAC 80.010 (b), the conditions of this permit are consistent with the Standards of the Alaska Coastal Management Program and the Lake and Peninsula Borough Coastal Management Program.

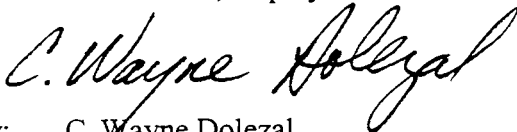
In addition to the penalties provided by law, this permit may be terminated or revoked for failure to comply with its provisions or failure to comply with applicable statutes and regulations. The department reserves the right to require mitigation measures to correct disruption to fish and game created by the project and which were a direct result of the failure to comply with this permit or any applicable law.

The recipient of this permit (the permittee) shall indemnify, save harmless, and defend the department, its agents, and its employees from any and all claims, actions or liabilities for injuries or damages sustained by any person or property arising directly or indirectly from permitted activities or the permittee's performance under this permit. However, this provision has no effect if, and only if, the sole proximate cause of the injury is the department's negligence.

This permit decision may be appealed in accordance with the provisions of AS 44.62.330--44.62.630.

Sincerely,

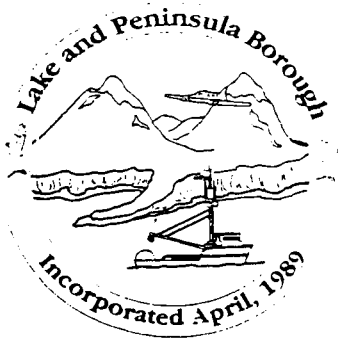
Robert G. Bosworth, Deputy Commissioner



By: C. Wayne Dolezal
Habitat Biologist
Region II
(907) 267-2333

cc:	M. McCrea, OMB/DGC	P. Janke, ADOT&PF	W. Wrede, L&PB
	R. Stefanich, ADOT&PF	M. Eagleton, NMFS	V. Ross, COE
	S. Morstad, ADF&G	K. Weiland, ADF&G	D. Dunaway, ADF&G
	D. Sellers, ADF&G	K. Gaskill, DNR/DMLW	T. Rumfelt, DEC
	G. Wheeler, USFWS/WAES		

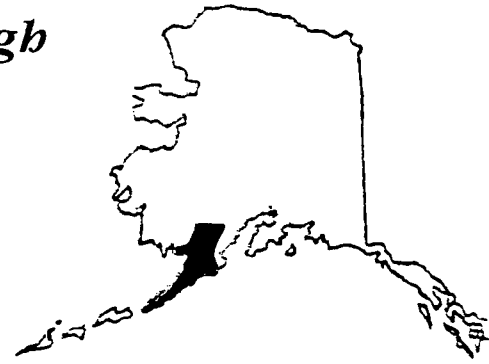
L&PB Development Permit



Lake and Peninsula Borough

P.O. Box 495
King Salmon, Alaska 99613

Telephone: (907) 246-3421
Fax: (907) 246-6602



February 14, 2000

Department of Transportation and Public Facilities
Statewide Design & Engineering Services
Preliminary Design and Environmental
4111 Aviation Avenue
PO Box 196900
Anchorage, Alaska 99519-6900

Subject: Development Permit for Iliamna-Nondalton Road and Newhalen River Bridge Project No. 51951

Dear Ms. Sanner,

This letter is in response to your letter dated December 20, 1999 concerning your application for a Development Permit for the Iliamna-Nondalton Road and Newhalen River Bridge Project No. 51951. On February 7, 2000 the Lake and Peninsula Borough Planning Commission held a public hearing for comment on this project. There were no comments received during the public hearing. The Planning Commission elected to issue a development permit for this project pursuant to our code and contingent that all other permits must be first approved. We are aware the U.S. Coast Guard has the same policy and defer to them for their final development permit.

The Planning Commission concurs with the project as planned with one exception and that is the location of the public access for the boat ramp and launch. The Commission concurs with the City of Nondalton's proposal that the boat ramp and launch be in another location and not as shown in this plan. The location of the boat ramp selected by the City of Nondalton is much safer with less river current and will mitigate possible erosions concerns on the riverbank adjacent to the bridge location caused by public access. Based on the information submitted, the Planning Commission found the project to be consistent with the Borough's Coastal Management Plan, and has approved your request for a development permit with the above noted stipulations.

This letter will serve as a **Development Permit** for the Iliamna-Nondalton Road and Newhalen River Bridge Project No. 51951, pursuant to Chapter 9.07 of the Lake and Peninsula Borough Municipal Code. Please be aware that you must notify the Borough is the actual construction on this project differs significantly from the plans reviewed by the Borough Planning Commission.

RECEIVE

Thank you for your cooperation with the Lake and Peninsula Borough. If you have any questions or need additional information please contact me at 907-246-3421.

FEB 18 '00

Sincerely,

Marv Smith
Marv Smith
Community Development Coordinator

cc: Planning Commission

Prelim. Design & Environmental Section	COMP
PD&E Eng.	/
Project Mgr	D. Chappell
Env. Coord	JR 1
Env. Team Leader	/
Staff	CS /
Hydrologist	
Project File	
Central File	/

ADNR Early Entry Authorization

**STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF MINING, LAND AND WATER
SOUTHCENTRAL REGION LAND SECTION**

**SPECIAL STIPULATIONS
State of Alaska Department of Transportation & Public Facilities
Newhalen River Bridge Project STP-0214(3)/51951
ADL 227751**

Attachment "A"

The State of Alaska Department of Transportation & Public Facilities (DOT/PF), requests authorization to enter upon state land/water for the purpose of constructing of a bridge across the Newhalen River and a boat launch ramp adjacent to the west bridge abutment of the proposed bridge below ordinary high water. This bridge is in conjunction with the road project (approximately 16 miles) between the Southwestern communities of Nondalton, Newhalen and Iliamna. The Alaska Department of Fish and Game (ADF&G) and the City of Nondalton have agreed to partner to construct a boat launch on Sixmile Lake for public use. In the event that the City of Nondalton does not provide an alternate site for the boat launch, DOT/PF will build the public boat launch ramp. *The future transportation use of the permitted area will in no way invoke the protections provided under 23 USC Section 138.* *Red*

The proposed right-of-way being requested for the bridge is 300 feet in width and approximately 475 feet in length located within Section 1, Township 3 South, Range 33 West, Seward Meridian, encompassing 3.3 acres, more or less, as depicted on location map identified Exhibit "A".

I. DEFINITIONS

- A. "Division of Mining, Land and Water (DMLW) Authorized Officer (AO)" means the Regional Manager, Southcentral Regional Office, Land Section, or his delegate.
- B. "Applicant" means State of Alaska Department of Transportation & Public Facilities (DOT/PF), it's officers, agents, contractors, subcontractors or their employees.
- C. "Project Area", is as indicated on the project plans attached as Exhibit "B"
- D. The easement to be granted as a result of the successful completion of this EEA will be designated as a public right-of-way.

II. GENERAL STIPULATIONS

- A. Federal, State and Local Laws and Regulations
 - 1. The applicant shall comply with all applicable federal, state and local laws and regulations, existing or hereafter adopted, affecting in any manner, construction of this project.
 - 2. Should the applicant or it's contractors require any water use for construction purposes from area streams, lakes or wells, a temporary water use permit will be required. Contact the Public Information Center at (907) 269-8400.

B. Liability - See Indemnity and Insurance - Exhibit "C"

C. Changes in Conditions

Unforeseen conditions arising during construction of the project may make it necessary to revise or amend these special stipulations. In this event, the AO and the permittee will attempt to agree as to what revision or amendments must be made. If they are unable to agree, DMLW Director shall have final authority to determine those revisions or amendments.

D. Valid Existing Rights

This EEA, and the rights and privileges granted by it, is subject to all valid existing rights in and to the land which is the subject to this authorization. DMLW makes no representations or warranties either express or implied as to the existence, number or nature of any valid existing rights.

E. Requests for Data

For purposes of information and review, the DMLW at any time during normal business hours, may require the applicant to furnish data related to preconstruction or construction activities undertaken in connection with the project. The applicant shall furnish the required data as soon as possible or as otherwise required under the terms of the EEA.

F. Proper Location

Issue of this EEA is authorization on state land only and does not authorize any activities on federal lands, private lands, native lands, or lands selected and approved to municipalities or boroughs. The applicant is responsible for proper location on site.

G. Survey

1. The applicant shall submit an as-built survey on or before the expiration date of this EEA or submit recorded right-of-way plans with adequate monumentation acceptable to DNR/DMLW. Plans must show relationship of the road right-of-way to DNR managed lands and shall note ADL file number, length, width and acreage of project area requiring DNR/DMLW authorization.
2. All survey monuments, witness corner, reference monuments, mining claims posts, bearing trees and unsurveyed lease corner posts shall be protected against damage, destruction or obliteration. Any damaged, destroyed or obliterated markers must be re-established in accordance with accepted survey practices of the division at the expense of the applicant.

H. Fine Tuning

Any changes in the alignment of the project area will require the prior written approval of the AO. The AO reserves the discretionary authority to require a re-determination of the state's best interest for any significant proposed changes.

I. Revocation, Termination or Abandonment

Upon revocation or termination of this EEA or abandonment of any section of the project area, the applicant shall remove all improvements and restore the land to the satisfaction of the AO within thirty (30) days.

J. Fees

There is a one-time Use Fee per Alaska Regulation 11 AAC 05. The current fee is \$50.00 per acre based on the approved as-built survey. The estimated fee for this ROW is a one-time charge of \$200.00 that is due prior to the issuance of the EEA. This fee will be readjusted, if needed, based on the survey approved by the DMLW.

There will also be a \$75.00 document handling fee.

K. Performance Guarantees

1. DOT/PF shall assure that its contractors, subcontractors or their employees shall purchase and maintain in force at all times during the performance of services under the contract appropriate required workers' compensation insurance, comprehensive (commercial) general liability insurance and comprehensive automobile liability insurance. Bonding required by DOT/PF from its contractor(s) for this project shall name State of Alaska as a named party. The bond is intended to recover any expenses DNR may incur if the site requires clean up/reclamation. Copies of confirmation of insurance and bonding must be provided to DOT/PF within 120 days from the date that DOT/PF awards its contract to its successful bidder (a copy will be sent to DNR/DMLW).

L. Alaska Coastal Management Program (ACMP). On February 23, 2001, the State Division of Governmental Coordination (DGC) found the project consistent with the ACMP with the following stipulations:

1. All inwater work shall occur only during the period May 15 through July 15.
2. Equipment servicing and refueling shall not be conducted below the ordinary high water level of the Newhalen River. Equipment leaking fuel, oil, hydraulic fluid or other pollutants shall not be operated below the ordinary high water level or moved on the shoreline or bed of the Newhalen River. Petroleum product spills shall be cleaned up immediately and contaminated earth, debris, or other materials shall be disposed of as required by Alaska Department of Environmental Conservation regulations.

3. Installation of the riprap on the east bank must be completed either when the site is naturally dewatered or when measures must be taken to isolate and dewater the site from the flowing water of the river. Prior to manually dewatering the site, a set of riprap blanket site dewatering and sediment control plans shall be forwarded to ADF&G.
4. The slurry and sediment laden water removed from each pile prior to filling with concrete must be collected and disposed in an approved area. Slurry and sediment laden water shall not be discharged into the Newhalen River.
5. Equipment servicing and fueling operations must not occur within the annual floodplain (vegetation to vegetation line) or within 100 feet from any river, stream, drainage channel or waterbody. Petroleum products and hazardous materials must not be stored within 100 feet of water bodies. Stored petroleum products and hazardous materials must be placed within an impermeable diked area at 110 percent capacity of the largest independent fuel container. Manifolded tanks or bladders must be considered as a container.
6. Each bank cut, slope, fill, bottoms of road side ditches, and exposed earth work attributable to the project, especially during culvert installation and road building activities, and at the east approach at the Newhalen River bridge, must be stabilized to prevent erosion both during and after project construction.
7. DOT/PF shall install silt fences or implement other methods as necessary to filter or settle suspended sediment from drainage wastewater from the roadway construction prior to direct or indirect discharge into exiting surface waters or wetlands. Any structure must be maintained until disturbed or deposited material has been stabilized against erosion. Special attention shall be given to collection and treatment of road embankment, road cut, and road surface runoff to the road-side ditches located at the bridge approach on the east side of the Newhalen River. Please note: this stipulation covers not only the construction phase of the project, but also the roadways permanent design.
8. Adequate sorbent materials (i.e., material that collects or absorbs petroleum products while at the same time repels water) must be kept on site to be used to contain and cleanup any spill of petroleum products.
9. The ability of all persons to use or access state land or public water shall not be restricted in any way.

III. ENVIRONMENTAL PROTECTION

A. Erosion Control/Water Quality

1. See ACMP Stipulations #6 and #7
2. DOT/PF shall conduct all operations in a manner that will minimize erosion.
Advisory: Any erosion must be repaired in a manner satisfactory to the AO at the applicant's expense within thirty (30) days of expiration of this authorization.

B. Oil Changes, Fueling and Storage

See ACMP Stipulation #5

C. Oil Spills

See ACMP Stipulation #8

Advisory: All oil and hazardous material spills must be cleaned up and reported per 11 AAC 75.080. Phone 800-478-9300 to report spills.

D. Waste Disposal

Advisory: All waste generated during construction activities under this letter-of-entry shall be removed or otherwise disposed of as required by state and federal law.

E. Antiquities and Historical Sites

Should archaeological, historical or paleontological resources be discovered as a result of or during the activities authorized, contact the State Historical Preservation Officer at Division of Parks and Outdoor Recreation, Office of History and Archaeology at 269-8721. Any field activities must not resume without the approval in writing by the AO.

IV. Vegetation

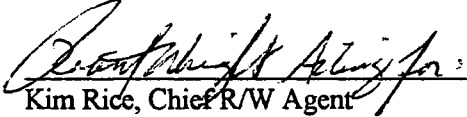
Clearing must be performed in a manner to minimize marring and scarring of the landscape. All reasonable precautions must be taken during operations to prevent damage to residual trees.

VI. Access - Limits of Authorization

- A. This EEA applies only to access within the project area and not access to the project area.
- B. No new access trails or roads are authorized on state lands without the express permission of the AO.
- C. DOTPF personnel must be on site to clearly identify the right-of-way line to the contractor's personnel prior to any clearing.
- D. See ACMP Stipulation #9

Authorized signature below is concurrence by State of Alaska Department of Transportation & Public Facilities to these Special Stipulations for the Early Entry Authorization.

This authorization expires on March 31, 2003.



Kim Rice, Chief R/W Agent
Department of Transportation
and Public Facilities



Title


4-5-01

Date

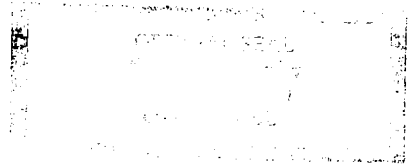
STATE OF ALASKA)
) ss
THIRD JUDICIAL DISTRICT)

THIS IS TO CERTIFY that on this 5th day of April, 2001
before the undersigned, a notary public in and for the State of Alaska, personally appeared before me
Robert Wright authorized representative subscribed to this instrument.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal, the day and year in this certificate first above written.



Notary Public in and for the State of Alaska
My Commission expires: 12-6-2002



**STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF MINING, LAND AND WATER
SOUTHCENTRAL REGION**

Adjudicator's Recommendation

**State of Alaska Department of Transportation and Public Facilities
Newhalen River Bridge Project STP-0214(3)/51951
Right-of-Way ADL 227751**

Requested Action: Department of Transportation & Public Facilities (DOT/PF) submitted a Right-of-Way (ROW) application for construction of a bridge across the Newhalen River with a boat launch ramp adjacent to the west bridge abutment of the proposed bridge below ordinary high water. This bridge is in conjunction with the road project (approximately 16 miles) between the Southwestern communities of Nondalton, Newhalen and Iliamna. The Alaska Department of Fish and Game (ADF&G) and the City of Nondalton have agreed to partner to construct a boat launch on Sixmile Lake for public use. In the event that the City of Nondalton does not provide an alternate site for the boat launch, DOT/PF will build the public boat launch ramp.

The proposed ROW is 300 feet in width and 475± feet in length, and encompasses 3.3± acres on state lands; located within Section 1, Township 3 South, Range 33 West, Seward Meridian, Alaska. (The boat launch ramp is below ordinary high water and will be approximately 13 feet in width and 20 feet in length and will be located within the proposed bridge right-of-way area previous described.

Legal Authority: AS 38.05.850, 11 AAC 53.300, 11 AAC 55.040 and 11 AAC 62.

Record: Right-of-Way Application ADL 227751

Background:

Project Overview.

This decision is to issue an Early Entry Authorization (EEA) to DOT/PF to enter upon state land/water for a bridge across the Newhalen River and a boat ramp on the west side.

To implement this decision an EEA will be issued to DOT/PF to facilitate site preparation and construction of the project.

This proposed EEA will expire approximately two years from the date the EEA is executed.

Title. The acquisition authority for submerged lands is found under the Submerged Lands Act of 1953 and the Equal footing Doctrine.

Classification. The area is within the Bristol Bay Plan. The Newhalen River is considered navigable. MCO 393 has been issued for the river. The management intent for Unit 8 for Lake Clark, Newhalen is for fish and wildlife harvest and habitat and indicates the Newhalen River should be managed for recreation and fisheries production with some community expansion encouraged for the area. The proposed use would be consistent with the plan.

Third Party Interest. None

History.

2/22/2000 Application received
3/3/2000 ACMP Review started by DGC. Notice was posted in Nondalton, Iliamna and Newhalen
3/5/2000 DNR published in Anchorage Daily News – comments due 4/5/2000 5 p.m.
4/5/2000 No comments received from the Anchorage Daily News notice
7/27/2000 Supplemental notice published in Anchorage Daily News (comments due by 8/29) and posted at Nondalton, Newhalen and Iliamna to include the boat ramp launch below ordinary high water (boat ramp launch not included in first notice)
8/25/2000 Received fax comments from Village Tribal Council stating DOTPF Option #3 was unanimously defeated as an option. (faxed copy to DOTPF and DGC).
8/29/2000 Received fax from the Nondalton Tribal Council (Resolution 2000-8.26) opposing Public Boat Launch and Parking Lot Adjacent to the Newhalen River Bridge.
8/29/2000 Comments due from supplement notice which included information on the boat launch ramp
2/23/2001 DGC issued the Final Consistency Determination for AK 0002-12AA

Issues: Public vs. private non-exclusive use. Because the project is a public use of state lands, it is recommended that the ROW be designated as a public ROW.

Width and Length. The proposed ROW for the bridge is 300 feet in width and approximately 475 feet in length as depicted on the map attached. (The proposed public boat launch ramp within the proposed area of the bridge below ordinary high water will be approximately 13 feet in width and 20 feet in length.)

Fee. State DOTPF will be charged a fee for the use this ROW according to the fee schedule established under 11 AAC 05. The current fee for a public right-of-way use is a one-time fee of \$50.00 per acre. Based on the proposed width and length indicated, the total acreage of the bridge and including the ramp would be approximately 3.3 acres with a one-time fee of \$200.00. The approved survey will determine the exact acreage.

There will also be a \$75.00 document handling fee to include recording of the document.

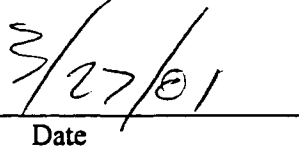
Term. The term of the right-of-way will be in perpetuity.

Recommendation: To improve access between communities is in the best interests and for the public in the State of Alaska. This proposed project would specifically improve health services, mail, fuel, food, transportation and overall improve the economy for the communities served. Therefore, it is recommended

that a Right-of-Way (with Early Entry Authorization being the interim document to allow for site development) be issued for the bridge and public boat launch project to DOTPF to coincide with the road improvements.

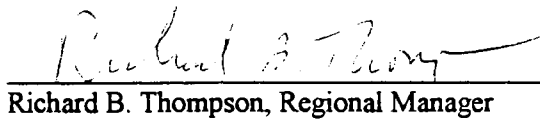


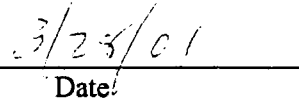
Linda Medeiros, NRO II

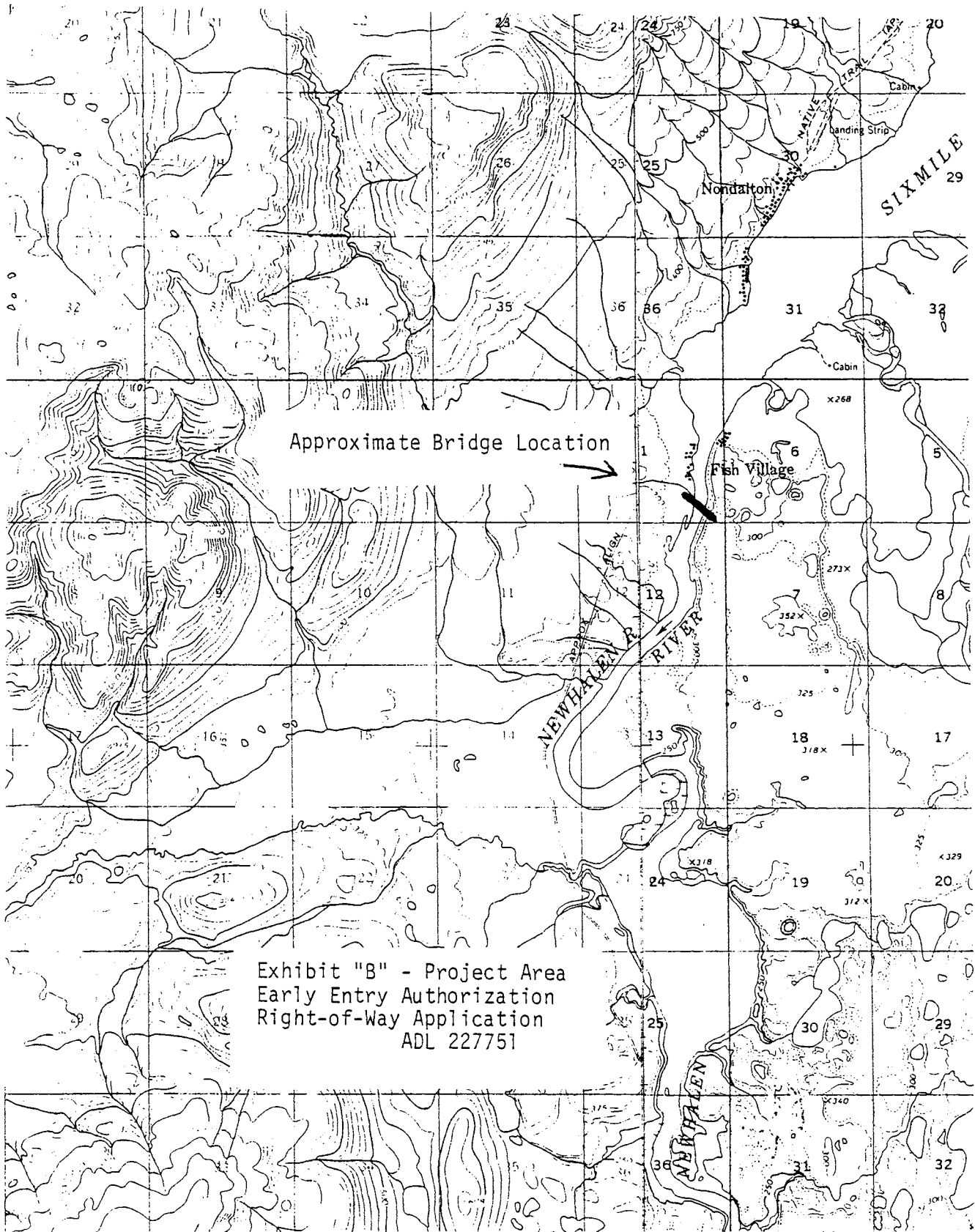

Date

I concur

I do not concur


Richard B. Thompson, Regional Manager


Date



Approximate Bridge Location

Exhibit "B" - Project Area
Early Entry Authorization
Right-of-Way Application
ADL 227751

SPECIAL STIPULATIONS

RIGHT-OF-WAY APPLICATION

ADL 227751

Department of Transportation & Public Facilities

INDEMNITY AND INSURANCE

Exhibit "C"

Indemnification:

To the extent allowed by law and subject to legislative appropriation, *RA*
The applicant* shall indemnify, hold harmless and defend the state, its officers, agents and employees from all liability, including costs and expenses, for all actions or claims resulting from injuries or damages sustained by any person or property arising directly or indirectly as a result of any error, omission or negligent act of the applicant* or anyone directly or indirectly employed by them in the performance of this project.

All actions or claims including costs and expense resulting from injuries or damages sustained by any person or property arising directly or indirectly from the performance of this project which are caused by the joint negligence of the state and the applicant* shall be apportioned on a comparative fault basis. Any such joint negligence on the part of the state must be a direct result of active involvement by the state.

Insurance:

Without limiting applicant* indemnification, it is agreed that the applicant* shall purchase at its own expense and maintain in force at all times during the performance of services under this agreement the following policies of insurance. Where specific limits are shown, it is understood that they shall be the minimum acceptable limits. If the applicant's * policy contains higher limits, the state shall be entitled to coverage to the extent of such higher limits. Certificates of Insurance must be furnished to the State prior to beginning work and must provide for a 30-day prior notice of cancellation, non-renewal or material change. Failure to furnish satisfactory evidence of insurance or lapse of the policy is a material breach and ground for termination of this project.

1. **Workers' Compensation Insurance:** the applicant* shall provide and maintain for all employees engaged in work on this project, Workers' Compensation Insurance as required by AS 23.30.045. This will include Worker's Compensation insurance coverage for any individual who directly or indirectly provides services for this project. This coverage must include statutory coverage for states in which employees are engaging in work and employers' liability protection not less than \$100,000 per person, \$100,000 per occurrence. Where applicable, coverage for all federal acts (i.e., U.S.L.&H. and Jones Acts) must also be included.
2. **Comprehensive (Commercial) General Liability Insurance:** with coverage limits not less than \$300,000 combined single limit per occurrence and annual aggregates where generally applicable and shall include premises-operations, independent contractor, products/completed operations, broad form property damage, blanket contractual and personal injury endorsements.
3. **Comprehensive Automobile Liability Insurance:** covering all owned, hired and non-owned vehicles with coverage limits not less than \$100,000 per person/\$300,000 per occurrence bodily injury and \$50,000 property damage.

*Applicant means Department of Transportation & Public Facilities, its officers, agents, contractors, subcontractors or their employees.

STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF MINING, LAND AND WATER

GENERAL SURVEY INSTRUCTIONS
EASEMENTS

Authority 11 AAC 53

These instructions define the survey and platting criteria unique to "**As-Built**" surveys of **minor projects** on state land for compliance with permit provisions. They provide the procedures for survey and graphical representation of the real property effected, complete enough that a particular position can be physically located or reestablished on the ground. These instructions are applicable only to minor projects constructed on state lands such as local access roads, trails, dikes, outfall lines, utilities etc. (hereinafter called "project"). Major projects crossing state/non-state land ownership boundaries such as collector roads or power transmission lines will require Special Survey Instructions issued by the Division.

1. GENERAL SURVEY STANDARDS

All land survey activities affecting the legal real property rights of the State of Alaska, the adjoining landowner, or both, shall be made in accordance with applicable laws, regulations, rules of procedures, and acceptable professional practices, and shall be performed under the supervision of a land surveyor licensed to practice in the State of Alaska. All survey work must be accomplished with equipment and procedures sufficient to insure at least the degree of accuracy prescribed in these instructions. Entry upon public or private land for survey purposes shall be in accordance with AS 34.65.020.

Location, "As-Built", surveys are metes and bounds type surveys and are ordinarily designated as Class IV Surveys under 11 AAC 53.110. Survey methods such as traverse, triangulation, trilateration for offshore operations, and differentially corrected Global Positioning System (DGPS) survey procedures, providing the minimum horizontal accuracy, are acceptable for easement centerline positioning; however, ties to real property boundaries where the project enters or leaves state land shall meet the requirements of Class III Surveys (1:5000).

- a. The "As-Built" or Post Construction survey is required to obtain the necessary dimensions for establishing a permanent record of the location of the project. **The "As-Built" drawing shall represent a post construction survey showing the project as constructed and shall not be a pre-construction plan of proposed improvement locations.** The survey shall be performed on the ground and the drawing shall:

1. Identify the centerline of the easement adequately enough that it can be easily and unmistakably traced along with the land title in the public records system, and;
 2. Give all the survey data necessary to locate the centerline, corners and angle points on the ground.
- b. Basis of bearings shall be a well-fixed boundary line of a survey of record or otherwise identified as being determined by a specific survey method such as GPS observed bearings. The type of bearings used (state plane or true) must be clearly noted on the as-built drawing.
- c. The as-built shall locate the project, and all associated facilities and their relationship to state land boundaries. Where the project being as-built intersects a surveyed line separating state and non-state ownership, ties to the nearest monumented corners defining the surveyed boundary line shall be made. All such ties shall be made along a property line and the point of intersection stationed (See Attachment 2). Appropriate ties to property lines shall be shown on the drawing.
- d. If the project is located entirely within state land ownership boundaries and start and/or end points are not tied to a monument of record, the latitude and longitude of the end points must be determined. The coordinates will be constrained to the National Spatial Reference System (NSRS). The latitude and longitude at the beginning and end points of the easement will be shown on the drawing along with the appropriate survey datum (i.e., NAD-83).
- e. All private land boundaries, survey monuments and other significant improvements such as roads, trails, etc., which are within 300 feet of the centerline of the project but not intersected by the centerline, shall be located and tied at right angles to a centerline station number and the offset from the centerline noted (i.e., 35' left of station 60+50.0) (See Attachment 2).
- f. For the as-built drawing; angle points are not needed at every minor bend in the project but, the entire improvement must lie within the specified width of the easement.
- g. Underwater utilities, pipeline, etc., must determine the line of MHW, or OHW and show distances and bearings from the MHW, or OHW line and along the underwater route.
- h. Show the wording Begin Project and End Project with an arrow at the beginning and the end of the project.

2. DRAFTING STANDARDS

- a. Format: The provided sample "As-Built" drawing is the format guide. The title block, vicinity map, legend, notes, surveyors seal, north arrow and graphics shall be shown substantially as indicated. Individual firm or company "Logo's", title blocks, certificates, notes, etc. are acceptable if in a reasonably similar format as the sample drawing. To protect against unauthorized alteration of the as-built drawing, the surveyor shall keep the original of the as-built and submit a copy on stable quality paper or mylar with an original stamp and signature.
- b. The as-built drawing shall be submitted on good quality paper stock no larger than 8 1/2" x 14" (standard legal size), or, if the document is a "Record of Survey", one of the standard State, Division of Mining, Land & Water plat sizes. If large plat sheets are produced, the state may also request that reduced (8 1/2"x 14") copies be made. Reduced copies must be legible and capable of being copied or converted into legible form by a machine.
- c. The as-built drawing will become an exhibit to a recorded document, it shall meet the standards set forth by 11 AAC 06.040 (Prerequisites for Recording Documents).
- d. All line work and lettering on the as-built drawing must be in black drafting ink and must be accomplished with mechanical lettering equipment.
- e. Drawing scale shall be in multiples of one inch to 10 or 100 feet per inch. If space allows, details should be shown on the sheet to which they apply.
- f. A vicinity map is required. It shall be at whatever scale is necessary to show the entire project and clearly indicate section, township, range and geographic information. The vicinity map should be on the first or second sheet as scale and scope of the project dictates. If multiple sheets are required, the vicinity map shall also indicate the coverage by each sheet. If more than two sheets are required to clearly show the project and vicinity map, the complete title block (see sample), legend, notes and surveyors certificate shall appear on the first sheet. All other sheets shall show ADL number, scale, sheet number/total number of sheets, location by section, township, range and the project to scale.
- g. Major topographic features and improvements such as streets, roads, highways, creeks, streams and rivers which will aid in orientation shall be located and labeled on the as-built drawing.
- h. The as-built drawing shall show all data necessary to indicate the mathematical dimensions and relationships of the boundary represented, with angles given directly or by bearings shown to at least the minute and the lengths of lines in feet shown to a tenth of a foot. Curve information shall include the length and radius of each curve. Bearing and distance ties shall be shown to an officially recognized monument that has

a known relationship to the rectangular survey system. **Acreage shall be calculated and based on portions of the permitted area which are on state lands only.** The acreage shall exclude any non-state land and shall be calculated to the thousandth of an acre.

- i. All property boundaries of record shall be shown with a narrow solid line. All non-boundary lines such as tie lines and easement limits shall be dashed lines. Industry standard centerline symbols shall be used for all right-of-way and easement centerlines. **The line depicting the subject project centerline shall be bolder than any other line on the as-built drawing.**
- j. The source for the basis of bearings shall be noted. If centerline information is not continuous or not shown on non-state land, a tie shall be shown between the separated segments which are on state land, or a new basis of bearing established.
- k. Each angle point on the centerline shall be clearly indicated and labeled with a P.I. number and stationing.
- l. Except for the ties and centerline information itself, all bearings and distances shall be labeled (R) for record, (M) for measured or (C) for computed.
- m. Section lines shall be shown whether they are surveyed or not.
- n. Ownership of land traversed by the project shall be labeled (i.e., state, private, native corporation, etc.), along with the subdivision lot and block designations, U.S. Survey number, tract, ASLS, section, aliquot part, etc.
- o. If permit boundaries are shown (right-of-way and easement limits) they shall be shortened or extended to meet at all angle points and at boundaries between state and non-state land (See Attachment 2).
- p. The graphics of the as-built drawing shall be oriented so that the north is as close as possible to the top of the sheet.

3. IMPROVEMENTS WITHIN A PARCEL

- a. Each object, structure or improvement placed within the permitted area shall be tied to at least one recovered record boundary. The tie should be at right angles to that boundary and if convenient, improvements should be referenced to the boundary they are closest to. Each tie to an improvement will consist of a distance along a property line from a monumented corner and a distance from the property line at right angles to the improvement.

- b. Any improvements of the permit which exist outside the permitted area shall be tied in the same manner as improvements within the permitted area if they are on state land.
- c. Encroachments which are not a part of the permit shall be tied in the same manner as all other improvements.
- d. Improvements such as power and telephone lines and roads which exit the permitted area shall be tied from the centerline to a monumented position along a property line.
- e. Improvements shall be dimensioned and labeled.

NOTES:

- 1. Ties to the mean high water line along centerline of easement where cable enters and exits water bodies. With latitude, longitude and reference to the basis of coordinates for each point (assuming that more than one reference point will be used for long cable lines).
- 2. Show protracted section lines on water bodies?
- 3. Show mean bearings and distances (assuming cable is laid in relatively straight segments).
- 4. Show latitude and longitude at _____ intervals.
- 5. Include a note explaining accuracy of the data. ie. 5-10 meters.
- 6. Show or explain if there is a difference in accuracy between where the cable is plowed and where it's just laying on the bottom.
- 7. Give a Lat., Long., where the right-of-way granted shall in any manner conflict with or overlap a previously granted right-of-way or easement.

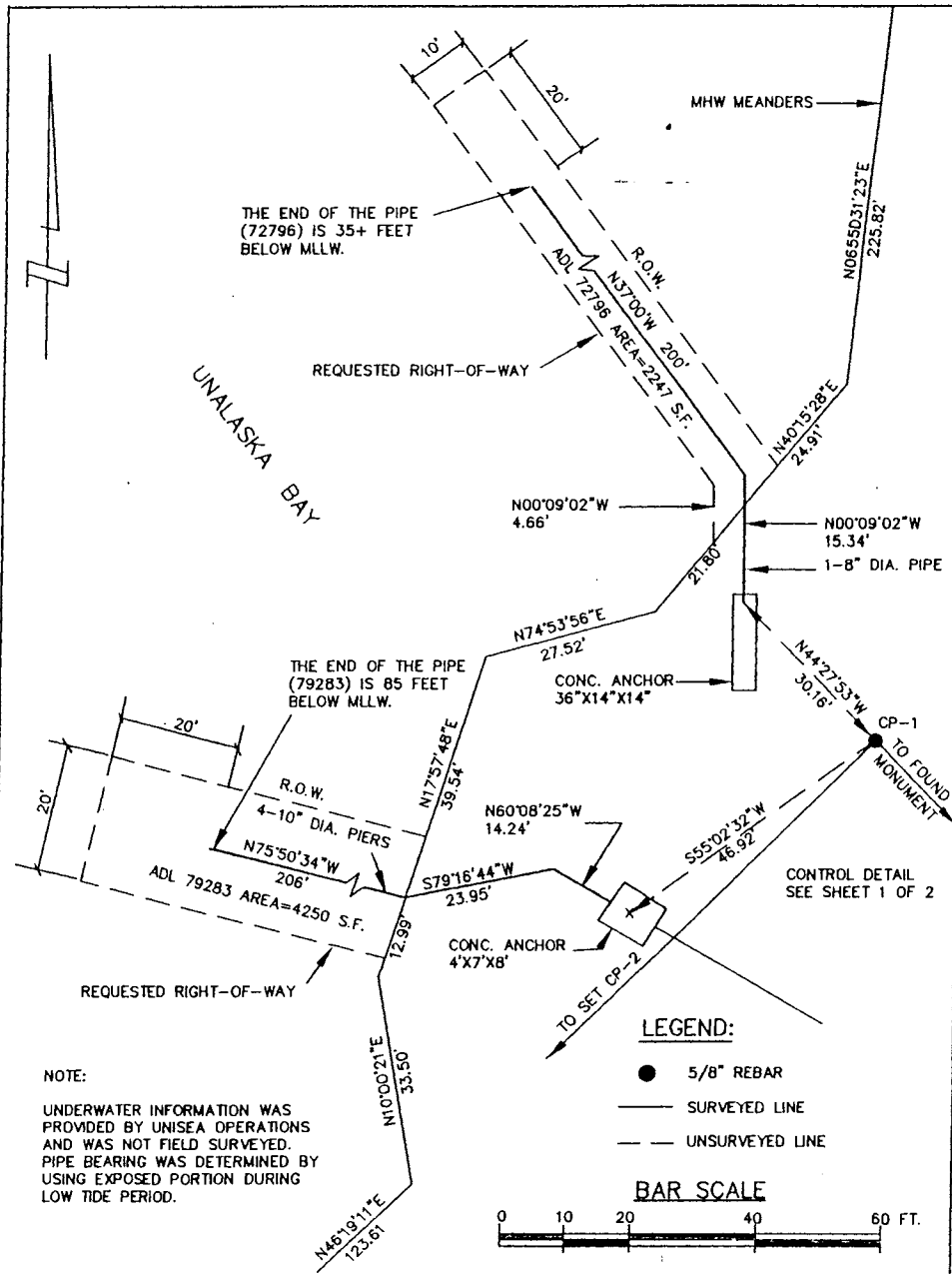
TYPICAL NOTES

(When applicable)

- 1. Right-of-way course values shown are True Mean Bearings and True Distances. reference monument bearings are True Bearings.
- 2. Grid coordinates shown are NAD 1927, Alaska State Plane Zone _____.
- 3. _____ Model _____ GPS receivers were used for positioning.
- 4. _____ Version _____ software was used for data reduction.
- 5. All position values shown were constrained to the NGS network.
- 6. All stationing shown is referenced to the back PI.
- 7. This survey was accomplished in accordance with AS _____ and GIS 98-_____.

8. Minimum bearing and distance closure of the upland portion is 1:5000.
9. Cable Right-of-way width is 50 feet, 25 feet each side of centerline.
10. It is herein understood that State approval signatures affixed to this plat does not certify to technical correctness, as the surveyors calculations, computations and field notes have not been reviewed and no **DOMLW** office mathematical survey closures have been accomplished. The State has reviewed only the legal description and this agrees with data displayed on the plat of survey as regards to the bearings and distances platted, and is in basic agreement with **DOMLW** Permit as issued to _____ . The above noted technical correctness is herewith noted as being entirely the surveyors responsibility.

SAMPLE

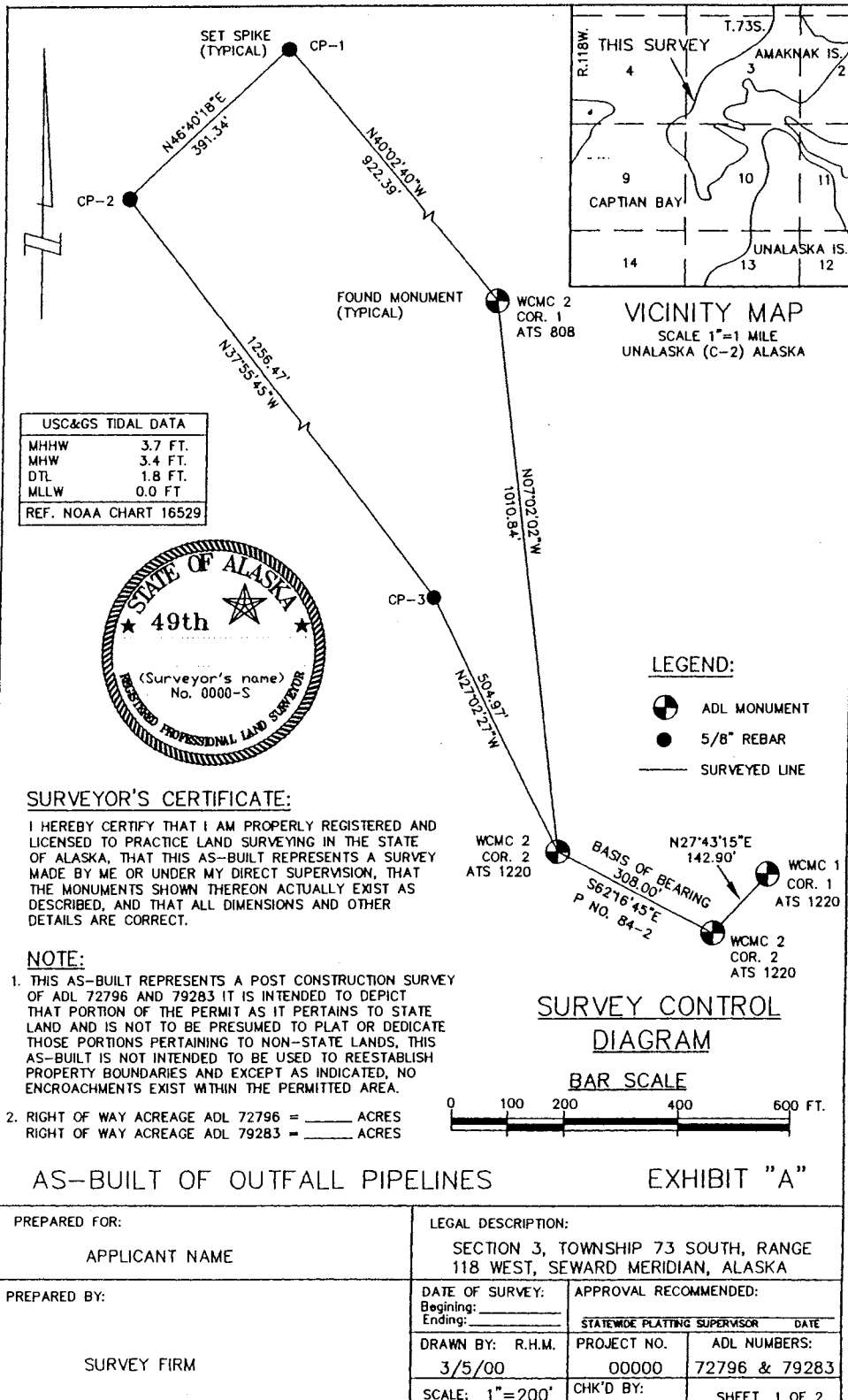


AS-BUILT OF OUTFALL PIPELINES

EXHIBIT "A"

<p>PREPARED FOR:</p> <p style="text-align: center;">APPLICANT NAME</p>	<p>LEGAL DESCRIPTION:</p> <p style="text-align: center;">SECTION 3, TOWNSHIP 73 SOUTH, RANGE 118 WEST, SEWARD MERIDIAN, ALASKA</p>		
<p>PREPARED BY:</p> <p style="text-align: center;">SURVEY FIRM</p>	<p>DATE OF SURVEY:</p> <p>Beginning: _____</p> <p>Ending: _____</p>	<p>APPROVAL RECOMMENDED:</p> <p style="text-align: center;">STATEWIDE PLATTING SUPERVISOR DATE</p>	
	<p>DRAWN BY: R.H.M.</p> <p style="text-align: center;">3/5/00</p>	<p>PROJECT NO.</p> <p style="text-align: center;">00000</p>	<p>ADL NUMBERS:</p> <p style="text-align: center;">72796 & 79283</p>
	<p>SCALE: 1"=20'</p>	<p>CHK'D BY:</p>	<p style="text-align: right;">SHEET 2 OF 2</p>

SAMPLE



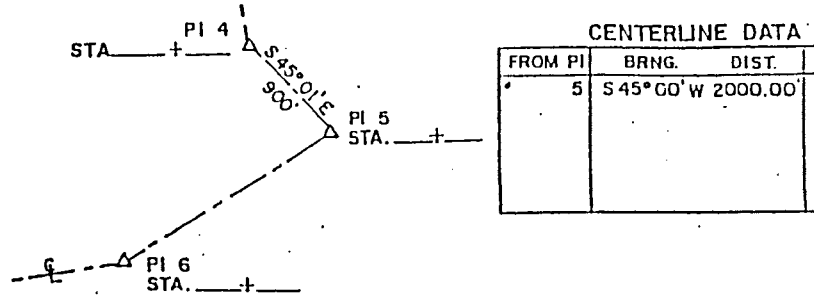
AS-BUILT OF OUTFALL PIPELINES

EXHIBIT "A"

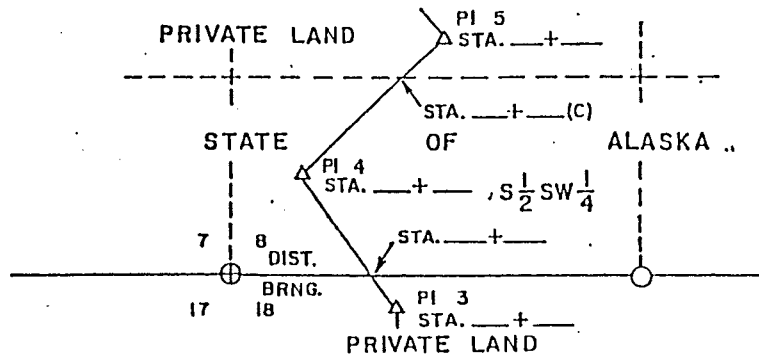
PREPARED FOR: APPLICANT NAME	LEGAL DESCRIPTION: SECTION 3, TOWNSHIP 73 SOUTH, RANGE 118 WEST, SEWARD MERIDIAN, ALASKA						
PREPARED BY: SURVEY FIRM	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"> DATE OF SURVEY: Beginning: _____ Ending: _____ </td> <td style="width: 50%;"> APPROVAL RECOMMENDED: STATEWIDE PLATTING SUPERVISOR DATE </td> </tr> <tr> <td> DRAWN BY: R.H.M. 3/5/00 </td> <td> PROJECT NO. ADL NUMBERS: 00000 72796 & 79283 </td> </tr> <tr> <td> SCALE: 1"=200' </td> <td> CHK'D BY: SHEET 1 OF 2 </td> </tr> </table>	DATE OF SURVEY: Beginning: _____ Ending: _____	APPROVAL RECOMMENDED: STATEWIDE PLATTING SUPERVISOR DATE	DRAWN BY: R.H.M. 3/5/00	PROJECT NO. ADL NUMBERS: 00000 72796 & 79283	SCALE: 1"=200'	CHK'D BY: SHEET 1 OF 2
DATE OF SURVEY: Beginning: _____ Ending: _____	APPROVAL RECOMMENDED: STATEWIDE PLATTING SUPERVISOR DATE						
DRAWN BY: R.H.M. 3/5/00	PROJECT NO. ADL NUMBERS: 00000 72796 & 79283						
SCALE: 1"=200'	CHK'D BY: SHEET 1 OF 2						

ATTACHMENT 2 - EXAMPLES OF AS-BUILT INSTRUCTION ITEM

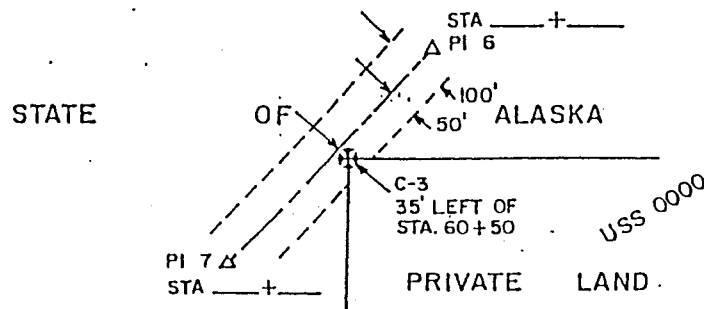
II K



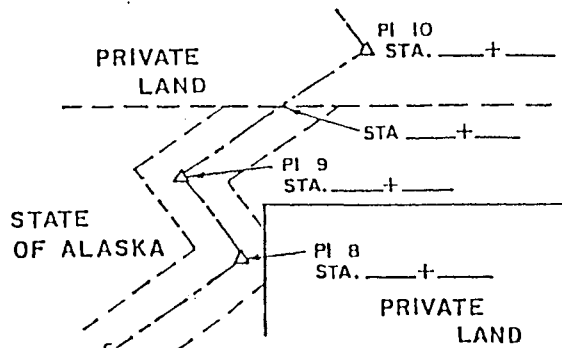
II N, P



II Q



II S



APPENDIX D

APPENDIX D

EA Availability Notification

EA Availability/Public Hearing Notification letter & mailing list.....	D-1
"What's Up" notification to Peg Tileston.....	D-3
Legislature Message.....	D-4
Anchorage Daily News Newspaper Ads.....	D-5
The Bristol Bay Times Newspaper Ad.....	D-7

Federal Agency Comment

National Marine Fisheries Service.....	D-8
--	-----

State Agency Comment

Department of Fish & Game.....	D-9
ADOT&PF Responses.....	D-15

Local Agency Comment

Lake and Peninsula Borough.....	D-16
ADOT&PF Responses.....	D-20
Iliamna Village Council.....	D-21
City of Nondalton.....	D-22
ADOT&PF Responses.....	D-23

Public Comments

Public Hearing Sign-In Sheets.....	D-24
Public Hearing Transcript.....	D-30
Petition for Project.....	D-40
Michael L. McKinney.....	D-43
ADOT&PF Responses.....	D-57
Claudine H. Greene.....	D-61
Nancy Delkittie.....	D-62
Elizabeth Balluta.....	D-63
Brenda Trefon.....	D-64
Jeremiah Hobson comments & DOT Response.....	D-66
George Alexie comments & DOT Response.....	D-67
Pete Trefon, Jr. comments & DOT Response.....	D-68
Diana Armstrong.....	D-69
Lydia K. Wilson comments & DOT Response.....	D-70
Gary Marttila comments & DOT Response.....	D-72
Melvin LeVeane.....	D-74
Lorene A. Anelon.....	D-77
Elia Anelon comments & DOT Response.....	D-78
Myrtle Anelon comments & DOT Response.....	D-79
Michael L. McKinney.....	D-80
William W. Trefon, Sr.....	D-82
Joanne Wassillie.....	D-84
Jerry Clay.....	D-85
Gregory Anelon, Jr.....	D-86
Peter John.....	D-87
Louise Anelon.....	D-88
Geoffrey Y. Parker.....	D-89
ADOT&PF Responses.....	D-110
Geoffrey Y. Parker.....	D-117
ADOT&PF Responses.....	D-149

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN AND ENVIRONMENTAL

TONY KNOWLES, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
(FAX) 243-6927 - TDD 269-0473
(907) 269-0528 or (907) 269-0542

January 25, 2000

Re: Iliamna-Nondalton Road Improvements
Project No. 51951

Environmental Assessment Review and
Public Hearing Notification

Mr. Victor O Ross
US Army Corps of Engineers
Regulatory Branch (1145b)
P.O. Box 898
Anchorage, AK 99506-0898

Dear Mr. Ross:

Enclosed for your review and comment is the Environmental Assessment (EA) for the Iliamna-Nondalton Road Improvement project. The Environmental Assessment was approved for public distribution by the Federal Highway Administration on January 20, 2000.

Three public hearings have been scheduled for this project. The hearings will follow the "open house" format where individuals or agencies can stop by any time during the hearing hours and talk to project personnel and if they chose, make a formal testimony. A short presentation will be given at each public hearing at the time noted.

- February 28, 2000 Iliamna Community Center 3:00 – 6:00 p.m. with a 4:00 p.m. presentation
- February 29, 2000 Nondalton Community Building 3:00 – 6:00 p.m. with a 4:00 p.m. presentation
- March 1, 2000 Anchorage ADOT&PF Building, 4111 Aviation Drive 4:00 – 7:00 p.m. with a 6:00 p.m. presentation

Comments on the EA are due by 4:00 p.m. March 13, 2000. If you have any questions or require additional information, please contact me or Susan Wick, Environmental Team Leader at 269-0530.

Sincerely,



Jerry O. Ruehle
Environmental Coordinator

Enclosure: Environmental Assessment

Mr. Geoffrey Y. Parker
Edgren & Associates
645 G Street, Ste 300
Anchorage, AK 99501

Mr. Paul Dusenbury
Bristol Environmental &
Engineering
201 E. 56th Avenue, Suite 301
Anchorage, AK 99518

Mr. Wayne Dolezal
Habitat Biologist
ADF&G
333 Raspberry Road
Anchorage, AK 99518-1599

Mr. Victor O. Ross
US Army Corps of Engineers
Regulatory Branch (1145b)
P.O. Box 898
Anchorage, AK 99506-0898

Mr. Walt Wrede
Lake & Peninsula Borough
P.O. Box 495
King Salmon, AK 99613

Ms. Ann G. Rappoport
Field Supervisor
U.S. Fish & Wildlife Service
605 West 4th Avenue, Room 62
Anchorage, AK 99501-2249

Mr. Tim Rumfelt
ADEC
555 Cordova Street
Anchorage, AK 99501

Mr. Gary Prokosch
Water Resources Section Chief
DNR, Mining & Water Mgt.
550 West 7th Avenue, Suite 900
Anchorage, AK 99501

Ms. Judith Bittner
SHPO, DPOR
550 West 7th Avenue, Suite 1230
Anchorage, AK 99501

Mr. Tom Greene
City of Nondalton
P.O. Box 89
Nondalton, AK 99640

Mr. Gerald Anelon
Iliamna Village Council
Box 286
Iliamna, AK 99606

Mr. Jim Helfinstine
U.S. Coast Guard
P.O. Box 25517
Juneau, AK 99802

Ms. Jeanne Hanson
National Marine Fisheries Service
222 West 7th Ave. #43
Anchorage, AK 99513-7577

Ms. Heather Dean
U.S. Environmental Protection
Agency
222 West 7th Ave., #19
Anchorage, AK 99513-7588

Ms. Susan Jarvis
Division of Gov't Coordination
550 W. 7th Avenue, Suite 1660
Anchorage, AK 99501

Mike McKinney
9715 Independence #101
Anchorage, AK 99507

Dale Tallman
1500 W. 46th Avenue
Anchorage, AK 99503

Ricky D. Del Kittie
PO Box 8
Nondalton, AK 99640
(907) 294-2209

Ken Arndt
Tidemark Corporation
PO Box 249
Homer, AK 99603

Mr. Henry Wilson
4830 Sportsman Drive
Anchorage, AK 99502

F. Robert Bell and Associates
Attn: Brian Harten, P.E.
801 W. Fireweed Lane Suite 200
Anchorage, AK 99503-1801

Catherine Shuman
27339 Golden Eagle Court
Chugiak, AK 99567-5125

Nicole
PN&D
Anchorage, AK
(A courier picked it up)

Gary Marttila
PO Box 24
Nondalton, AK 99640

Brent Petrie
Manager, Special Projects
Alaska Village Electric
Cooperative, Inc.
4831 Eagle Street
Anchorage, AK 99503

Recipients/
Addresses
for EA
Availability for
Iliamna -
Nondalton
Project 51951

Subject: ADOT&PF project
Date: Thu, 27 Jan 2000 08:14:54 -0900
From: Susan Wick <Susan_Wick@dot.state.ak.us>
To: pegt@alaska.net

Peg,
I'm attaching a copy of a newspaper ad we will be running in the Anchorage and Bristol Bay newspapers starting today for the availability of the EA and notification of 3 public hearings on the Iliamna-Nondalton Road Improvement project. Would you please put it in What's Up. If you need any additional information that isn't on the attachment please contact me. Thanks.

Susan Wick
ADOT&PF Environmental Team Leader

<input type="checkbox"/> newspaper.doc	Name: newspaper.doc Type: Winword File (application/msword) Encoding: base64
--	---



Notice of Availability of Environmental Assessment
and
Public Hearings
Iliamna-Nondalton Road Improvements
Project No. 51951

The Alaska Department of Transportation & Public Facilities (ADOT&PF) is proposing to improve overland access between the communities of Iliamna and Nondalton. The proposed project would:

- 1) resurface, restore, and rehabilitate the existing approximately 14.4 miles of roadway from Iliamna to the Newhalen River,
- 2) construct an approximately 653.2' long, 18.67' wide, one-lane, six span steel girder bridge over the Newhalen River,
- 3) improve approximately 1.7 miles of roadway/trail from the Newhalen River to the Nondalton material site, and
- 4) rehabilitate the existing approximately 0.6 mile roadway from the material site to Nondalton.

A draft Environmental Assessment (EA) has been prepared for the proposed project describing the alternatives considered and the probable economic, social and environmental effects of the proposed project. Interested individuals are encouraged to attend one of the following public hearings. The hearings will be held in the Open House format and participants may attend at any time during the scheduled hours. Short presentations will be given at the times noted.

Iliamna Community Center February 28, 2000 3:00 - 6:00 p.m. 4:00 p.m. presentation

Nondalton Community Building February 29, 2000 3:00 - 6:00 p.m. 4:00 p.m. presentation

ADOT&PF Building, 4111 Aviation Drive, Anchorage March 1, 2000 4:00 - 7:00 p.m. 6:00 p.m. presentation

If you would like a copy of the EA or require additional information, please contact Susan Wick, Environmental Team Leader at 269-0530 or at Susan_Wick@dot.state.ak.us. Written comments will be accepted at the address below until 4:00 p.m. March 15, 2000.

Jerry O. Ruehle
Environmental Coordinator
Preliminary Design and Environmental
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, AK 99519-6900

Persons with a hearing impairment can contact ADOT&PF at our Telephone Device for the Deaf (TDD) number 269-0475. We are able to offer, upon request, reasonable accommodations for special needs related to other disabilities.


Subject: Public Hearing Notification
Date: Fri, 28 Jan 2000 10:37:11 -0900
From: Susan Wick <Susan_Wick@dot.state.ak.us>
To: Representative Carl Moses <legis.state.ak.us>, Senator Lyman Hoffman <legis.state.ak.us>
CC: MICHAEL OBRIEN <MURPH_OBRIEN@DOT.STATE.AK.US>

To Representative Moses and Senator Hoffman

RE: Availability of draft Environmental Assessment and Notification of Public Hearings
ADOT&PF Iliamna-Nondalton Road Improvement Project
Project No. 51951

Attached to this message is a copy of a newspaper ad that will run in the Anchorage Daily News and the Bristol Bay Times three times each notifying folks of the availability of the draft Environmental Assessment and upcoming public hearings in Iliamna, Nondalton and Anchorage for the Iliamna-Nondalton Road Improvement project.

If you have any questions regarding the attachment, or the project, please contact Murph O'Brien, Staff Assistant to ADOT&PF's Central Region Director at 269-0770 or Murph_OBrien@dot.state.ak.us.

 newspaper.doc

Name: newspaper.doc
Type: Winword File (application/msword)
Encoding: base64



Notice of Availability of Environmental Assessment and Public Hearings Iliamna-Nondalton Road Improvements Project No. 51951

The Alaska Department of Transportation & Public Facilities (ADOT&PF) is proposing to improve overland access between the communities of Iliamna and Nondalton. The proposed project would:

- 1) resurface, restore, and rehabilitate the existing approximately 14.4 miles of roadway from Iliamna to the Newhalen River,
- 2) construct an approximately 653.2' long, 18.67' wide, one-lane, six span steel girder bridge over the Newhalen River,
- 3) improve approximately 1.7 miles of roadway/trail from the Newhalen River to the Nondalton material site, and
- 4) rehabilitate the existing approximately 0.6 mile roadway from the material site to Nondalton.

A draft Environmental Assessment (EA) has been prepared for the proposed project describing the alternatives considered and the probable economic, social and environmental effects of the proposed project. Interested individuals are encouraged to attend one of the following public hearings. The hearings will be held in the Open House format and participants may attend at any time during the scheduled hours. Short presentations will be given at the times noted.

Iliamna Community Center
February 28, 2000
3:00 - 6:00 p.m.
4:00 p.m. presentation

Nondalton Community Building
February 29, 2000
3:00 - 6:00 p.m.
4:00 p.m. presentation

ADOT&PF Building, 4111 Aviation Drive, Anchorage
March 1, 2000
4:00 - 7:00 p.m.
6:00 p.m. presentation

If you would like a copy of the EA or require additional information, please contact Susan Wick, Environmental Team Leader at 269-0530 or at Susan_Wick@dot.state.ak.us. Written comments will be accepted at the address below until 4:00 p.m. March 13, 2000.

Jerry O. Ruehle
Environmental Coordinator
Preliminary Design and Environmental
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, AK 99519-6900

Persons with a hearing impairment can contact ADOT&PF at our Telephone Device for the Deaf (TDD) number 269-0473. We are able to offer, upon request, reasonable accommodations for special needs related to other disabilities.

Susan W

PROOF OF PUBLICATION

STOF0125

103998

AO 237308

AO Order - 25-7308

S. Alston
 being first duly sworn on oath
 deposes and says that he/she
 is an accounting clerk of
 the Anchorage Daily News, a
 daily newspaper. That said
 newspaper has been approved as
 a proof of publication and it now
 and has been published in the
 English language continually as a
 daily newspaper in Anchorage,
 Alaska, and it is now and during
 all said time was printed in an
 office maintained at the aforesaid
 place of publication of said
 newspaper. That the annexed is
 a copy of a display ad
 as it was published in regular
 issues (and not in supplemental
 form) of said newspaper on
 1/27/00

and that such newspaper was
 regularly distributed to its
 subscribers during all of said
 period. That the full amount of
 the fee charged for the foregoing
 publication is not in excess of
 the rate charged private
 individuals.

Signed S. Alston



Notice of Availability of Environmental Assessment
 and
 Public Hearings
Iliamna-Nondalton Road Improvements
 Project No. 51951

The Alaska Department of Transportation & Public Facilities (ADOT&PF) proposing to improve overland access between the communities of Iliamna and Nondalton. The proposed project would:

- 1) resurface, restore, and rehabilitate the existing approximately 14.4 miles roadway from Iliamna to the Newhalen River,
- 2) construct an approximately 653.2' long, 18.67' wide, one-lane, six span steel girder bridge over the Newhalen River,
- 3) improve approximately 1.7 miles of roadway/trail from the Newhalen River to the Nondalton material site, and
- 4) rehabilitate toe existing approximately 0.6 mile roadway from the material site to Nondalton.

A draft Environmental Assessment (EA) has been prepared for the proposed project describing the alternatives considered and the probable economic, social and environmental effects of the proposed project. Interested individuals are encouraged to attend one of the following public hearings. Hearings will be held in the Open House format and participants may attend any time during the scheduled hours. Short presentations will be given at the times noted.

Iliamna Community Center
 - February 28, 2000
 3:00-6:00 p.m.
 4:00 p.m. presentation

Nondalton Community Center
 February 29, 2000
 3:00-6:00 p.m.
 4:00 p.m. presentation

ADOT&PF Building, 4111 Aviation Drive, Anchorage
 March 1, 2000
 3:00-7:00 p.m.
 6:00 p.m. presentation

If you would like a copy of the EA or require additional information, please contact Susan Wick, Environmental Team Leader at 269-0530 or Susan.Wick@dot.state.ak.us. Written comments will be accepted at the address below until 4:00 pm. March 13, 2000.

Jerry O. Ruehle
 Environmental Coordinator
 Preliminary Design and Environmental
 Alaska Department of Transportation and Public Facilities
 D-5 P.O. Box 196900
 Anchorage, AK 99519-6900

Persons with a hearing impairment can contact ADOT&PF at our Telephone Device for the Deaf at 269-0530. We will make reasonable accommodations for special needs.

PROOF OF PUBLICATION

STOF 0125
104251
2 X 8

VENUS SALAZA being first duly sworn deposes and says that it is an accounting clerk at the Anchorage Daily newspaper. The newspaper has been a proof of publication and has been published in English language daily newspaper in Alaska, and it is not all said time was printed in office maintained a place of publication newspaper. That is a copy of an advertisement as it was published in issues (and not in form) of said newspaper. MARCH and that such newspaper regularly distributed subscribers during period. That the fee charged for publication is not the rate charged prior individuals. 1/1

Signed _____



Notice of Availability of Environmental Assessment and Public Hearings Iliamna-Nondalton Road Improvements Project No. 51951

The Alaska Department of Transportation & Public Facilities (ADOT&PF) is proposing to improve overland access between the communities of Iliamna and Nondalton. The proposed project would:

- 1) resurface, restore, and rehabilitate the existing approximately 14.4 miles of roadway from Iliamna to the Newhalen River,
- 2) construct an approximately 653.2' long, 18.67' wide, one-lane, six span steel girder bridge over the Newhalen River.
- 3) improve approximately 1.7 miles of roadway/trail from the Newhalen River to the Nondalton material site, and
- 4) rehabilitate the existing approximately 0.6 mile roadway from the material site to Nondalton.

A draft Environmental Assessment (EA) has been prepared for the proposed project describing the alternatives considered and the probable economic, social and environmental effects of the proposed project. Interested individuals are encouraged to attend one of the following public hearings. The hearings will be held in the Open House format and participants may attend at any time during the scheduled hours. Short presentations will be given at the times noted.

Iliamna Community Center
February 28, 2000
3:00-6:00 p.m.
4:00 p.m. presentation

Nondalton Community Center
February 29, 2000
3:00-6:00 p.m.
4:00 p.m. presentation

ADOT&PF Building, 4111 Aviation Drive, Anchorage
March 1, 2000
4:00-7:00 p.m.
6:00 p.m. presentation

If you would like a copy of the EA or require additional information, please contact Susan Wick, Environmental Team Leader at 269-0530 or Susan Wick@dot.state.ak.us. Written comments will be accepted at the address below until 4:00 pm, March 13, 2000.

Jerry O. Ruehle
Environmental Coordinator
Preliminary Design and Environmental
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, AK 99519-6900

Persons with a hearing impairment can contact ADOT&PF at our Telephone Device for the Deaf (TDD) number 269-0473. We are able to offer, upon request, reasonable accommodations for special needs related to other disabilities.

ety, preserve roads ready in place, improve efficiency, level of service, flexibility and adaptability and to enhance and protect resources.



**Notice of Availability of Environmental Assessment
and
Public Hearings
Iliamna-Nondalton Road Improvements
Project No. 51951**

BRISTOL
BAY
TIMES
1/27/00

The Alaska Department of Transportation & Public Facilities (ADOT&PF) is proposing to improve overland access between the communities of Iliamna and Nondalton. The proposed project would:

- 1) resurface, restore and rehabilitate the existing approximately 14.4 miles of roadway from Iliamna to the Newhalen River,
- 2) construct an approximately 653.2' long, 18.67' wide, one-lane, six span steel girder bridge over the Newhalen River,
- 3) improve approximately 1.7 miles of roadway/trail from the Newhalen River to the Nondalton material site, and
- 4) rehabilitate the existing approximately 0.6 mile roadway from the material site to Nondalton.

A draft Environmental Assessment (EA) has been prepared for the proposed project describing the alternatives considered and the probable economic, social and environmental effects of the proposed project. Interested individuals are encouraged to attend one of the following public hearings. The hearings will be held in the Open House format and participants may attend at any time during the scheduled hours. Short presentations will be given at the times noted.

<p>Iliamna Community Center February 28, 2000 3:00-6:00 p.m. 4:00 p.m. presentation</p>	<p>Nondalton Community Building February 29, 2000 3:00-6:00 p.m. 4:00 p.m. presentation</p>
--	--

ADOT&PF Building, 4111 Aviation Drive, Anchorage
March 1, 2000
4:00-7:00 p.m.
6:00 p.m. presentation

If you would like a copy of the EA or require additional information, please contact Susan Wick, Environmental Team Leader at 269-0530 or at Susan_Wick@dot.state.ak.us. Written comments will be accepted at the address below until 4:00 p.m. March 13, 2000.


Jerry O. Ruehle
Environmental Coordinator
Preliminary Design and Environmental
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, AK 99519-6900

Persons with a hearing impairment can contact ADOT&PF at our Telephone Device for the Deaf (TDD) number 269-0473. We are able to offer, upon request, reasonable accommodations for special needs related to other disabilities.

less than \$1 million a year to operate, but operators would face melting ice some years, and the road would continually deteriorate. Highway links generated the most public comment, and Ottesen noted everyone that the long-awaited bridge between Dillingham and Chignik was still in the books, and would go forward if the money is there. Other roadway links discussed were roads between Manokotak and Chignik, Lake Iliamna and Dillingham, Lake Iliamna and Dillingham, and Lake Iliamna and Dillingham to Salmon and Port Heiden to Chignik. Topics raised during the public comment period ranged from Elia Elkok's concern about the monopoly the airlines have in the region, to Jackson McCormick asking about a crosswind runway for Dillingham Airport. Ottesen said it was bottom of the list, below rehabilitating the current runway and building a taxi runway. It was also pointed out that no one from Bristol Bay was on the planning team or advisory committee. Alice Ruby said she never received an invitation, even though her name was on the list. City manager Chris Hladick noted what Dillingham had to do was to get its concerns and requests taken into consideration. Ottesen commended that residents write a letter. In an interview later, Hladick said Dillingham wanted a road to Chignik, and that if Manokotak wanted to be connected to Dillingham, Dillingham would support Manokotak's request. "Many of the projects discussed are pie in the sky," Hladick said. "It's very unlikely they'll get built, due to environmental sensitivity." Ottesen and his team traveled to Chignik, New Stuyahok and Manokotak Jan. 18 to hear comments, and are due back in Dillingham April 6 for an advisory committee meeting.

**STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN & ENVIRONMENTAL**

TELEPHONE RECORD

DATE	March 13, 2000
TIME	7:55 am
FROM	Matt Eagleton
POSITION	Biologist
REPRESENTING	NMFS
LOCATION	Anchorage
TELEPHONE	271-6354
TO	Susan Wick 
TITLE	Environmental Team Leader
PROJECT	Iliamna-Nondalton Road Improvements
PROJECT NO.	STP-0214(3)/51951
REGARDING	EA Comments

Matt called to tell me he had reviewed the projects EA and it's EFH, and has no comments. The information is adequate for a non-objection to EFH given the fisheries timing window.

cc: John Dickenson, P.E. Project Manager, Design
Matt Eagleton, Biologist, NMFS

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

Habitat and Restoration Division

TONY KNOWLES, GOVERNOR

333 Raspberry Road
Anchorage, AK 99518-1599
PHONE: (907) 267-2285
FAX: (907) 267-2464

RECEIVED

APR 19 '00

MEMORANDUM

TO: Ms. Maureen McCrea
Senior Project Review Coordinator
Division of Governmental Coordination
Office of Management and Budget
C. Wayne Dolezal

FROM: C. Wayne Dolezal
Habitat Biologist
Region II

DATE: April 17, 2000

SUBJECT: ADOT&PF Project N^o STP-0214(3)/51951 - Iliamna-Nondalton Road Improvements
Newhalen River 4, COE N^o 2-830477, SID AK0002-12AA, ADL 227751

Prelim. Design & Environmental Section	COM	ACTION
PD&E Engr.		
Project Mgr.	/	JD
Env. Coord.	/	gfe
Env. Team Leader	/	SW
Staff	/	Carol
Hydrologist		
Project File		
Central File		

The Alaska Department of Fish and Game has reviewed the U.S. Army Corps of Engineer's public notice, the Alaska Department of Transportation and Public Facilities' (ADOT&PF) prepared Environmental Assessment (EA), and the ADOT&PF supplied copies of public comments for subject project. We understand that the project entails upgrading a portion of the existing road on the east side of the Newhalen River and constructing a new road along the alignment of the existing trail on the west side of the Newhalen River between Iliamna and Nondalton, Alaska. Included in the project plan is construction of a pile-supported bridge across the Newhalen River. The bridge site is found in the SE¹/₄ SE¹/₄ Section 1, Township 3 South, Range 33 West, Seward Meridian. The preferred alternative identified in the EA includes (1) resurfacing, restoring, and rehabilitating the existing 14.4 mile long road between the Iliamna airport and the Newhalen River, (2) constructing a 653 foot-long, 18.6 foot-wide, one lane, six span steel girder bridge over the Newhalen River, (3) building a new 1.7 mile long, 22 foot-wide, two lane, gravel surfaced road between the bridge and the existing Nondalton Road, and (4) resurfacing, restoring, and rehabilitating the existing road between Nondalton and the materials site located south of the village. The project plans are largely conceptual designs with actual final design plans yet to be developed.

Existing road upgrade work between Iliamna and Alexcy Creek is to include resurfacing, restoring and rehabilitating the roadway. Drainage problems including embankment erosion at low spots

around culverts and at soft spots would be corrected. As needed, existing culverts would be repaired or replaced. The road embankments at the Bear Creek, Lovers Creek, South Fork Alexcy Creek and Alexcy Creek crossings would be stabilized to prevent continued sedimentation of these streams. At the South Fork Alexcy Creek, creating a series of step pools, using rock weirs, downstream of the culvert outlet would repair the outlet of the perched culvert. Conceptual plans for the step pools are included in the review materials; however, final design has not been completed. Between Alexcy Creek and the materials site south of Nondalton, road improvements are to include reconstruction or installation of the roadway base and road surfacing, as well as installation, extension or replacement of culverts at several stream crossings. Culverted crossings of fish bearing waters are identified at road stations 55+720, 56+709, and 56+780. Between Nondalton and the materials site south of the village, the existing road would be resurfaced and rehabilitated with two culverts to be replaced, one at station 57+360 and the other at 57+518.

The bridge superstructure would consist of four steel stringers supporting precast concrete deck panels. Five piers spaced about 118 feet apart would support the steel girders. Each pier consists of three 30-inch diameter steel pipe piles. Four of the piers would be located below the ordinary high water level of the river. Due to elevation differences between the east and west banks of the river, about 33 feet of the east bank would be excavated to lower the east end of the bridge thereby reducing the slope of the bridge's running surface. The bridge will slope at about 2.3 percent to the west. Plans included for review show that a 40-inch thick blanket of riprap would be placed below the ordinary high water level of the Newhalen River under the east end of the bridge. The estimated 136 cubic yards of riprap would be installed beneath the existing streambank and riverbed surface profiles so that the top of the riprap will not protrude above streambank or streambed contours. Detailed plans for the riprap work including how the site will be dewatered during riprap installation are not provided.

The Newhalen River has been specified as being important for the spawning, rearing, or migration of anadromous fish pursuant to AS 16.05.870(a). In the vicinity of the bridge, the system supports sockeye salmon, arctic char, and several resident species of fish. In addition, Alexcy Creek and Bear Creek have been specified as being important for the spawning, rearing, or migration of anadromous fish pursuant to AS 16.05.870(a). Both systems provide sockeye salmon spawning habitat and arctic char habitat. Resident species of fish such as grayling and rainbow trout are also found in several other streams crossed by the road. These streams include Lovers Creek, South Fork Alexcy Creek, and streams at stations 55+720, 56+709, 56+780, 57+360, and 57+518.

The following comments are divided into NEPA general and editorial comments and Coastal Consistency Review comments and recommendations.

NEPA Comments

With a few exceptions the EA adequately addresses fish and wildlife related concerns. Conditions and recommendations to address remaining concerns are included in the Coastal Consistency Review portion of this correspondence.

Page 3, paragraph 1 - Will the Iliamna-Newhalen-Nondalton Electric Cooperative be involved in the relocation of the transmission line? ①

Page 8, paragraph 1 - The road between Nondalton and the existing material site south of the village is identified as being 1.4 miles long. The same road segment is identified as being 0.6 mile long at page 10, paragraph 1. Which figure is to be used for cost estimates for road upgrades? ②

Page 11, paragraph 3 - The description of the preferred alternative identifies three options for access to the Newhalen River via the state highway right-of-way. The ADF&G is currently working with the City of Nondalton on plans to create a public boat launch facility on Sixmile Lake in Nondalton. If the negotiations are successful and the boat launch is constructed, the need for a boat launch at the bridge as depicted in option 3 of the EA would be negated. However, experience throughout the state shows that people use road rights-of-way at bridges as access points to rivers and streams. Continued concentrated foot traffic at such sites causes riverbank and vegetative damage that leads to soil erosion and water quality problems from the resulting sedimentation. In addition, vehicles driving on the road embankments to park clear of traffic lanes also creates an increased potential for erosion. There is no reason to believe that the same thing will not occur at the Newhalen River bridge. For this reason we recommend that project designs on the west side of the bridge include some kind of developed, controlled vehicle parking area and an access trail that will both allow people to get to the river and also prevent long term erosion and water quality problems. Option 2 provides a viable means of accomplishing these goals. We will work closely with you during the design phase of the project to assist in development of an environmentally friendly approach to address the situation. ③

Page 11, last paragraph - Bridge construction and road improvements costs are identified as 4.7 million dollars (1998 dollars). At page 36, paragraph 2 the cost is given as approximately five million dollars (in 1997 dollars). Which is the more accurate figure? ④

Page 22, paragraph 4 - There is a citation to "ADF&G October 8, 1999", however, the reference is not listed in the bibliography. If the document referenced is the same as the one included at page A-106 of the EA, we note that the conclusive statements found on page 22 are not included in the October 8, 1999 memorandum; therefore it should not be cited. In addition, most of the references contained in the bibliography on pages 55 and 56 are not cited in the text of the EA. ⑤

Coastal Consistency Review

Comments

Additional details are required for several elements of the project requiring authorization from the ADF&G. These include more detailed plans for the rock weirs that will be used to create step pools leading to the outlet of the South Fork Alexcy Creek culvert. We will work with ADOT&PF during the final design phase to develop an acceptable set of plans that will provide for fish passage. ⑥

The size of the proposed 3-foot diameter culvert at station 55+720 must be reevaluated. The stream channel at the road crossing is vertically incised with under cut banks. The channel is 4 feet wide

and 2 feet deep at bank full flows. It lies within an active flood plain that ranges in width from 8 to 12 feet. Blockages to fish movement and long term problems with streambed erosion at the pipe outlet can be anticipated if a properly sized, larger diameter culvert is not installed at this location.

The existing culverts at stations 57+360 and 57+518 are undersized. A tremendous amount of bedload material has been deposited upslope of the road and the outlets have become perched. The proposed 48-inch diameter culverts should rectify the problem, however, because of the upslope sediment deposits it may not be possible to install the new culverts at a slope that will allow fish to pass. Energy dissipaters in the form of baffles or other devices may have to be included in the final designs in order to provide for fish passage.

The project plans call for installing riprap below the ordinary high water level of the Newhalen River. However, no description is provided explaining how this will be accomplished while preventing sedimentation of the flowing water. Likewise, detailed plans for control and treatment of sediment-laden water produced during pile driving operations must be developed during the final design phase of the project.

Recommendations

Upon receipt of final design plans responding to the above listed coastal consistency comments, the ADF&G will issue the necessary Fish Habitat Permits for the culvert installations at stations 55+720, 56+709, 56+780, 57+360, and 57+518, the rock weirs at the South Fork Alexcy Creek, and the Newhalen River bridge piles and east bank riprap. The following stipulations will be carried on the Fish Habitat Permits pursuant to AS 16.05. 840:

For the culverted stream crossings:

1. The culvert, including any inlet and outlet headwalls or end sections, shall be installed so that the invert of the culvert is buried at least 20 percent of the diameter of the pipe or 18 inches, whichever is less, at both the inlet and outlet of the culvert, below the streambed elevation at the site.
2. For the type of round corrugated metal pipe culverts proposed by the applicant, maximum allowable culvert slope that provides for reasonable fish passage is dependent upon culvert length. Therefore, the effective slope of an unmodified culvert longer than 80 feet at any point along its length must not exceed 0.5 percent. If the slope of any culvert must be set at greater than 0.5 percent, some method must be incorporated in the design to allow fish passage. The use of baffles or other types of energy dissipaters inside the culvert barrel must then be considered.
3. The culvert shall be designed, installed, and maintained so that water velocity, flow, and any resulting drops in the water surface profile at any point within the culvert influence shall not impede the efficient passage of the slowest swimming fish group that occurs at the location of the proposed culvert installation.

4. The culvert shall be installed on a firm substrate. If necessary to obtain a solid foundation, peat or other unsuitable material shall be excavated to a solid substrate and the area backfilled with clean gravel prior to placement of the culverts.
5. Each bank cut, slope, fill, and exposed earth work attributable to culvert installation and road building activities must be stabilized to prevent erosion both during and after project construction.

For the rock weirs:

6. The section of stream where rock weirs are installed shall be dewatered during excavation and rock installation operations. Water shall bypass the work area and be supplied to the stream reach immediately downstream of the work area in a constant flow and in sufficient quantity to support the fish living in the stream.
7. Immediately upon dewatering the work area, any fish that are stranded shall be collected and returned unharmed to the stream reach containing a continuous supply of water.
8. The rock weirs shall be constructed of stones large enough to withstand a 100-year flood event and not be washed away.

The following stipulations will be carried on the Fish Habitat Permits pursuant to AS 16.05. 870:

For the Newhalen River bridge:

9. All inwater work shall occur only during the period May 15 through July 15.
10. Equipment servicing and refueling shall not be conducted below the ordinary high water level of the Newhalen River. Equipment leaking fuel, oil, hydraulic fluid or other pollutants shall not be operated below the ordinary high water level or moved on the shoreline or bed of the Newhalen River. Petroleum product spills shall be cleaned up immediately and contaminated earth, debris, or other materials shall be disposed of as required by Alaska Department of Environmental Conservation regulations.
11. Installation of the riprap on the east bank must be completed either when the site is naturally dewatered or when measures must be taken to isolate and dewater the site from the flowing water of the river.
12. The slurry and sediment laden water removed from each pile prior to filling with concrete must be collected and disposed in an approved area. Slurry and sediment laden water shall not be discharged into the Newhalen River.
13. The ADF&G, Habitat and Restoration Division shall be notified at 267-2333 at least 72 hours before commencement of pile driving and riprap installation operations.

The ADF&G finds the project to be consistent with the standards of the Alaska Coastal Management Program (ACMP) and the Lake and Peninsula Borough Coastal Management Program (L&PBCMP) if the following conditions are incorporated in project approvals:

14. To minimize petroleum products spills into the Newhalen River, cleanup materials such as sorbent pads or booms shall be available on site to contain and cleanup any petroleum product spilled as a result of pile driving or riprap installation operations.

Rationale: This stipulation is necessary to protect against damage to important fish and wildlife habitat that could be caused by the accidental discharge of a toxic or hazardous material. (Pursuant to L&PBCMP Policy C-4 and 6 AAC 80.130).

15. The ability of all persons to use or access state land or public water shall not be restricted in any way.

Rationale: The Newhalen River provides an important subsistence and sport fishery. (Pursuant to L&PBCMP Policy E-2).

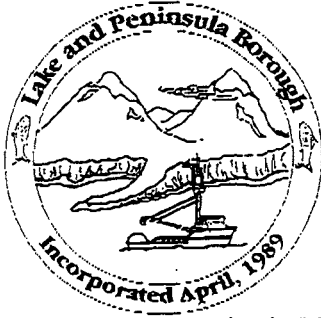
The above conditions are necessary according to the rationale and the parenthetically referenced policies of the ACMP and the L&PBCMP. These conditions serve to protect water quality, important fish and wildlife habitat, and human uses of these resources.

We appreciate the opportunity to comment. If you have any questions please contact me at 267-2333.

cc: S. Wick, ADOT&PF
R. Stefanich, ADOT&PF
C. Sanner, ADOT&PF
W. Wrede, L&PB
V. Ross, COE
S. Morstad, ADF&G
K. Weiland, ADF&G
D. Dunaway, ADF&G
D. Sellers, ADF&G
K. Gaskill, DNR/DMLW
T. Rumpfelt, DEC
G. Wheeler, USFWS/WAES
M. Eagleton, NMFS

DOT Responses:

1. A sentence has been added to the revised EA stating that the appropriate utility companies will be coordinated with during the design and utility phases of this project.
2. No correction to the EA is necessary. Your comment was for two different road segments. The distance between the existing material site and the airport is 1.4 miles and the distance between the material site and Nondalton is 0.6 miles. This project proposes only to rehabilitate the roadway from the material site to Nondalton.
3. To ensure the riverbank is not damaged, we have retained the boat launch as a backup measure in the event you and the City of Nondalton can not provide an alternative site on Sixmile Lake within the city. If a boat launch is developed prior to the construction of this project, ADOT&PF will construct only Option #2 - a controlled vehicle parking area and access trail.
4. Page 11 of the revised EA reflects our change to "approximately 5.0 million" to correspond with the number used on page 36 of the EA.
5. The citation on page 22 of the EA has been deleted.
6. Additional detailed plans were provided to you on November 17, 2000

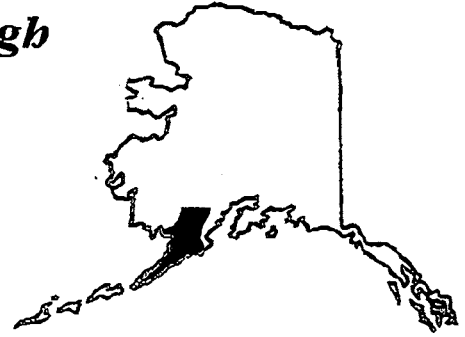


March 10, 2000

Lake and Peninsula Borough

P.O. Box 495
King Salmon, Alaska 99613

Telephone: (907) 246-3421
Fax: (907) 246-6602



Mr. Jerry O. Ruehle
Environmental Coordinator
Department of Transportation and
Public Facilities
4111 Aviation Ave.
P.O. Box 196900
Anchorage, AK. 99519-6900

SUBJECT: Borough Comments / EA / Iliamna-Nondalton Road

Dear Mr. Ruehle:

This letter contains the comments of the Lake and Peninsula Borough regarding the Environmental Assessment for the Iliamna-Nondalton Road. The Iliamna-Nondalton Road has been the Borough's top transportation and C.I.P. Priority for the past eight years. The Borough continues to strongly and enthusiastically support this project and sincerely appreciates the opportunity to provide comments on this Environmental Assessment.

In general, the Borough believes that the Alaska Department of Transportation has done an excellent job of describing the nature and scope of the project. It has also taken great pains to identify and examine the potential environmental, economic, and social impacts associated with all of the viable alternatives. The Borough appreciates the fact that DOT/PF studied this project in a comprehensive manner and that it consulted frequently with the Borough, affected cities and tribes, and all of the appropriate resource and permitting agencies.

The Borough has reviewed the EA, the comments by resource agencies, and the comments received to date by the public. Borough staff also attended all three public meetings and witnessed the overwhelming display of public support that was once again displayed for this project. The Borough has concluded that there are no significant environmental or social impacts associated with the project that cannot be adequately addressed or mitigated. In fact, we have concluded that the environmental and social impacts associated with completing this project are compelling and that they far out-

weigh the potential negative impacts. The "do nothing option" is unacceptable from an environmental and community development perspective.

Therefore, the Borough has concluded that an Environmental Impact Statement (EIS) is not necessary or appropriate. The EA has not identified any significant potential environmental, social, or economic impacts that merit further study. The Borough strongly urges the Federal Highway Administration to review the facts and issue a "Finding of No Significant Impact" (FONSI) as quickly as possible.

The Borough would like to provide the following specific comments that in our view would strengthen and improve the EA.

Purpose and Need Statement

Public Safety:

- (A.) The paragraph on public safety should note that even though Nondalton has a relatively new runway, medivacs by air are frequently impossible due to weather and runway conditions. An ambulance with ground service to Iliamna would be a great improvement.
- (B.) It should be noted that a surface transportation link would make it much easier for medical and emergency personnel to reach Nondalton. This includes the State Troopers, VPSOs, fire fighters, EMTs, doctors, utility personnel, etc.
- (C.) The EA notes that lives have been lost due to unsafe ice. Local residents report that the number of vehicles that have been lost by falling through the ice has been under-reported. A new 1999 Ford pickup fell through the ice just this year.

Health Care: We have the same comments as the paragraph above with respect to medivacs and emergency medical personnel. In addition, it should be emphasized that health care services could be greatly expanded and greater efficiencies could be realized in the delivery of these services. In short, local residents could receive better health care services at a reduced price. The EA notes that local residents have identified a need for a sub-regional clinic or hospital facility. It is the Borough's understanding that the Nilavena Tribal Consortium (a consortium of tribal governments in the Lake Clark-Lake Iliamna region) has already hired a consultant to examine the feasibility of establishing a mid-level regional clinic. This type of facility would obviously be more viable if the road were completed.

Economy:

The Borough believes that the EA significantly understates the potential economic benefits associated with the project. This section should be expanded.

- (A.) The EA does not do an adequate job of describing existing economic conditions. This is important because it helps clarify and justify the compelling need for this project. Nondalton and Newhalen in particular are economically depressed communities. The percentage of people living below the Federal poverty line and the

low and moderate income standard established by HUD is staggering. These statistics far exceed state and national averages. The unemployment rate is close to 50 percent and that figure does not reflect the number of people who have simply given up looking for work. Very few private sector jobs (or jobs of any kind) exist in these communities.

- (B.) The EA notes that completing the road would effectively double the customer base for local business. This would make more local businesses viable. While this change in economy of scale could indeed mean more local jobs, it could also mean a reduction in retail prices and an increase in the number and variety of available products.
- (C.) The EA should emphasize that the road would make it much easier for Nondalton residents to commute to jobs in Iliamna and to travel to other employment opportunities in Bristol Bay, Anchorage, and elsewhere.
- (D.) The EA should note that the road will help Nondalton residents expand and diversify their own economy. For example, little or no mention is made of the potential for cultural, recreational, and non-consumptive tourism. Nondalton, Iliamna, and Newhalen have very rich cultural histories and traditions. They also can serve as gateway communities to Lake Iliamna and Lake Clark National Park. Tourism development has been identified by local residents as a desirable and feasible way to diversify the local economy.
- (E.) The Nondalton runway cannot be expanded due to physical constraints. This runway needs to be 2,000 feet longer to accommodate cargo planes. As a result, there are severe size, weight, and bulk limitations on freight that can be airlifted to Nondalton. For example, even normal sized sheets of plywood must be cut in half before they can be transported to Nondalton. In short, the road will drastically reduce the cost of freight and hence; the cost of living.

Delivery of Governmental Services:

We believe this section should be expanded. Providing for improved and more efficient government services is one of the most important benefits associated with the project. The communities of Iliamna, Newhalen, and Nondalton will be able to take a serious look at sharing and combining some facilities and services. This could include police, fire, public works, bulk fuel storage, landfills, emergency medical, etc. Other service providers would be able to provide their services more efficiently as well. This includes the State, Borough, School District, Bristol Bay Housing Authority, Bristol Bay Native Association, and the Alaska Native Tribal Health Consortium. In addition, local residents have identified a need to bring University of Alaska Rural Campus course offerings to the area.

Environmental Issues:

The EA illustrates that the environmental impacts associated with the project are overwhelmingly positive. There are several environmental benefits that were omitted however.

(A.) Fuel handling will be improved and the potential for spills will be reduced. Local residents will no longer have to transport fuel barrels in skiffs along the Newhalen River and Six Mile Lake. Fuel will not have to be driven across unstable ice. Planes loaded with fuel will not have to attempt landing on a marginal airstrip. Consolidation of bulk fuel storage facilities and quicker responses to spills would be possible.

(B.) The EA notes that the number of sport fishers and hunters is increasing steadily every year. This is a direct result of the close proximity of airstrips in Iliamna, Nondalton, and Keyes Point. Local residents have noticed increased incidents of trespass, litter, and damaged stream banks and spawning habitat. The road would help land managers monitor these activities. This would include managers for local Native Corporations, DNR, ADF&G, the National Park Service, etc.

Road Classification:

The section of road from Alexcy Creek to Fish Camp has received maintenance on a more regular basis than is indicated in the EA. Some maintenance activities have been performed by the Iliamna-Newhalen-Nondalton Electric Cooperative. In addition, both Nondalton and Iliamna have received State Revenue Sharing monies to maintain portions of the road over the years. That is a primary reason the City of Nondalton has driven its heavy equipment across the Newhalen River.

Environmental Consequences:

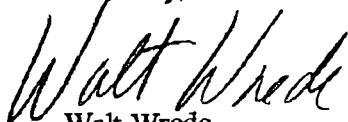
The Borough deeply appreciates the thorough discussion regarding environmental justice provided in the EA. We strongly agree that the build option will result in significant social, cultural, and economic benefits to the resident population. The Borough has concluded that the "no-build" option is the one which would cause "disproportionately high and adverse impacts on minority and low income populations with respect to human health and the environment." The people of Nondalton and the region at-large want to participate in the American dream. They have the right to expect access to good jobs, good health care, good public facilities, and a good quality of life. Most of this is taken for granted in the rest of America.

Finally, the Borough would like to state that it supports "Option A" in the section which describes options for the bridge approaches areas. The Borough agrees with the City of Nondalton that the area adjacent to the bridge approach on the west side should be closed off to public access. There should be no boat ramp at that location. There are better locations for public access which include land the City has identified within the City boundaries. The City is presently working with the Alaska Department of Fish and Game to make this access a reality.

2

The Borough appreciates the opportunity to comment. Please do not hesitate to contact us if you have any questions or need additional information. We anxiously await your final report and the decision of the Federal Highway Administration. Thanks for your time and consideration.

Sincerely,



Walt Wrede
Borough Manager

c.

Governor Tony Knowles
Representative Carl Moses
Senator Lyman Hoffman

DOT Responses:

1. Please see DOT&PF responses to Jeff Parker on pages D-149 thru D-151. Since this project is following the "Interagency Working Agreement to Integrate Section 404 and Related Permit Requirements into the National Environmental Policy Act" the purpose and need section of the EA was reviewed by FHWA and all participating agencies prior to it's distribution. Your comments add to the strength of the section, however, we have decided not to change the EA's Purpose and Need section.
2. After numerous communications with the public, ADF&G and other resource agencies, we have decided not to build a boat launch adjacent to the proposed bridge location if the City of Nondalton and ADF&G can provide an alternative site on Sixmile Lake within the City boundaries. If that boat launch is developed prior to the construction of this project, to ensure the riverbank is not damaged and to maintain water quality in the Newhalen River ADOT&PF will construct only Option #2 - a controlled vehicle parking area and access trail. If the City does not provide a public boat launch ADOT&PF has a permit to construct Option #3. Whichever option is constructed, Private Property No Trespassing signs or similar signs will be installed at the edge of our right-of-way to discourage trespass on to adjacent private property.

RECEIVED

MAR 14 '00

Iliamna Village Council
P.O. Box 286
Iliamna, Alaska 99606
(907) 571-1246
(907) 571-1256 Fax#

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr. JD		/
Env. Coord. JR	1	
Env. Team Leader SW		/
Staff		
Hydrologist		
Project File		2
Central File		/

March 10, 2000

Jerry O. Ruehle
4111 Aviation Avenue
P.O. Box 196900
Anchorage, Alaska 99519-6900

Re: Iliamna-Newhalen Road Improvements
Project No. 51951

Dear Mr. Ruehle:

I am writing this letter in regards to the Iliamna-Newhalen Road Improvements Project No. 51951.

There have been three public hearings that the community members of Iliamna-Newhalen-Nondalton attended each time in support of this road project. The Iliamna Village Council is in full support of the road that would benefit the communities with health services, mail service, fuel, food, transportation, and improve the economy for all the communities.

The Village Council of Iliamna would like the State of Alaska to work closely with the communities in getting the road contract and hiring local people for the road project. If you have any questions please feel free to contact me at anytime. Thank you for your time and consideration.

Sincerely,
Lorene A. Anelon
Lorene A. Anelon, Vice President

CITY OF NONDALTON/OFFICE OF THE MAYOR

P.O. Box 089 Nondalton, Alaska 99640

Ph.#(907) 294-2235 fax (907) 294-2239

RECEIVED

March 10, 2000

MAR 14 '00

Jerry O. Ruehle, Environmental Coordinator
 Alaska Department of Transportation & Public Facilities
 Design and Engineering Services
 P.O. Box 196900
 Anchorage, Alaska 99519-6900

Re: Iliamna-Nondalton Road and Bridge Project No. STP-0214(3)/51951
 Environmental Assessment Review and Comments

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr. J.D.		
Env. Coord. J.R.	1	
Env. Team Leader S.D.		
Staff		
Hydrologist		
Project File		2
Central File		

Dear Mr. Ruehle;

It gives the Community of Nondalton great pleasure to submit to you what we hope to be the final (of very many) comments regarding the Iliamna-Nondalton Road and Bridge Project No. STP-0214(3)/51951. Community members attended both the Nondalton Public Hearing held on February 29, 2000 in Nondalton and many community members traveled to Anchorage to attend the Public Hearing held in Anchorage on March 1, 2000.

As one can only gather from the comments received both verbal and in writing. The people most affected by this project demand that it is time for this project to move forward and allow them the opportunity to enhance the quality of their life's that most people just take for granted in our great country. It is apparent that there are a few individuals that have expressed a willingness to prevent the enhancement of our quality of life from happening at whatever the cost. In fact, so that they may in deed expand their American Dream's regardless of the ending result to the people and the environment this project will benefit. As the great Colonel Sherman Potter once said "BULL PUCKY"

After reviewing the Environmental Assessment (EA), and comments from both the resource agencies and the general public. The Nondalton City Council (the council), by unanimous vote and approximately 95% of the total registered voters in Nondalton, endorse and demand the final completion of the Iliamna-Nondalton Road Improvements, Project No. STP-0214(3)/51951.

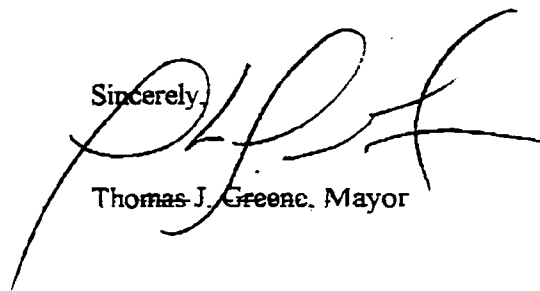
The council further finds that an Environmental Impact Statement (EIS) is not necessary or appropriate. We believe the EA has shown that there are no significant social or environmental impacts associated with this project that can not be properly addressed. In fact we believe that the "do nothing" approach is unacceptable given the information provided by both EA and the Secondary and Cumulative Impacts Study (SCIS). The EA has not identified any significant potential environmental impacts that would suggest any further study.

1

However, the council, other agencies and public members have questions to the added project description. The project as it is now includes a boat launch to be constructed at the bridge site on the Nondalton side of the river. The council clearly opposes this boat launch and in fact recommends that guardrails be installed to prevent boat launching and any other activity to occur in this area. There are several reasons why! First of all, this location is not the best for such an activity. We can ensure you that no one from Nondalton will utilize this facility because it is so far out of town. Who in their right mind is going to drive out of town a couple of miles when they can put their boat in the water and park it there only a few hundred feet away from their homes. Surely no one from Iliamna or Newhalen is going to drive the extra 8 miles out of town to put their boats in the water when there is a great spot to do so back down river at what is known as the landing site. (see figure 1 of the EA). Secondly, the site in which this boat launch has been selected is very swift and has strong under-toe currents. There are many shallow sandbars that have anywhere from a five foot to a sixty foot drop. Due to the under currents, the swiftness of the river and the unpredictable river bottom, this area is not safe for any activity. Finally, the City of Nondalton is currently discussing an MOU with the Alaska Department of Fish & Game to designate a parcel of land in the community were better access can create a better boat launch. The City believes that both the public and government agencies will be better served with the boat launch and dock facility located in the Community.

Again! Thank you for the opportunity to comment on the above mentioned project and if there are any questions my office can answer. Please do not hesitate to call.

Sincerely,



Thomas J. Greene, Mayor

DOT Response:

1. Please see response number 2 on page D-20.

ILIAMNA-NONDALTON ROAD IMPROVEMENTS

PROJECT NO. 51951

PUBLIC HEARING

February 28, 2000

3:00 - 6:00 pm

Iliamna Community Center

SIGN-IN SHEET - PLEASE PRINT

D-24

	Name	Mailing Address	Phone Number
1.	Lem Batchelder	PO Box 157 Iliamna AK	571 1276
2.	Jerry Clay	P.O. Box 172 Newhalen AK	571 1662
3.	MANUEL ANELON	Box 4 Grammas' Rd Newhalen AK	571-1375
4.	Dennis Niedermeyer	Box 498, King Salmon, AK	246-4280
5.	Harvey Anelon	Box 305, Iliamna AK	571-1295
6.	Maria Anelon	Box 305, Iliamna AK	571-1295
7.	Freda Slye	Box 205 Ili AK 99606	571-1203
8.	Andrew Ballata	Box 21 Ili AK 99606	571-1254
9.	Marian Robyn Macillie	Box 41 Iliamna, AK. 99606	571-1695
10.	James R. Lapoint Sr.	P.O. Box 52 Iliamna AK 99606	571-1200
11.	Steve Macillie	Box 41 Iliamna AK 99606	571-1695
12.	Louise Anelon	Box 167 Iliamna AK 99606	571-1323
13.	Fay J. Hill	Box 247 Iliamna AK 99607	571-1268

SIGN-IN SHEET Continued

	Name	Mailing Address	Phone Number
14.	Lorene G. Anita	PO Box Iliamna AK 99606	571-1554
15.	Trefin Andrew	PO Box 12 Iliamna AK 99606	571-1648
16.	Myrtle Anita	P.O. Box 248 Iliamna AK	571-1232
17.	Chip Embretson	P.O. Box 7 Iliamna AK	571-1225
18.	Marvin R. Smith	P.O. Box 495, King Salmon, AK 99613	907-246-3421
19.	Wassie W. Balluta	P.O. Box 170 Ili. AK 99606	907-571-1700
20.	Fedora Balluta	P.O. Box 170 Ili. AK. 99606	907-571-1700
21.	Sophie Anelon	Box 002 Ili. A 99606	907 571-1507
22.	Joel Newton	Box 87 Iliamna, AK 99606	907 571-1631
23.	Mara L Armstrong	PO Box 9 Iliamna AK 99606	571-1225
24.	Greg Anelon, Jr	Box 246 Newhalen, AK 99606	571-1568
25.			
26.			
27.			
28.			
29.			
30.			
31.			
32.			
33.			

ILIAMNA-NONDALTON ROAD IMPROVEMENTS

PROJECT NO. 51951

PUBLIC HEARING

February 29, 2000

3:00 - 6:00 pm

Nondalton Community Building

SIGN-IN SHEET - PLEASE PRINT

	Name	Mailing Address	Phone Number
1.	Gary Marttila	P.O. Box 24 Nondalton, AK 99640	294-2200
2.	Harry Karshukoff	P.O. Box 35 NONDALTON AK 99640	294-2220
3.	George Alexie	Box 108 " " "	294 2269
4.	June Trancy	PO Box 76 Nondalton AK	294-2228
5.	Eva Kellep	10 Box 062 Nondalton	294-2237
6.	Claudia June	P.O. Box 054 " "	294-2254
7.	Tom Greene	" " " "	" " " "
8.	Soremiak L. Hobson	" " " "	" " " "
9.	EARL A. BALLUTA	P.O. Box 085 NONDALTON AK 99640	294-2221
10.	Elyse Balluta	P.O. Box 108 Nondalton, AK. 99640	294-2269
11.	Elyse Balluta	PO Box 51 Nondalton AK, 99640	294-2309
12.	Eva C. Arfors		294-2242
13.	George H. Hottelash Sr.	PO Box 022 nondalton AK 99640	294-2218

D-26

SIGN-IN SHEET Continued

	Name	Mailing Address	Phone Number
14.	Sydney Ballata	Gen. Del. NONDALTON AK. 99640	294-2309
15.	Bob Tracey	NONDALTON AK. 99640	294-222F
16.	William W. Trefon Sr.	P.O. Box 46, Nondalton, AK. 99640	294-2203
17.	Martin R. Smith	^{LT 7800095} PO Box 455, King Salmon, AK 99613	907-286-3821
18.	Lydia Wilson	P.O. Box 5; Nondalton 99640	294-2205
19.	Edward J. Wilson		
20.	Dennis Trefon	Box 112 Nondalton AK	294-2302
21.	Brenda Trefon	PO box 73, Nondalton, AK 99640	294-2211
22.	Melita Ballata	P.O. Box 24 " " "	294-2200
23.	PETE TREFON	P.O. Box 73 Nondalton AK	907-294-2211
24.	Billy Trefon	P.O. Box 057 Nondalton AK 99640	(907) 294-2282
25.	Ruth A Trefon	007 Nondalton, AK (99640)	294-2282
26.	Nancy DeKittie	P.O. Box 008 Nondalton, AK 99640	294-2209
27.			
28.			
29.			
30.			
31.			
32.			
33.			

ILIAMNA-NONDALTON ROAD IMPROVEMENTS

PROJECT NO. 51951

PUBLIC HEARING

March 1, 2000

4:00 - 7:00 pm

ADOT&PF Building, 4111 Aviation Drive, Anchorage

SIGN-IN SHEET - PLEASE PRINT

	Name	Mailing Address	Phone Number
1.	Shearn Johnson	4155 Tudor Centre Dr, Ste 104 99508	561-4487
2.	Benjamin Trefon, jr.	4155 Tudor Centre Dr, ste. 104, 99508	561-4487
3.	WALTER JACKINSKY	4155 Tudor Ctr. Dr. ste #104, 99508	561-4487
4.	Melvin LeVeque	Box 62 Nondalton	294-2237
5.	Eva LeVeque	" "	"
6.	Latricia LeVeque	" "	"
7.	Marvin R. Smith	Po Box 495, King Salmon, AK 99613	907-246-3421
8.	Maureen McCrea	550 W. 7 th Suite 1660 Anch. 99501	269-7473
9.	WALT WRENE	Box 495 KING SALMON 99613	246-3421
10.	JENNIFER WILSON	ADOT&PF	269-0512
11.	JOHN TOLLEY	ADOT&PF	269-0520
12.	William W. Jeffers	P.O. Box 46 Nondalton, AK, 99640	294-2203
13.	Chandine Greer	P. O. Box 56 Nondalton AK 99640	294-2253

D-28

SIGN-IN SHEET Continued

	Name	Mailing Address	Phone Number
14.	Tom Green	P.O. Box 54 Nondalton, AK 99640	294-2259
15.	Lydia Wilson	P.O. Box 5; Nondalton, AK 99640	294-2205
16.	George Alexie	Box 108 " " " "	294-2269
17.	Elizabeth Balluta	Box 104 Nondalton, AK.	294-2269
18.	Anita R. Carthikoff	3680 Forest Rd #B Anch	561-4487
19.	Leon M Balluta	3336 E 16 th Ave Anch	272-4048
20.	Marilyn Balluta	3451 Kay LT Anch	522 7787
21.	Victor Ross	P.O. Box 898 ANCH	753-2724
22.	Janice Balluta	2201 Sentry Dr #2 Anch. AK 99507	52-2-0842
23.	Frances Wilson	PO Box 947, Palmer AK 99615	746 5028
24.	Katherine Anderson	PO Box 222062 Anchorage 99522	563-0013
25.	MICHAEL UEHARA	King Pacific Lodge PO VANCOUVER CANADA 407604 ⁹⁶⁷ 5452	
26.	BEN NORTHLEY	11710 So. Gambell Anch 99515	522 - 9655
27.	Pete Koktelash	Gen. Deli Nondalton, AK. 99640	294-2218
28.	John Delkittie	3336 E. 16 th Ave. Anch., AK. 99508	272-4048
29.	Leon Balluta	3336 E. 16 th Ave. Anch, AK. 99508	272-4048
30.	Jeff Parker	Elgum Associates, 645 G St, #300 Anchorage AK 99501	272-3325
31.			
32.			
33.			

**ILIAMNA-NONDALTON ROAD IMPROVEMENTS
PROJECT NO. 51951**

**PUBLIC HEARINGS TRANSCRIPT
FOR**

FEBRUARY 28, 2000 – ILIAMNA COMMUNITY CENTER

FEBRUARY 29, 2000 – NONDALTON COMMUNITY BUILDING

**MARCH 1, 2000 – ADOT & PF BUILDING, 4111 AVIATION DR.
ANCHORAGE**

FEBRUARY 28,2000 – ILIAMNA COMMUNITY CENTER

Lorene Anelon

“Hi, my name is Lorene Anelon and I supervise the Lake Iliamna Clinics and I wanted to do a public comment period for the health and safety issue for reasons here. With Nondalton there we’ve been helping with emergencies and we have medi-vac that have not been able to get out of Nondalton. We’ve had to take the ambulance up to Nondalton a couple of times. One for gall bladder attack, the other was a heart problem and there’s been other times when we had the nurse practitioner here fly up to Nondalton to assist in some emergencies, and it could have been taken done over the road system instead of flying up there. I’m not sure of the cost, but I know that if we had a road system in place, the ambulance and the health aids would be able to work a little more closely together. Right now we have faxes, phones, but there are times when the weather is really bad and they are unable to fly into Nondalton. And the problem, the reason why Iliamna is used is because the airport is lit. The airplanes are able to fly in; its well maintained by the state and the health aid from Iliamna has assisted in quite a few emergencies for Nondalton. And also Nondalton health aids have helped Iliamna, like if we run out of medicine, we’ve taken medicine from the Nondalton clinic and brought it down here. And so we all work together with the health issues, and my biggest concern here is you know if other people are saying they are not for the road, it just doesn’t help all our people here because all our people right now work together or are inter tied by either blood, emergencies, health, and there’s a lot of people that are always interacting. We are either going to a funeral, a wedding, or whatever is taking place, carnivals and I know that this road would help all of us. I know there’s the pros and cons, but I just see this as a beneficial area for the health. We’re all pushing for a sub-regional clinic here and if we have a sub-regional clinic people from the lake area would be able to come and get their x-rays done, have things done here instead of having to fly to Anchorage and spend \$400.00 round trip to pay for their own airfare to get an x-ray done. Or in the summer time we have a nurse practitioner that comes out and she would be able to help the other villages once they fly here and then a medi-vac does not have to be spend \$6000.00 for a medi-vac because she’d be able to take care of them here in the lake area, and that’s what I had to say.”

Marv Smith

“Good evening, my name is Marv Smith, and I represent the Lake Peninsula Borough. Iliamna-Nondalton Road has been the number one capital improvement project for the borough for about eight years or longer. The borough continuously we support this project very enthusiastically. The support of the project is needed. We appreciate the opportunity to be able to comment here today. And in general the borough believes that the Alaska Department of Transportation's done a real good job on its EA you see in front of you. It’s a good document and the nature and scoop of the project is well described. It’s taken a great pains to identify and examine the potential environmental, economic, social impacts, that could possibly be affected. The borough appreciates the fact that DOT&PF has also studied this project in a comprehensive manner and it’s consulted frequently with the borough. We talked to these guys quite often almost day to day about what’s going on, and we’ve been in contact with them a lot and we’ll continue to be in contact with them. And they also talk to the tribes and the cities and the villages that are involved. And also the requirements for permitting agencies involved. The borough has reviewed the EA, the comments [by] resource agenc[ies] and the comments received [to] date-of the public. There is a lot of public comment in that interview if you read it. Most of them are positive. It was concluded there was no significant environmental social impacts associated with this project and cannot be adequate addressed. In fact we have concluded the environmental social impact associated with the completed project far outweigh the potential negative affects it would have without it. The do nothing option is unacceptable from an environmental and community development prospective. Therefore the borough has concluded that this environmental impact statement you see in front of you, many of you have a copy of it, that an EIS is not necessary or appropriate. The EA has not identified any significant potential environmental affects that might merit a further study. In other words, this study has done a good job. We don’t need to do any further because all its gona do is slow the process down and she said earlier it go into many years if an environmental impact statement is required. We’d like to provide a following possible specific comments that are in view of that might strengthen the EA.

We feel that in the purpose and needs statement it's already been mentioned other public comments that public safety is probably the most paramount that could affect the road. The public safety should now know that even Nondalton has relatively a new runway, but medi-vac by air are frequently impossible due to weather and runway conditions. An ambulance would be able to service Iliamna, would be a great improvement to be able to service Nondalton. It should be also noted that surface transportation link would at that time make it much easier for the medical and emergency personnel to reach Nondalton and this includes state troopers, VPSO, firefighters, EMT's, doctors, utility personnel. At that point if a state trooper has a or a VPSO has a problem in Nondalton, he could call the guy in Iliamna to come and back him up. He has to go in there by himself right now. He's ___ and those guys don't have guns you know and sometimes you can walk into an environment and a situation and _____ non _____ and problems people having domestic violence. I hope it don't occur a lot but it could. And that guy putting his life in danger. We need to be able to back him up. A road would help that.

Health care, we can't speak enough about that. We commented on the paragraph above [with] respect to the medi-vac emergency medical personnel. In addition it should be emphasized that the health and care services should be greatly expanded and great efficiencies could be realized. Like Sue had talked about earlier, a possibility of small regional health clinic here would help support everybody in all three communities. In short, local residents could receive better health care and services at a reduced price. The economy is scaled. The borough believes that the EA significantly understates the potential economic benefits associated with this road. This section should be expanded. The EA does not do much to describe the exist[ing] economic conditions. That is important because it helps clarify the pressing needs for this project. Nondalton, Newhalen in particular, are economic depressed communities. The percentage of people that are living below the federal poverty line and the low and moderate income standard established by HUD is staggering. It far exceeds state and national averages. The unemployment rate is close to fifty percent. That figure does not really reflect the number of people who have just given up and quite looking for work, so it's probably higher. Very few private sector jobs or jobs of any kind at all exist in some of these communities. The EA does not complete the road, does not, the EA notes the completed road would effect double the customer base local businesses. This would, more local business viable, or the change in the economy of skill would indeed mean more local jobs. It could also mean a reduction in retail prices increase and the number of variety of available products in local stores. The EA should emphasize that the road would make it much easier for Nondalton residents to commute to jobs, Iliamna and to travel to village, perform opportunities in Bristol Bay, Anchorage and elsewhere. The EA should also note that the road will help Nondalton residents expand and versify their own economy. For example little or no mention in the EA is mentioned about the potential for cultural or non-consumpted tourism. Nondalton, Iliamna you have a very rich cultural historical traditions. They also could serve as the gateway communities to Lake Iliamna and Lake Clark National Park which the EA to speak about that quite a bit more.

Delivery of governmental services. We believe this section needs to be expanded some to improve, provide, for improved or more efficient government services in one of the most important benefits associated with the project. The communities of Iliamna and Newhalen [and] Nondalton will be able to take a serious look at sharing and combining some facilities and services: as was talked about earlier. Possibility of maybe maintaining that road if we have to. This could also include police, fire, public works, bulk fuel storage, land fills, emergency medical, etc. Other service providers to be able to provide their services more efficiently as well. This includes the state, the borough, Bristol Bay Housing Authority, Bristol Bay Native Association, Bristol Bay Health Corporation, etc. All those agencies would certainly be of benefit about a road.

Environmental issues: The EA does a good job of showing that the environment impacts associated with the project are overwhelming positive. There are several environmental benefits that are omitted however. Fuel handling will be improved and the potential for spills will be reduced. Local residents will

no longer have to transport fuel barrels in skiffs along the Newhalen River or Six-Mile Lake. Fuel will not have to be driven across unstable ice. Planes loaded with fuel will not have to attempt landing on a marginal airstrip, which is located in Nondalton. Consolidation of fuel bulk storage facilities and quick response to spills will be possible. The EA also needs to note that the number of sports fisherman and hunters is increasing steadily in the area every year. This is a direct result of the close proximity of the airstrip in Iliamna, Nondalton and Keys Point. Local residents have noticed the increased incidents in trespass, litter, and damaged stream banks and spawning habits. This road would help the managers monitor these activities. That would include the native corporations, DNR, ADF&G, National Park Services would have access to that road to be able to monitor that better.

Road Classification: The section of road from Alexy Creek to Fish Camp has received maintenance on a more regular basis than is actually indicated by the EA. _____ from the Nondalton side or Iliamna side whether there's been more maintenance there than the EA indicates. Some maintenance has been done by _____ Corporation, in addition both Iliamna, Nondalton have received states revenue sharing money to maintain some of the road. This is part because the City of Nondalton has made, has had to actually drive their heavy equipment across the Newhalen River in the past.

Environmental consequence: The borough deeply appreciates the through discussion regarding environmental justice provided by the EA. We strongly agree that the build options results in significant social, cultural and economic benefits to the resident and population. The borough concluded that the no build options is actually one which would cause more damage disproportionately.

High adverse impacts on minority and low income populations with respect to human and health environment. The people of Nondalton and the region at-large want to participate in the American dream. They have the right to expect access to goods and services in health care, good public facilities, and good quality of life. Most of this is taken for granted in other parts of America. The simple fact that you can drive down to the grocery store and buy a gallon of milk, even though it will cost you five or six dollars, but you can get there to get it in a vehicle verses risk your life going across a lake to get it. A lot of people in America that's a common thing that everybody can do today. Some of these people can't do that that live in Nondalton. Ok the big thing is, the most important thing is, is that concludes our, the fact this EA does cover anything that might be needed for the outcome of the environmental impact statement. EIS is not necessary or appropriate. The EA has not identified any significant potential environmental impacts that _____. Basically that concludes our comments. We appreciate the opportunity to comment in person, we'll put a formal written comment in to the state and please don't hesitate to contact us anytime you need. And I encourage everybody here today to take the time _____ its worth a lot more on paper with facts and specifics at what you can do. Because that's what they need, she needs more facts and specifics. That way if someone tries to take it to court there is substancial evidence to back it up. Thank you."

Wassie Balluta

"Hi my name is Wassie Balluta, I'm from Newhalen. I was born and raised in Nondalton/Newhalen -67. I've been on the borough assembly for the Lake and Pen and also the past mayor for Newhalen. And this projects been on the books since 1980 (**too much noise in the background**). and they have numerous studies, numerous hearings and I think we waste a lot of money on hearings and consultants the state gotta get on and finish their project. And for myself the project not gonna be done they're gonna have to reclaim the whole length of the old way the state destroys us. Make it like a natural bridge as before, if they are not going to do their project. But we want the project to go through. Everybody, it would make it a lot easier for the people from Nondalton and Newhalen to commute and visit. I'm sure that as you heard before that there's numerous accidents on the road and when the road is first put in in 1980's, I lost a sister on the road when she drowned. Because the state had big ditches, not filled, and my sister did drown on the road they're coming down. And the state of really neglect right now, I mean anything could

happen on the road, I mean its very hazardous. And people are loosing their vehicles and that's costs them thousands and thousands dollars just to get them repaired every year from that road. Either the ice or the mud. And I think the states gona have to come up with, either finish that road or go just away and reclaim the whole area. But we have, I'm also the vice president of _____ Electrical Lights and we do have our buried cable between here and Nondalton. And we do maintain our lines on that. It's very crucial that we keep the lines going. This project gotta get on the road, I mean, its year 2000, what kinda work, wait for another century? That have it done as soon as possible. The longer you wait the more it cost. I no whether the cost right now but imagines the cost went up I the 80's. For myself I would rather have that, I'd rather see this project be done. There's a lot of people are against it but for personal reasons. Like a lot is lodge owners or air taxi operators. They're saying that we're having all the problems of drugs and all and tourist. But these people already fly in; you don't need a road for all these people come in. But this road would make it a lot easier for a lot of people. I mean a lot of people couldn't, the fuel prices going up right now, the oil, and in order to fly to Nondalton, I imagine its fuel cost three or four dollars a gallon. And also food, we're talking about emergencies and stuff. Iliamna is more accessible than Nondalton. Get out of this and then got hurt. And actually Iliamna is the central kinda of spokes for the whole Lake Iliamna region. And I think this road would be benefit the state and also the community. And for myself I would rather see the roads completed and get going this year or next year but as soon as possible as soon as they can do something about it. I'm tired of having these hearings, and all these consultants telling you this and that. They're spending more money on consultants and hearing than the road project. If they can be doing that I'd rather see the state come and fix all our vehicles every year and Iliamna area try to go to Nondalton. Thank you."

Fedosih Balluta

"I'm Fedosih Balluta and I've been living here in Newhalen 56 years it'll be on May 10th. All my life we've been fighting this road to get it that, I'd like to have it done. It'll be easier for our kids, and maybe in the future years, we'll have high school, _____ and it'll get the cost down on living on the Nondalton and Newhalen. That's all."

FEBRUARY 29,2000 – NONDALTON COMMUNITY BUILDING

Eva Leveque

"My name is Eva Laveque formally before Eva Wilson. I'm a 50 year resident of Nondalton. I do believe we need this road and bridge, I've lived here all my life. I've seen real slow improvement, its really real expensive for us to get anything, I'm also a small business owner. To get anything in and out of here which makes rates higher for residents here. Gas and oil are hard to get; groceries are hard to get. If we had a road from here to Iliamna, which is the hub of the area, we would be able to access these things with a little bit more reasonable price and stuff. At this point everything has to be flown in and out, and it just depends on the weather and the conditions of the field as if we get it. Also for medical reasons all of our emergencies have to be Medi-Vac out. I myself was Medi-Vacd not too long ago and almost didn't make it because of the weather. I might not be here today because of that. If that road and bridge were there we could of went to Iliamna and got on the big plane. As it was we couldn't. The road was closed because of the snow. Nobody to maintain the road because its not a state highway. So, that's just a few reasons why we need the road and bridge. Medical is a big part of it. The other big part of it is access to somewhere where we can get our supplies in and out. Our oil and gas and food. As it is now we can fly in and out of Nondalton there is no road access to anywhere and it has us closed off especially in the spring months. We can't get in or out when the lake is froze when the lake is breaking up. We can't get in or out the field is soft we can't even fly out. So I think we need this road and bridge if just for those reasons alone. There are a lot of other reasons that we need the road and bridge, right now my mind went blank so I'm not going to be able to say what they are. But thank you, bye."

Dimond Jim Wilson

"Yes, my name is Dimond Jim Wilson. I was the mayor when we initiated the road and the electric coop. We did the first formal EA on the road because of the Corp of Engineer said that from their _____ portion

that there was 90 % wetlands. So I walked them from Iliamna to the end of the road project on the Iliamna side and their feet never got wet. But what I want to comment on here is the boat launch. We totally understand the fact that most bridges throughout Alaska, United States and wherever, have a boat launch or they fish under the bridge and all of that. Is private property on both sides of the bridge approaches and of there are two boat launches. One that has been there for over 30 years which is halfway to Ilimana-Nondalton. And has good access to road. ___ I see no reason and its shallow and its got a nice deep spots for launching whatever boats you want. And Nondalton City has also proposed to the council that we need a boat launch here in the city so that it can be patrolled and some control of vandalism and crossing private property will be at a minimum. Other than that, I don't believe that there should be an additional EA done on any of the project. I think we've been over studied, and I don't think that another year of study is going to really help stop it or make it go any faster. It seems that nobody in, outside of our communities of Newhalen, Nondalton, Iliamna seem to think that we should have the excess, all of the goods that everyone else has in the United States. I think those comments have already been made. But, I mean we'd like to have, I have a small business, I have a bed and breakfast and a lodge, and my business would be totally improved, I'm putting in a restaurant. I just been working on that all winter. And the bridge would help because there was somewhere in the neighborhood of around 50,000 tourist in Iliamna in 99. So, the access between both communities, we understand our life style will change, but we have to go forward. We just can't stay a third world city. That's basically what we are. We have to haul 5 gallon, 10 gallons at a time of gas or oil from Iliamna, which is over 25 miles away. Sometimes its snow storms, sometimes in rain and we have to across water, and go across ice, and its dangerous because sometimes we have to take our children with us. So, this road would be a safety net for everyone here. This winter we've had 2 vehicles go through the ice. Fortunately we didn't have any fatalities from that. Our airstrip is about 300 foot short. There is no way that the DOT will extend our airstrip because we've got to cross a creek and the fish and game won't let us extend our airport and we already have a jet airport at Iliamna. And we can Medi-Vac out of there and if we had a we can run our ambulance. It takes about 45 minutes, 40-45 minutes to run down to Iliamna from here and we can save a lot of lives. And I certainly thank you for listening to my testimony."

Dennis Trefon

"I am a resident of Nondalton. I'm also a Nondalton tribal council Vice-President and as a council member we had not formulated an opinion on for or against the road. We all left it as personal. Personal opinion of everyone, because we didn't want to sway any person on their personal opinion because of it being just tribal council. They can all come and voice their own opinions. And we have at the last minute received a letter from Mike McKinney. You have a copy of that? That was addressed to Jerry Ruehle, I'm sorry I'm, he's environmental coordinator. I'm not sure if that's his name. Saying correct me, but anyway he list out 12 things and you have a copy of the tribal councils opinion on his letter which we hope you take into account because of he is not a resident, and we think his opinion is his opinion and it doesn't reflect and should not reflect to residents of this village. And especially Iliamna and Newhalen because he has not even been there I don't think. My only concern is there was three options for the access. Two accesses which include a ramp and a boat launch at the bridge site. I am opposed that 100 percent on any access from the bridge. There should not be any public access along it because there is access in Nondalton. Throughout the city of Nondalton there's many roads down. There's road A, B, C and D that can access the lake for boat launches if it need be. And there's also one in Iliamna called the Landing on the Newhalen river, approximately 6 miles from Nondalton which has good access roads from Iliamna and it's a traditional boat launch area and there shouldn't be any redundant boat launches for any purposes because of the bridge. And the site they've got is low. The water is low, typically low and very swift and it could be could pose a hazard to the public if they tried to launch a boat there and they are not familiar with the lake, the river, river conditions and water conditions, cause the water is swift and it is cold. It's a hazard, become a hazard more of a convenience. There isn't any need to spend that extra money. They could put that extra money into upgrading one in Nondalton if that's what they really need to do. And that would be just fine with us, but no access because of the trespass issue within the fish camps within 3 to 400 feet of the site of the bridge. And if you put a parking lot there there'd be a natural

access to the fish camps and we do not want that and I'm sure those on that side of the river will not appreciate people walking and driving right up to their fish camps. If they had a way to access that they would. Because trespass is a major issue with private residents and Kijik Corporation, who owns the lands surrounding the areas. You get them a road of access they will use it. So if you do not put that access in there, it will not become an issue so they would just come right in to Nondalton or go right on down to Iliamna. Don't make it a stopping point and that would be something that we need to keep out of the bridge area. There may be some overlook on the other side, but that's naturally been there because of the way the road kinda ends there so they may be something over there but that overlook is something that they'll be alright as an overlook. It certainly can't be a boat launch and we just need to keep the boat launch out of there and make the access in Nondalton and upgrade possibly if they want if they really wanted to better access, upgrade the one in Landing. Then that would be fine with a lot of people and its always been public access so there shouldn't be any problem with everybody agreeing to upgrade one landing in Newhalen river or upgrade or build something in Nondalton. That was my only concerns, so thank you."

MARCH 1,2000 – ADOT & PF BUILDING, 4111 AVIATION DR. ANCHORAGE

Eva Leveque

"My name is Eva Leveque I'm a 50 year resident of Nondalton and I work as the alcohol counselor substance abuse counselor and family service worker in the village. Where shall I start? You know I work with the kids a lot in the schools in Nondalton and from some of the children prospective there, they passed on to me that you know if we did get this road and bridge through we could possibly have a regional high school for our kids there. Now a regional high school would be a lot bigger than any of the little high schools we have in the villages. And it could offer a lot more education wise. It would be an enhancement to our educational system back there. This is something that is being looked at now and talked about. Its something the kids think is a very good ideal. And I believe it too. This past winter was a hard winter for us; it was a cold winter. And we have a hard time with transportation, the planes landing on the field. They won't land if there is a crosswind. Or if the field conditions are bad. Heating oil is a major problem because the field plane won't land if there is a crosswind or conditions are bad and some people had to go without oil, some people burned wood, and some people don't even have wood stoves. So they couldn't burn wood and I don't know what they did. Some moved in with relatives and stuff I guess. But the problem you know if we had the road and bridge we'd have access to Iliamna. They have oil all the time down there and we could get oil from them. It would also eliminate the cost, the high cost, of flying supplies back and forth to Iliamna, from Iliamna to Nondalton. The road and bridge would eliminate that cost and it is a costly burden to the Nondalton residents. At the present we are limited by weather and field conditions as to travel. But if the road and bridge went through we could you know take a truck down to Iliamna and get on ERA, one of the other planes from Iliamna. Iliamna has a field, a big field down there, compared to us and we'll never extend our field because of the, I don't know its federally protected land around our field, so we'll never be able to extend our field because of it. As a family service worker and counselor, I service Pedro Bay, Nondalton, and I pick up overflow in Newhalen and Iliamna. As it is now, I can only go to the villages or service the villages those villages once every one and a half month because of funding. The budget has been severely cut in our area, especially for travel. There is a need though in the villages to be serviced at least once a week. If the road went through I'd be able to do that. If not, then God knows how many times a month or a year I'd be able to service those villages. As a family service worker too, also, I could have regular visits with those villages, but as it is now I can't have regular visits. It all depends on the weather, if the planes can take me or not and sometimes that doesn't even happen. So, that's another necessity that we need to look at when we're looking at this road. I live in Nondalton year round, I still do, and so I don't have to worry about oh, I'm trying to read without my glasses and I can't. OK, sometimes you know, in Nondalton we have really long winters and this was one of them. Gas and heating oil would be a lot cheaper if the road

went through. You know sometimes I get angry when I find out people are trying to stop the road and bridge because they don't live the hardships we live in the village. We as residents and you know, I especially think about that when I think about our health. It's the hardships that they have to go through because of accessibility. To get patients out of the village when a patients are severely sick. You know some of the times when we need to get people out of that village; it's a matter of life and death. Sometimes the planes can't land on that field, sometimes we have to wait for weather and so on and so forth and I wonder when I think about that how many people you know could be alive today if we had the road to Iliamna that would allow us to take patients down there with an ambulance and a bigger plane could pick them up, the Medi-Vac plane. I sometimes wonder if some of my good friends would be alive today if that were so. And you're always able to get them to a hospital sooner if we had their accessibility. Thank you."

Eleanor Johnson

"My name is Eleanor Johnson and I'm president and chairperson and CEO of Kijik Corporation and I was also born and raised in Nondalton and lived there for the first few decades of my life. Basically I'm here tonight to express support for the Nondalton-Iliamna road and bridge project. I'm also here to address concerns for the many people of Nondalton who contacted me prior to your scheduled hearing at Iliamna and Nondalton. These people wanted me to travel to Nondalton to give this presentation but I assured them my testimony here in Anchorage would be sufficient. I'm here more specifically to address a certain letter written in opposition of the bridge by Mr. Michael McKinney and the letter was the Feb 2nd, 2000, letter addressed to Jerry O. Ruehle. First of all I'd like to state that I respect the freedom of speech so I understand that this Mr. McKinney has every right to express his opinion. But I think a few things need to be said concerning his letter because I feel that it was filled with many misrepresentations and some outright lies. It's my understanding that Mr. McKinney recently purchased this property and he's visited Nondalton on a couple of occasions within the past couple of years to hunt and fish. Having said that, I feel that he was in no position what so ever to speak on behalf of the people of Nondalton and I don't see anywhere were he was authorized to do so. I believe that the Department of Transportation & Public Facilities would hopefully keep in mind that this is one person's opinion and he was not authorized to make those comments on behalf of the people. I would like to make that perfectly clear. His comments are based on assumptions and have not basis and fact, he is not a resident nor is he someone who has been raised in bush Alaska. Even his assumptions are not based on his personal experience. My guess is that his assumptions are based on merely on hearsay. This gentleman is a clear case of quote unquote "too little knowledge can be a very dangerous thing". I'll refer to his letter as I go along. His letter is numbered; he's got numbers one through ten in his letter. But the first point he made is he made a statement that the road will increase the likelihood of people driving from Nondalton to Iliamna to buy alcohol. He talked about people getting killed and disabled. He made many statements in this letter, that at the very least was very slanderous. The bridge will increase the likelihood of people driving to and from Nondalton. I'm sure that's quite possible. But he can't say that these people are driving for the sole purpose of purchasing alcohol because there is no store in Iliamna that sells alcohol. Secondly Medi-Vacs have been a way life in Nondalton. Medi-Vacs coming in have not been the problem, they are almost always able to land in Iliamna. The trip between Nondalton and Iliamna is where the problem usually arises. And the weather is usually ok for the large Medi Vac plane to land but the delays usually happen due to the inability to fly the person to Iliamna. When this happens people need to travel by boat, and some sort of vehicle. In order to do this it is necessary for them to trespass on private lands. Perhaps we'll one day have a medical facility here with the population to sustain it. Currently we have health aids in the community with a link between the two communities. We will also have access to the expertise and experience of the health aids from the neighboring community. In essence giving us double the access to medical services. On paragraph two just to say a little bit about how he started off this paragraph. He says a road will increase the consumption of drugs and alcohol in a village where a large percentage of adults are alcoholics, drug abusers or potheads. This will increase the percentage of infants born with cocaine addition and fetal alcohol syndrome which will be a burden to society and he goes on and on. The contents of this paragraph coming from someone who visits the village no more than a few times is nothing more than slander. The mention of an alleged suicide is not based on fact. Facts are

known only to this person's family. Mr. McKinney is doing nothing more than sensationalizing events to fit his unfounded accusations. Mr. McKinney clearly does not have enough facts on which to base his assumptions and Mr. McKinney may have a college degree but no way does it prove that he is in fact knowledgeable about the people or the area. I personally take offense to his comments and do so on behalf of my family, friends and relatives in Nondalton. He covers a few other things. He does have some good points in it; I will say that, because there are concerns that are not new news. In his paragraph number 3 we've been talking with you guys for quite some time now. And we trust that Fish and Game management with the aid of local representatives will prudently manage the resources to comply with the state and federal laws. Yes, there are some people who have sold their native allotment, which is entirely their choice and yes someone sold theirs to this outsider named Mr. Michael McKinney. We have found it quite difficult to address some of Mr. McKinney's conclusions on the self-esteem of ourselves. If it is a fact then who is to say whether it is a result of. The factors may be numerous and could quite likely have stemmed from something else. This is nothing but an arbitrary and capricious and sweeping generalization. On his paragraph number 4 he talks about the maintenance of the road and talking about there being no money for the maintenance of the roads and that would be a big problem. To my knowledge the state allocates funds based on per capita to operate the city and municipal governments. In all the years of traveling to and from Iliamna by various vehicles the road has never been impassable. In fact plowing the road has been a joint effort by the communities who will be directly linked by building this bridge. Plowing the bridge should not add that much extra to an already existing roadway, which has a municipal maintenance budget in effect. In fact in the winter more area or amount of ice is plowed than there would be if there was a bridge, or at least comparable. In his paragraph number 5, he talks about paving the road. In everything I've read so far I have not seen anything about paving that road. If that is in fact a plan, then it's something I've overlooked, but my comments to that were, if the road is not going to be paved then this person was merely misinformed and it should be justly noted. Speaking of local hire and contractors, it should be said that there exists no one to my knowledge in the immediate area who can undertake a project of this size and magnitude. Perhaps the tribal council may under the _____ contracting they may have the capabilities. But that's to my knowledge, the only ones that would be able to take on the project of that size. I guess that is unless you want to include people from Port Alsworth or Keys Point. If there exist a bondable general contractor in the immediate vicinity, then that company should have been included in the bid process. And if they are, if they are general contractors, they'd know about the whole bid process. On paragraph number 6; he's talking about local hire. I don't happen to like some of his words he choose. But, I think that although the joblessness and unemployment rate are high in bush Alaska, this bridge is not meant to be a quick fix for all aspects of what may be wrong with the communities. Rather it should help Nondalton residents would now be able to compete and commute to jobs in either Iliamna or Newhalen. For example, paragraph number 7 talks about chemicals used on the road, de-icing and all that. Which I don't think applies it's not going to be paved. My comment was I have nothing further to say on the contents of this paragraph providing that all state and federal laws are followed handling chemicals used on asphalt if that is the case. This too is a moot point providing that there are no plans to pave this road in the future. Paragraph number 8 talks about studies and the herds and migratory paths. I have no further comment on this paragraph except to say that this is not new territory being explored here. These issues have been in the forefront of concerns for many interested residents of the state and the country. As we learned last year the argument about the bridge and the road is gone throughout the nation basically thanks to a few people.

Paragraph number 9; in paragraph number 9 he talks about a planner's conspiracy to build roads all over the place. But the problem that I had with that paragraph number 9 is he says nearly all who spoke in favor of the road, well let me read ahead here, this paragraph contains the ranting and raving of a mad man. A person, who by the way, was raised and educated in the lower 48. The one sentence, which needs correction, is nearly all who spoke in favor of the road are fishing and hunting lodge owners. Well we all know that's not true. Statement needs to be made to note that the residents of the three affected communities overwhelmingly supports the bridge project. OK paragraph number 10, he talks a little more about the road will only benefit big business and not help local people. And then he goes on to talk

about the lack of college education and at any rate it is mere speculation that the bridge will only benefit big businesses. The statement that the bridge construction will put no more than twenty five percent of the local residents to work may or may not be true. The construction phase is not as important to the residents as the actual bridge being in existence. And that's the feeling that I've gotten. Secondly the local air taxi shouldn't feel much of an impact because the rates are comparable to ERA's which is another thing that he stated in his letter. The added cost comes in when the weathers too bad to get there by boat and truck and people are forced to take small air taxi to Iliamna to get on the ERA flight. The local air taxi's business originates from the Lake and Pen area in Anchorage. The bridge should [have] little to no effect on them. Lastly the level of education or the lack of a college degree is not a critical factor in the residence decision to support the bridge. It doesn't take a rocket scientist to come to the decision that the bridge is not only needed, but it is fact wanted by the majority of the residences in three communities. Paragraph number 11, is really the paragraph that got me here tonight. And he talked about a road and bridge will increase the incidence of trespass on native allotments, poaching and illegal fishing. And then he brings Kijik Corporation into it. That's when I got mad. Trespass is an ongoing issue statewide and has nothing to do with the bridge in Nondalton. As for the numerous lodges in the area, we in Nondalton have co-existed with these lodges for several decades. None of the problems mentioned in Mr. McKinneys letter is new news nor is it a problem which the bridge will create. Rather in the case of Kijik Corporation the bridge will allow the interior lands to be patrolled easier. Mr. McKinney also made allegations as to Kijik's financial stability and employee. Like he said it, it's just his opinion and as far as we are concerned it is non-of his concern. There is no basis and fact here. Kijik does have a trespass officer, but that person is hired to patrol Kijik property only. What we pay our employee is our business and the Department of Transportation nor Mr. McKinney has no business in our business. Mr. McKinney makes a statement with a lot of people in Nondalton and I. He starts his paragraph off that way. Again Mr. McKinney is speaking on behalf of the people of Nondalton without their consent. In the next paragraph Mr. McKinney begs you to not build a bridge which is not wanted or needed. Please keep in mind that again he is speaking on behalf of the people of Nondalton without their consent. And he is surely not expressing their views. Understand that you are accepting written comments from the public. My intentions are to submit these comments in letter form to Mr. Ruehle the environmental coordinator. In conclusions I feel that it is imperative that this organization and facilities or affiliates be very careful to stick to the facts and keep in mind what it is we are trying to accomplish here. Here say, outright lies and innuendoes or malicious statements like Mr. McKinneys have no place in a proceeding like this. I also think that the moment that Kijik Corporation mentioned that your organization should have sent us a copy of this letter so we have to opportunity to address any of the misrepresentation or the outright lies. Thank you very much."

Ben Trefon

"My name is Ben Trefon and I'm from Nondalton. And Mr. McKinney didn't speak for me. I am for the roads; it'll be better economically for everybody on the road system after the bridge is there. And for medical care, emergency evacuation. It'll improve, you know I mean for and with the road there eventually all the communities will probably consolidate a medical facility that besides the local clinics. That's pretty much all I got to say. Anything else I better at expressing myself writing there so I'll add more to that."

PETITION FOR ILIAMNA-NEWHALEN-NONDALTON ROAD PROJECT

We the people of Iliamna and Newhalen are submitting this petition in support of the Iliamna-Nondalton road project. The duly signed residents of Iliamna and Newhalen have signed this petition to have the State of Alaska (DOT) complete the road and bridge to Nondalton.

Name	Address	Date
Glenn Anderson	Iliamna, AK 99606	3/03/00
Edith Lewis	Iliamna Ak	3/3/00
James R. Lemons	Iliamna Ak.	3/3/00
Maria Wilson	Iliamna 3300	
Esther Foss	Iliamna AK 99606	3/3/00
Evelyn Lambert	Newhalen	3-3-00
Katie Olympic	Newhalen	3-3-00
Loree Anelon	Iliamna, Ak	3-3-00
Myrtle Anelon	Iliamna Ak 99606	
Marian L. Lamotons	Iliamna AK 99606	3/3/00
Shirley Yudinick	ILIAMNA AK	3-3-00
Dwight Anelon	Iliamna	3-3-00
Tom Wassillie	Newhalen AK	3-3-00
Owen Roberts	Newhalen AK	3-3-00
Deann M. Dowell	Iliamna AK	3-3-00
Tim Anelon Jr.	Iliamna AK	3-3-00
David M. Parks Jr.	Newhalen AK	3-3-00
Michelle Waskey	Newhalen AK	3-3-00
Elena Chuneak	Newhalen AK	3-3-00
Sheena Ishnook	Newhalen AK	3-3-00
Rex POWERS	Iliamna AK	3-3-00
Dean John	Newhalen	3-3-00

PETITION FOR ILIAMNA-NEWHALEN-NONDALTON ROAD PROJECT

We the people of Iliamna and Newhalen are submitting this petition in support of the Iliamna-Nondalton road project. The duly signed residents of Iliamna and Newhalen have signed this petition to have the State of Alaska (DOT) complete the road and bridge to Nondalton.

Name	Address	Date
Matthew Roberts	Newhalen AK	3/03/00
Jessella Johnson	Iliamna, AK	3/03/00
Maedene Kruschke	Newhalen, AK	3-03-00
Ramona Batchelder	Iliamna, AK	3-03-00
Kimberly Rychmowsky	Newhalen, AK	3-03-00
Jennifer Wassillie	Newhalen, AK	3-03-00
Jolene Jackinsky	Newhalen, AK	3-3-00
Chester Hornberger	Newhalen, AK	3-3-00
Basil Ishnook	Newhalen, AK	3-3-00
Sylvia Wassillie	Newhalen, AK	3-3-00
Savannah Anelon	Newhalen, AK	3-3-00
Lee Ludvick	Iliamna, AK	3-3-00
Scott A. McArthur	Iliamna	3-3-00
John Kruschke Jr.	Newhalen	3-3-00
Michael Parks	Newhalen	3-3-00
Paula Thompson	Iliamna	3-3-00
Marian Kelyn Wassillie	Newhalen	3-3-00
Maxie Wassillie	Newhalen	3-3-00
Janet Janutich	Newhalen	3-3-00
Lina Hamberger	Newhalen	3-3-00
Dawn M Wassillie	Newhalen AK	3-3-00
Federica Bullata	Newhalen, AK	3-3-2000

PETITION FOR ILIAMNA-NEWHALEN-NONDALTON ROAD PROJECT

51951

We the people of Iliamna and Newhalen are submitting this petition in support of the Iliamna-Nondalton road project. The duly signed residents of Iliamna and Newhalen have signed this petition to have the State of Alaska (DOT) complete the road and bridge to Nondalton.

MAR 13 1900

Name	Address	Date	RECONSTRUCTION CENTRAL REGION		
Mary Anderson	P.O. Box 45 Newhalen	3-10-00	Project Engineer		
John Wasky	Newhalen	3-10-00	Assistant		
WASSIE W. NICKOL	BOX 171 Newhalen	3-10-00	Highways District		
Ed Lester	Box 72 Newhalen	3-10-00	POB		
Jeffrey Clay	Box 172 Newhalen	3-10-00	ROW		
Tom Batchelder	Box 157 Iliamna	3/10/00	FEAS		
ELAN ROEHL Jr	ILIAMNA, AK.	3-10-00	OWNER		
Ronald WASSILLIE	Newhalen, AK	3-10-00	RECEIVED		
Paul M. Small	Iliamna AK	3-10-00	CENTRAL FILE		
Nancy Adcox	ILIAMNA, AK	3-10-00	action		
George Hornberger	Newhalen AK	3-10-00	Prelim. Design & Environmental Section	COPI	ACTION
Gary Bromiley	P.O. Box 268 Iliamna AK	3-10-00	PD&E Engr.		
JOEL NEWTON	P.O. Box 87 Iliamna, AK	3-10-00	Project Mgr.		
Jerry Armstrong	P.O. Box 86 Iliamna Ak.	3-10-00	Env. Coord.	JR	1
Jane Armstrong	P.O. Box 86 Iliamna Ak	3-10-00	Env. Team Leader		
John R. Adcox	Box 206 Iliamna Ak	3-10-00	Staff		
Brian Lyman	Box 69 Iliamna AK	3-10-00	Hydrologist		
Alex Chynsi	Box 130 Newhalen Ak	3-10-00	Project Mgr.		2
Cliff Kyr	Box 130 Newhalen Ak	3-10-00	Central File		
Peter John	Box 112 Newhalen ak	3-10-00			

FEB 03 '00

9715 Independence Dr. #101
Anchorage, Alaska 99507

February 2, 2000

Jerry O. Ruekle
Environmental Coordinator
Preliminary Design and Environmental
AK. Dept. of Transportation & Public Facilities
P.O. Box 196900
Anchorage, AK. 99519-6900

Prelim. Design & Environmental Section	APP	ACTION
PD&E Engr.		
Project Mgr.		
Env. Coord.		
Env. Team Leader		
Staff		
Hydrologist		
Project File		
Central File		

Re: Iliamna-Nondalton Road Improvements, Project No. STP-0214(3)/51951

Dear Mr. Ruekle:

My name is Mike McKinney and I own land in Nondalton, Alaska, where you plan on building a bridge. My wife and I plan on living in Nondalton after I retire in a few years, and I've visited Nondalton a number of times. My wife is from Pedro Bay, which is near Nondalton, and she used to live in Nondalton. I've gotten to know a lot of residents of Nondalton and some of them might feel as I do about this proposed (Iliamna-Nondalton Road Improvements, Project No. STP-0214(3)/51951, Environmental Assessment (Jan. 2000)) road/bridge construction project, as described in the Environmental Assessment booklet with the same name.

I would like to request that my name, letter, and enclosed attachments be included in the comment record regarding the proposed Iliamna-Nondalton Road Improvements, Project No. STP-0214(3)/51951 bridge/road project.

I would like to come out and say that I **OPPOSE** the building of a road and a bridge from Iliamna to Nondalton based on several issues. I also know that I am not alone and that others in Nondalton might feel as I do, and are against this road construction until some of the issues that I'm concerned about are addressed. **I OPPOSE this construction project for the following reasons and would like your department to address them:**

(1). A road will increase the likelihood people driving from Nondalton to Iliamna to buy alcohol. This will increase the chances of people getting killed or disabled in wrecks and happened a number of times already. There is no major hospital in the area and all critically injured accident victims have to be flown out on an Emergency Medivac flight that costs thousands of dollars. The chances of someone surviving a bad accident is very slim due to the time it takes to fly out, the remoteness, and lack of properly equipped and staffed medical facilities in the area. So... even though proponents say a bridge linking Nondalton to Iliamna will increase the safety of the residents, it will still take flying 1 hour to 1.5 hours to reach a first class hospital in Anchorage even if the accident happened right in Nondalton itself. (Also see page B-50). Does the State of Alaska plan on building and/or improving the medical facilities in Nondalton, Iliamna, and Newhalen? I think the money would be better spent on a first class emergency medical clinic instead of a bridge!

1

(2). A road will increase the consumption of drugs and alcohol in a village where a large percentage of adults are alcoholics, drug abusers, or "Pot-Heads". This will increase the percentage of infants born with Cocaine Addiction and Fetal Alcohol Syndrome, which will be a burden to society, and especially to the people Nondalton. Substance Abuse is a major problem in the area and causes the Natives no end of misery. People loose hope and kill themselves due to substance abuse as just recently happened this past month (Jan. 2000) when a young man shot and killed himself in Nondalton. And because there is so much substance abuse this is the major reason for a lot of people (from the whole Lake & Penn area and also other "Bush" communities in Alaska) falling through the ice, because they were going some where to get more. Does the State of Alaska plan on providing funding to combat the use of alcohol, drugs, and "Pot" in Nondalton and surrounding villages?

2

(3). A road will **increase the number of people from outside** of Nondalton to come and hunt the limited number of large game needed by the people of Nondalton to survive on for food. More people hunting here will deplete the game population beyond repair to the detriment of the people of Nondalton. People are loosing hope and having to sell their land, which is being bought up by "Outsiders" who don't care about the land, the game, the people, or the Native Culture/Way of Life. When Nondalton Natives see Non-Native/Resident people move in and who weren't born in Nondalton and become successful this causes the self-esteem of Natives to go way down, and make them feel even worse about themselves.

3

(4). A road will need to be maintained and there is already a lack of funding for rural services due to the prejudices of "Urban" lawmakers in Juneau. **Who will pay to maintain the road?** Nondalton does not have money to maintain a road. The State of Alaska will have to pay for the maintenance of the road. The State's Political Leaders who work in the Anus of Alaska in Juneau have proven themselves by their slothful disdain for anything remotely disconnected from their sponsors' interests, and who only want to make Alaska their Private Playground, and won't pay for anything in the "Bush"! In fact, as far as I know, no mention is made in the Environmental Assessment (Jan. 2000) booklet on who will pay to maintain the road. One of the reasons for the road according to the booklet is the protection of the creeks (figure 11) flowing under the road. The State of Alaska has done nothing in the past to protect the creeks, what makes anyone think the State of Alaska will maintain the road to protect the creeks in the future? However, the Environmental Booklet says one plan is to have local governments pay (page B-40). Maybe taxing local owners of cars/trucks (maybe 4-Wheelers too?) to pay for the maintenance of the road will work! **Will the State of Alaska open a Division of Motor Vehicles office in the area? Will local owners of cars, trucks, 4-Wheelers, etc, be required to pay a tax to maintain the road?**

4

(5). A road **already exists** and there is not a need to pave it and build a bridge. This is a **waste of taxpayer's dollars** and "Pork Barrel Politics" at its worst just so an Anchorage contractor can get rich on other people's misery. And speaking of which, will local Alaska Contractors be building the road and bridge? Will the road be paved with asphalt and cause an increase in water run-off and erode the edges of the road where the culverts are located near creeks?

5

(6). I'm also concerned that if the road/bridge is built, how many people that live in Nondalton will be able to get a job on the project? **What guarantees are there that there will be any "local hire"?** Nondalton has almost 43% unemployment rate (according to Alaska Department of Community & Economic Development-enclosed). Many projects that are built here and in the "Bush" don't help the local residents at all! I think the people in Nondalton don't want an Anchorage contractor who will bring in his "own crew", do a half-ass job, make his money, and leave the Nondalton residents to fix and pay for his sloppy work!

6

(7). **Will de-icing chemicals be used on this road?** If so, what will be the environmental effects on the Newhalen River beside the road that flows out of Lake Clark, into Lake Iliamna, and into Bristol Bay which is the richest fishing area in the State? **Will the State of Alaska clean up any hazardous waste or materials in the area that is generated by the bridge construction? If so, where will it be disposed?**

7

(8). **What studies have been done to see if the construction and the road itself will not effect and harm the migration of one of the area's largest caribou herds in Alaska?** Will the construction effect caribou in the area that are calving? Will construction be going on while the caribou are migrating through the area and possibly disrupt their migratory pattern? The Alaska Department of Fish & Game said in the Environmental Booklet (Jan. 2000) that it studied the possible effect of the road on creeks flowing under the road on fish. But no mention as far as I know is made of studies done for any possible effect on large game animals such as migrating caribou, which is one main food sources of the local residents. Why?

8

(9). **Is this part of some "plan" or "conspiracy" to later on build the road to Port Alsworth, then to Tyonek, to Wasilla, and then to Anchorage?** Where does the road stop in future plans? The Environmental Assessment, Jan. 2000 Booklet, produced by the Alaska Department of Transportation makes mention of the Cominco Mine. One of the plans mentioned (page 37 & B-36)) is to link the mine with a road to Pedro Bay to Williamsport on Cook Inlet, then on to Homer to off/on-load the ore on

9

freighters. Mention is also made of someday linking Iliamna with Port Alsworth farther up Lake Clark. Nearly all, who spoke in favor of the road are (see page B-62) fishing and hunting lodge owners, (most also have addresses listed outside of Alaska in the "Lower 48"), see this as a way of gaining more business, and access to other areas where they can take their clients.

(10). **This road will only benefit "Big Business" and not help any local people (see page 39). According to the Alaska Dept. of Labor, in the February 2000 issue of the "Alaska Economic Trends" (enclosed article) magazine, page 15, the Lake & Penn. Area only has 25% local resident hire.** This doesn't sound like the bridge will help the economy of, or get jobs for the local residents to me. In fact, it will cost jobs and small businesses like the small Air Taxi Operators to go out of business. They will have to compete with ERA Aviation since they're "cheaper" compared to Birch Wood Air, Lake Clark Air, and Wilder Aviation (to name a few in the area that I'm aware of).

In addition, I'm not aware of many Native people in Nondalton who have a college education, training, experience, etc...to run a big (\$200,000+ yearly) business with any chance of success. See attached Alaska Community Database that shows how many people make over \$150,000/yr... only 2 people do and I bet they're not Native! The assumption (on page B-48) of the Alaska Department of Transportation that the bridge/road will lessen city service costs in Nondalton by increasing sales taxes in Nondalton to "stimulate cash flow from sales tax" has no basis in fact. To me, this is just "bait" to get the Nondalton residents to vote in favor of a road/bridge so in the future more roads can be justified and built. Does the Alaska Department of Transportation have any on going, current studies or plans of building a road from the Cominco Mine now or in the future? What studies have been done to measure the economic impact on the residents of Nondalton and the surrounding towns if this bridge is built?

(11). **A road/bridge will increase the incidents of trespass on Native Allotments, poaching, and illegal fishing practices by clients of the numerous lodges (pages A-42 to A-44) who are mostly owned by Non-Natives.** There's only 1 person that I know of hired by Kijik to patrol the whole area from the road to the Chulitna River and 1 person isn't going to be able to patrol the whole area. This will increase the cost to Kijik, as they will have to hire more people and pay them over a longer period of time, as more non-residents will be able to access the area. In my opinion, Kijik is just "barely making it", and can't afford to hire many people over a sustained period of time at wages high enough for anyone to survive on, and live in Nondalton at the same time. Will the State of Alaska provide more funding to hire a State Trooper to protect the fish and game, stop crime, trespassers, etc...?

(12). **How high will the bridge be above the water line?** There are some people who own boats that are pretty tall, and need to know this as it will determine if there will be any restrictions in accessing parts of the river to and from Nondalton below the proposed bridge site.

A lot people in Nondalton and I would like to know the answers to these questions and concerns before any construction is approved or started.

Lastly, and I ask you: If the people of Nondalton disapprove of the road project, what is the process and procedures to make sure that this project isn't "cramped down our throats"? **Is there any recourse that the residents of Nondalton have to "Appeal" this process if they disapprove of it? How and when would they be notified?**

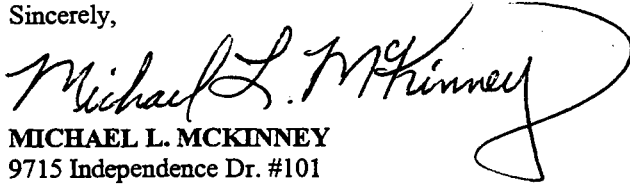
Again, I urge you to please don't waste money and cause a lot of misery by building a road/bridge from Nondalton to Iliamna that is not wanted or needed. When roads, mines, commercial fishing, and clear-cut logging happens we loose a part of our Native way of life on the Land we Love. The land will never be the same. Having wilderness areas is what makes Alaska, "ALASKA"! When we in Alaska destroy our land by shipping our natural resources "outside", and then have none left like Third World Countries; we make the land so that NO ONE will want to live here.

And to the people of Nondalton who may be reading this, **DON'T assume that your costs of having food, fuel, and supplies flown in will go down just because this bridge is built.** There's nothing saying a business owner has to lower his prices just because it's flown to Iliamna's larger airport and there's a road for you to ride down in comfort! I encourage all residents of Nondalton to really think for yourself, your

family, your future, and not let others think for you. Get involved and TAKE AN INTEREST IN YOUR INTERESTS!

Thank you for your time and for allowing me the right to express these views and concerns.

Sincerely,

A handwritten signature in black ink that reads "Michael L. McKinney". The signature is written in a cursive style with a large, sweeping flourish at the end.

MICHAEL L. MCKINNEY
9715 Independence Dr. #101
Anchorage, Alaska 99507

Resident/Nonresident Hire

by Jeff Hadland
Economist

**Resident hire continues to make small gains;
one/fifth of workforce remains nonresident**

The Alaska Department of Labor and Workforce Development (AKDOL) prepares a report each year on resident hire in Alaska. The department also tracks resident hire by employer in several major industry sectors each quarter. This information is collected in order to fulfill legislative requirements, assess the success of resident hire efforts, identify occupations that are eligible for resident hire preference on publicly funded construction projects, and identify opportunities for training program providers and job seekers.

The impact of nonresidents in the workforce

Workers spend most of their earnings where they live. Nonresidents take a major portion of their earnings to their home state, depriving Alaska of the full economic benefits of the employment created in the Alaska economy. One dollar in nine paid in wages in 1998 went to nonresidents. This loss has a direct impact on the total growth rate and income of Alaska, resulting in smaller indirect income and employment than would occur if workers lived in Alaska. Job seeking Alaskans are affected when nonresidents fill positions for which they are available and qualified. Nonresidents also claim benefits from Alaska's Unemployment Insurance fund.

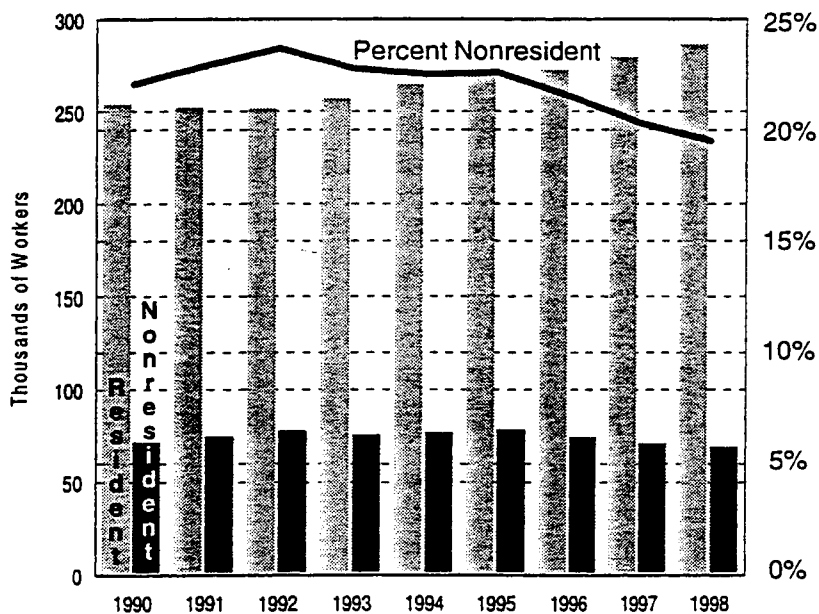
Many employers recruit and hire out-of-state as a matter of convenience or on the assumption that qualified Alaskans are not available. While there are jobs and times where this is true, many jobs which could be filled by qualified Alaskans do go to nonresidents.

Resident hire efforts

To the greatest extent possible, the department's goal is to see that Alaskans are trained and qualified for, and have first chance at, the available job opportunities. AKDOL is involved in a number of initiatives that address these objectives.

Promoting Alaska hire in the oil industry has long been a priority. The recent BP and ARCO merger agreement with the State of Alaska contains

1 Resident and Nonresident Workers Alaska 1990-1998



Source: Alaska Department of Labor and Workforce Development, Research and Analysis Section

Resident and Nonresident Workers Alaska 1997-1998 2

commitments for the hiring of Alaska residents in this high paying industry. Enabling legislation for the Northstar project requires detailed reporting of residency data by all contractors.

The seafood processing industry employs a large seasonal work force of mostly nonresident workers at relatively low pay. Since 1995, Governor Knowles has asked major employers to work with AKDOL's Seafood Unit to put more Alaskans, especially rural residents, to work in the state's largest industry. In 1998, offshore processors did hire more Alaskans than in the past; however, most offshore processor employment is counted in Washington state.

	1997 Resident Workers	1998 Resident Workers	Percent Change 1997- 1998	1997 Non- resident Workers	1998 Non- resident Workers	Percent Change 1997- 1998
Ag/Forestry/Fishing	1,900	1,861	-2.1	1,126	722	-35.9
Mining	9,721	10,399	7.0	3,795	3,686	-2.9
Construction	18,777	19,179	2.1	4,816	4,584	-4.8
Manufacturing	13,359	12,783	-4.3	19,849	18,161	-8.5
Trans/Comm/Util	25,930	26,769	3.2	5,174	5,631	8.8
Wholesale Trade	9,624	9,822	2.1	1,793	1,811	1.0
Retail Trade	56,267	57,557	2.3	13,755	13,501	-1.8
Finance/Ins/Real Estate	12,948	13,370	3.3	1,483	1,417	-4.5
Services	69,911	72,893	4.3	15,664	16,215	3.5
Nonclassifiable	174	384	154.0	203	177	-10.3
Total Private Sector	218,611	225,075	3.0	67,658	65,910	-2.6
Local Government	39,280	39,653	0.9	2,447	2,462	0.6
State Government	21,920	21,979	0.3	1,128	1,179	4.5
Total	279,811	286,707	2.5	71,233	69,551	-2.4

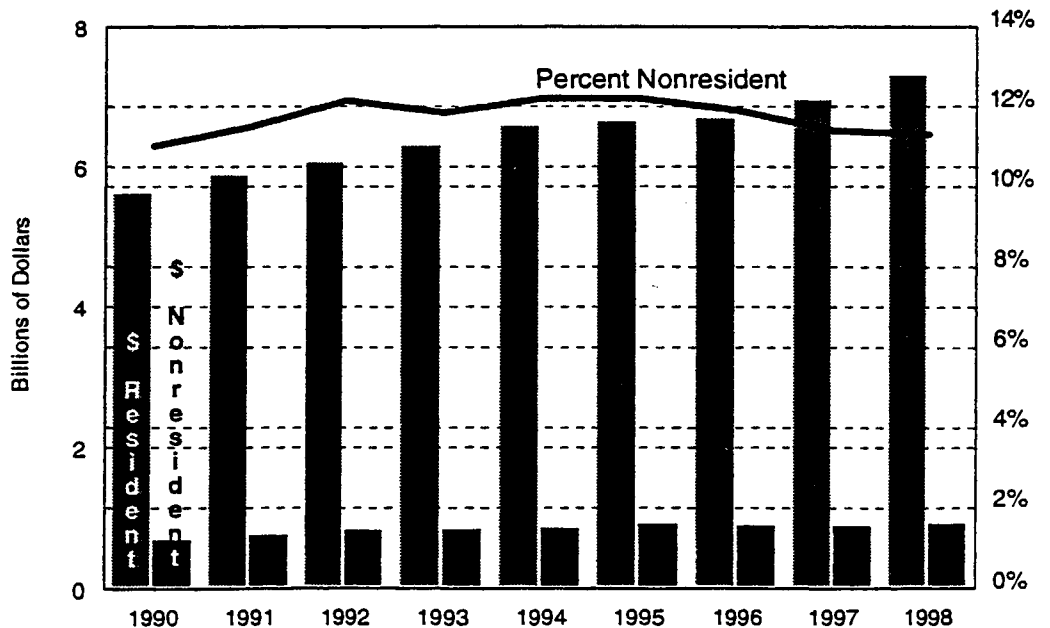
Source: Alaska Department of Labor and Workforce Development, Research and Analysis Section

Welfare reform has created demand for entry level positions for those making the transition out of welfare. State agencies, non-profit welfare reform contractors, and cooperating employers have helped move welfare recipients into many of the occupations and industries with high levels of nonresident hire.

One of the priorities of the State Training and Employment Program (STEP) is training Alaskans in occupations with high non-resident hire. In the past 10 years, STEP has provided training to more than 11,000 workers.

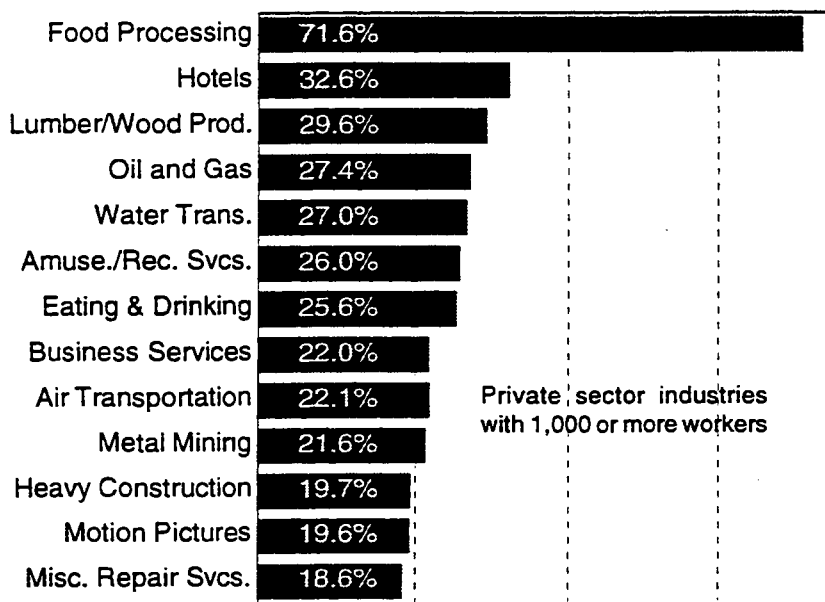
In the construction industry, publicly funded projects are

Resident and Nonresident Wages Alaska 1990-1998 3



Source: Alaska Department of Labor and Workforce Development, Research and Analysis Section

4 Industries with High Rates of nonresident workers—1998



Source: Alaska Department of Labor and Workforce Development, Research and Analysis Section

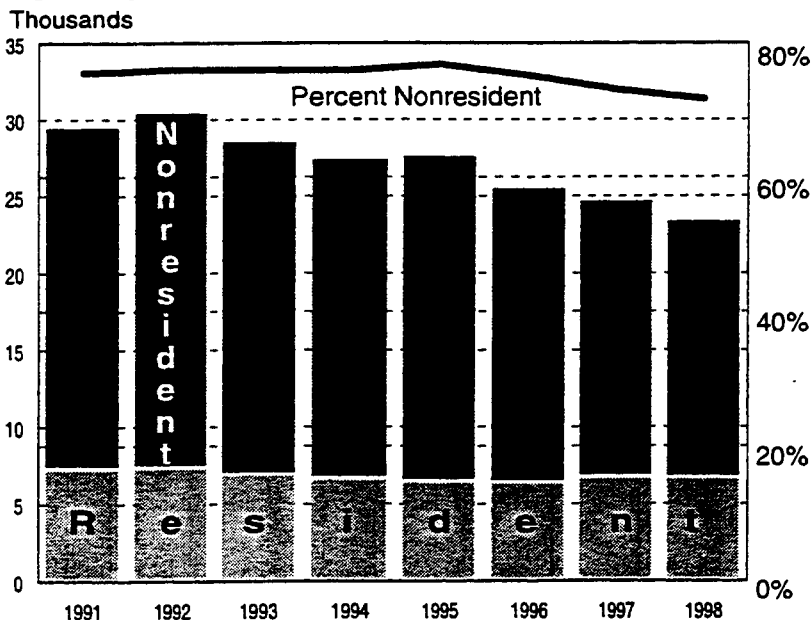
required to hire 90 percent resident workers in 18 occupations, including carpenters, laborers, equipment operators, plumbers and pipe fitters, electricians, painters, and welders. This regulation is currently enforced by AKDOL.¹

Current status of resident hire in Alaska

In 1998, Alaska continued to show improvement in resident hire. Alaska employed more resident workers and reduced the relative share of nonresident workers in its economy. More than 80 percent of all workers employed in Alaska in 1998 were residents.

Nonresident workers made up 19.5% of all workers in 1998. In 1997, nonresidents were 20.3% of the work force; in 1996 21.5%, and in 1995 22.6%. There has been a drop of three percentage points since 1995, and a long decline from the peak percent nonresident hire year of 1992 when 78,000 nonresidents were employed, nearly 24 percent of all workers. 1998 saw the lowest number and percent nonresident workers since 1988.

5 Food Processing Dominated by nonresident workers



A total of 69,551 nonresident wage and salary workers were employed in 1998. This was 2.4%, or 1,682 fewer nonresident workers than in 1997. The improvement resulted from fewer in-migrants competing with residents for jobs, more year-around jobs, and the success of training programs in placement of workers. Moderate growth in Alaska allowed recently trained resident workers to fill more of the jobs in 1998.

Total wage and salary earnings in private sector, state and local government jobs totaled \$8.23 billion in 1998. Nonresidents earned about 11.3% of the total (or \$929.6 million), a slight percentage decline from 1997. Earnings for both nonresidents and residents increased from the previous year. Nonresident earnings increased by 3.9% or \$35

Source: Alaska Department of Labor and Workforce Development, Research and Analysis Section

¹ A challenge to the constitutionality of the regulation is now before the Alaska Superior Court.

million (\$29.3 million of this increase centered in the oil industry). Resident earnings increased faster, with an overall growth of more than five percent or \$353 million.

The presence of nonresident workers varies widely by industry. Nonresident workers in Alaska are typically found in industries with a large number of seasonal jobs (often relatively low paying), industries with faster than average growth, industries with jobs requiring special skills, and industries where the workers may be employed in remote work sites or camps. Alaska's seasonal industries continued to dominate the list of those with the most nonresident earnings and workers. Seafood processing, hotels, lumber and wood products, and the oil industry were the major industry sectors with the highest percentage of nonresident workers in 1998.

Food processing employs large bloc of nonresidents

The food processing industry continued to employ the highest percentage of nonresidents, 71.6% in 1998. However, continued AKDOL Alaska recruitment efforts, available Alaska workers, and an overall decline in the number of workers contributed to a 1.4% decline since 1997. Nearly 66.5% of wages in this sector went to nonresidents.

Total earnings in food processing increased by \$4.4 million and the total number of workers declined by 1,310. The number of nonresident workers decreased by 1,268 workers or 7.0% while resident workers decreased by only 42 workers between 1997 and 1998. Resident earnings increased by 4.3% or about \$3.9 million and nonresident earnings increased by only \$500,000. The food processing industry is relatively low paying, with nonresident workers earning on average \$4,066 in each quarter that they worked in 1998, an increase of \$260 from 1997.

Occupations with Many Nonresident workers and earnings above median **5**

1998 private sector, above \$7,500/qr

Occupation	Nonresident Workers	Average Earnings per Quarter
Airplane Pilots and Navigators	822	\$16,538
Registered Nurses	620	9,678
Management Related Occupations	488	9,266
Electricians	369	11,335
Plumbers, Pipefitters	369	11,153
Operating Engineers	320	12,644
Welders and Cutters	310	11,383
General Managers & Other Top Executives	286	16,543
Truck Drivers, Heavy	265	9,233
Automobile Mechanics	249	8,768
Dispatchers	247	21,183
Ship Captains & Mates	240	10,865
Extractive Occupations	238	13,871
Heavy Equipment Mechanics	234	12,118
Petroleum Technologists & Technicians	223	21,560
Supervisor, Sales, Retail	203	8,353
Misc. Plant or Systems Operators	173	22,602
Mechanics and Repairers	173	8,415
Construction Trades, not elsewhere classified	161	8,063
Officials and Administrators	159	13,819
Machinery Maintenance Occupations	155	11,613
Manager, Administrative Services	148	10,813
Misc. Material Moving Equipment Operators	142	12,579
Excavating and Loading Machine Operators	141	10,383
Truck Drivers, Tractor-Trailer	140	9,611
Engineers, Other	139	18,565
Inspectors and Compliance Officers	139	13,013
Salespersons; Motor Vehicles	139	9,241
Petroleum Engineers	135	25,172
Supervisors; Overall Construction	132	16,903

Source: Alaska Department of Labor and Workforce Development, Research and Analysis Section

Oil industry adds resident workers

Alaska's oil industry increased its Alaska work force in 1998 from a low point in 1997. More resident workers were hired during a temporary upswing in activity, decreasing the percent nonresident workers from 29 percent in 1997 to 27.4% in 1998. However, total nonresident earnings increased from 1997 to 1998 with 26.4% of earnings going to nonresidents.

Changes to the number of nonresidents in the oil industry have been relatively small during the 1990s. The percent has fluctuated as the number of resident workers has increased or decreased. (See Exhibit 6).

Oilfield service companies showed continuing

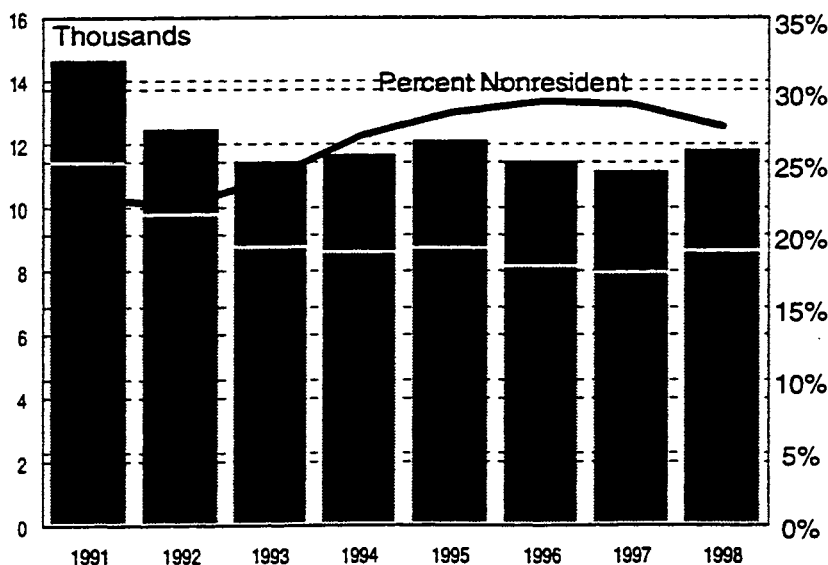
improvement in their resident hire numbers. The percent nonresident workers dropped to 27.8% in 1998 from 30 percent in 1997. Major oil companies showed flat employment numbers and no improvement in resident hire performance over 1997; 26.3% of workers were nonresident in 1998.

The earnings differential in favor of nonresidents in the oil industry increased in 1998. Earnings paid to nonresidents in 1998 were approximately \$193 million, 26.4% of the total. Major oil companies, on average, paid out 27.3% of their earnings to nonresidents while oilfield service companies paid 25.7% of earnings to nonresidents. In 1998 the oil industry paid residents an average of \$16,926 per quarter worked while paying nonresidents \$19,085 per quarter. In 1997, nonresidents were paid only \$597 more per quarter than residents.

1998 shows improvement over 1997 across most industry sectors

From 1997 to 1998 the total number of residents working in Alaska increased while the number of nonresident workers declined. The direction of employment change for nonresidents between 1997 and 1998 varied by industry, with most industry sectors showing a decline in the number of nonresident workers. Agriculture, forestry and fishing showed a 35.9% drop in nonresident workers. The manufacturing industry had the next largest private sector percentage drop in nonresident workers, an 8.5% decline or a loss of 1,688 workers (1,310 workers in food and kindred products). The private sector as a whole showed 2.6% fewer nonresident workers. The transportation industry had the largest increase in nonresident workers, associated with rapid growth in the air transportation sector.

6 Oil Industry Nonresident Numbers and percents 1991-1998



Source: Alaska Department of Labor and Workforce Development, Research and Analysis Section

High paying occupations with large numbers of nonresidents

Nonresident workers are found in large numbers in a wide variety of occupations; in particular, seafood processing occupations, retail sales, eating and drinking occupations, general office occupations and construction occupations. Many occupations with large numbers of nonresident workers have relatively high pay and, although they may require significant training or education, represent an opportunity for training programs in Alaska or a career path for unemployed Alaskans. Exhibit 5 shows occupations with large numbers of nonresidents and 1998 quarterly earnings in excess of \$7,500, the median quarterly earnings.

Alaska firms hiring the largest numbers of nonresidents

Exhibit 8 shows the top five employers by industry, sorted by the total number of nonresident workers they employed. The percentage and the total number of nonresidents should be examined together.

Geographic distribution of local residents, Alaska residents and nonresidents

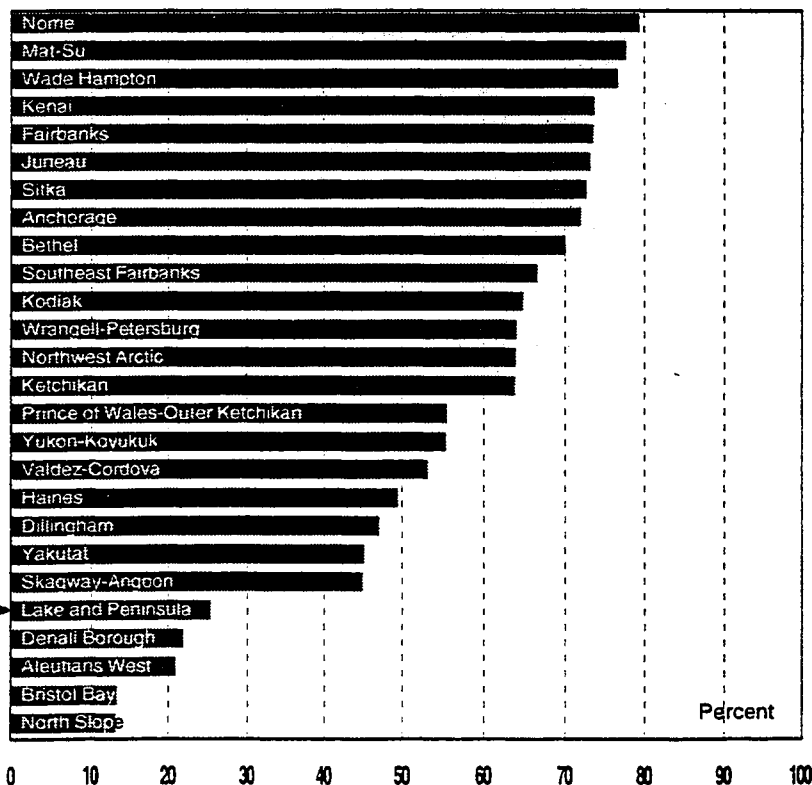
The North Slope Borough, with its many rotating oil workers, has the lowest percent of local resident workers. (See Exhibits 7 and 9.) Other areas with low percents of local resident workers include those with large seasonal seafood processing industries. Rural areas with relatively few job opportunities have the highest level of local resident employment.

In Exhibit 9, the percent nonresident workers by area is displayed for Alaska's private sector. The highest percent nonresident workers are found

in the Southwest Region, primarily the Aleutians East and the Bristol Bay Boroughs, and Aleutians West and Lake and Peninsula census areas. Most of these workers were engaged in seafood processing. Other areas with a high percentage of nonresident workers include Yakutat, Skagway/Angoon, Denali Borough and Kodiak.

For further information about resident hire in Alaska see Nonresidents Working in Alaska—1998 at <http://www.labor.state.ak.us/research/research/emp.htm>

Local Residents' Percent of total workers—private sector 1998



Source: Alaska Department of Labor and Workforce Development, Research and Analysis Section

8 Top Employers of Nonresidents By industry—1998

	Resident Workers	Nonresident Workers	Percent Nonresident
Mining			
Alaska Petroleum Contractors Inc.	1,592	676	29.8%
BP Exploration Alaska Inc.	766	489	38.9
ARCO Alaska, Inc.	1,290	297	18.7
Peak Oilfield Services Co.	938	267	22.1
VECO Operations Inc.	606	266	30.5
Construction			
Houston Contracting Co. AK Ltd.	625	132	17.4
Conam Construction Co.	236	127	34.9
Udelhoven Oilfield System Svc.	200	78	28.0
H.C. Price Co.	459	69	13.0
Wolverine Supply, Inc.	463	68	12.8
Manufacturing			
Trident Seafoods Corp.	257	3101	92.3
Wards Cove Packing Co., Inc.	630	1671	72.6
Unisea, Inc.	396	1312	76.8
Icicle Seafoods Inc.	517	1259	70.8
Peter Pan Seafoods Inc.	304	1120	78.6
Transportation/Comm/Utilities			
Dynair Service, Inc.	492	394	44.4
Northwest Airlines, Inc.	187	283	60.2
Westours Motorcoaches Inc.	555	243	30.4
Federal Express Corp.	1,005	240	19.2
Alaska Airlines, Inc.	1,833	224	10.8
Wholesale Trade			
Baker Hughes Oilfield Operations	84	90	51.7
Officemax	195	60	23.5
Dresser Industries Inc.	165	50	23.2
Western Pioneer, Inc.	245	36	12.8
Anchorage Cold Storage	483	33	6.0
Retail Trade			
Aramark Leisure Services Group, Inc.	304	963	76.0
Carr Gottstein Foods Co.	4,942	573	10.3
KMart Corp.	1,784	494	21.6
Fred Meyer Shopping Centers	3,177	474	12.9
Wal-Mart Associates, Inc.	2,377	452	15.9
Finance/Insurance/Real Estate			
Alaska USA Federal Credit Union	1,016	140	12.1
National Bank of Alaska	1,524	88	5.4
Cusack Development, Inc.	271	78	22.3
First National Bank of Anchorage	967	74	7.1
Keybank National Association	304	42	12.1
Services			
Providence Hospital	3,420	456	11.7
Alaska Hotel Properties, Inc.	557	400	41.8
Westmark Hotels, Inc.	927	331	26.3
Labor Ready, Inc.	562	269	32.3
Ogden Facility Management of AK	976	211	17.7

Source: Alaska Department of Labor and Workforce Development,
Research and Analysis Section

Methodology—How is the number of nonresident workers estimated?

Alaska residency is determined by matching the Alaska Department of Revenue Permanent Fund Dividend (PFD) file with the Alaska Department of Labor and Workforce Development wage file. The PFD file lists Alaskans who either applied for or received a PFD. The wage file contains quarterly earnings and industry information on workers covered by unemployment insurance within Alaska. Workers in the wage file are considered Alaska residents if they either received a 1998 PFD or applied for a 1999 PFD.

For the purposes of this analysis, Alaska residency is determined by matching the worker's social security number on the wage file with the social security number on the PFD file. Those few with missing social security numbers are excluded from the analysis.

Information from both the 1998 and 1999 dividend years is used to improve the accuracy of the residency classification. Resident workers who left Alaska during 1998 are identified and counted as residents. New workers who arrived in Alaska after January 1, 1998, would generally be counted as nonresidents.

Workers and Earnings by Place of Work and Residency

Private sector wage and salary workers 1998

9

	Resident Workers		Nonresident Workers		Resident Wages		Nonresident Wages	
	Local Resident	Other Alaska Res.	Number	Pct. Non-Res.	Local Resident	Other AK Resident	\$Amount	Pct. Non-Res.
Anchorage/Mat-Su Reg.								
Anchorage	90,413	13,024	21,373	17.1%	\$2,332,735,819	\$290,788,427	\$295,357,466	10.1%
Mat-Su	10,301	1,356	1,534	11.6	177,896,197	29,446,142	10,741,730	4.9
Gulf Coast Region								
Kenai	14,168	1,407	3,555	18.6	291,823,037	29,436,043	26,480,683	7.6
Kodiak	4,453	460	1,927	28.2	87,465,108	8,219,997	17,431,850	15.4
Valdez-Cordova	3,206	943	1,846	30.8	88,702,298	24,050,427	21,506,396	16.0
Interior Region								
Denali Borough	492	837	884	39.9	17,236,325	17,838,882	7,136,282	16.9
Fairbanks	24,062	2,775	5,666	17.4	550,314,163	54,105,330	51,930,948	7.9
Southeast Fairbanks	1,076	227	305	19.0	14,701,061	4,366,014	2,321,673	10.9
Yukon-Koyukuk	1,190	532	415	19.4	16,266,738	15,853,016	5,590,789	14.8
Northern Region								
Nome	2,403	304	307	10.2	47,877,207	6,737,580	3,830,520	6.6
North Slope Borough	1,592	6,904	3,308	28.0	50,863,536	374,210,275	166,627,409	28.2
Northwest Arctic Borough	1,776	612	377	13.6	43,472,487	28,218,954	14,108,068	16.4
Southeast Region								
Haines	764	139	630	41.1	10,394,093	2,259,837	5,024,755	28.4
Juneau	9,178	1,010	2,289	18.3	205,755,070	18,318,968	23,572,116	9.5
Ketchikan	5,200	507	2,410	29.7	120,096,410	8,076,002	23,886,204	15.7
POW-Outer Ketchikan	1,583	477	777	27.4	29,914,778	11,206,426	9,175,934	18.2
Sitka	2,782	264	761	20.0	55,249,628	3,260,650	6,585,304	10.1
Skagway-Angoon	898	283	795	40.2	14,748,456	4,022,258	7,257,083	27.9
Wrangell-Petersburg	1,865	231	805	27.7	30,145,409	3,784,736	7,319,114	17.7
Yakutat	236	76	206	39.8	3,606,080	1,110,985	2,380,097	33.5
Southwest Region								
Aleutians East	411	439	2,564	75.1	7,647,331	8,798,118	27,843,026	62.9
Aleutians West	1,255	692	3,975	67.1	33,269,118	18,389,754	42,724,456	45.3
Bethel	4,208	945	827	13.8	56,331,086	17,324,846	9,455,084	11.4
Bristol Bay Borough	430	487	2,239	70.9	9,599,477	5,648,842	13,991,492	47.9
Dillingham	1,276	422	990	36.8	26,842,927	7,126,224	7,508,278	18.1
Lake and Peninsula	309	222	671	55.8	2,800,980	3,235,448	4,986,954	45.2
Wade Hampton	1,038	200	109	8.1	10,142,940	4,622,898	899,877	5.7
Other/Unknown	0	437	2,990	87.2	0	9,027,405	28,282,530	75.8
Total Private Sector	186,565	36,212	64,353	22.5	4,335,897,758	1,009,484,484	843,956,118	13.6

Note: Place of Alaska residence determined by most recent Permanent Fund Dividend address. Place of work is determined from data provided by 90 percent of employers on quarterly UI wage records or from employer primary business location.

Source: Alaska Department of Labor and Workforce Development, Research and Analysis Section

Alaska Department of Community and Economic Development

	<p>Alaska Community Database Detailed Query Results</p>
---	--



Nondalton

For Photos of Nondalton click [here](#)

Economy, Employment, Income and Poverty

General Description of the Local Economy -----

Fishing in Bristol Bay is an important source of income in Nondalton. 17 residents hold commercial fishing permits. Gold and copper are mined in the area. One source of summer employment is firefighting. Unemployment is high. The City is interested in developing a museum and gift shop. The community relies heavily on subsistence hunting and fishing. Many families travel to fish camp each summer. Salmon, trout, grayling, moose, caribou, bear, dall sheep, rabbit and porcupine are utilized.

The following Income and Employment data is from the **1990 U.S. Census**.
This is the only available source of detailed community-level information available on a statewide basis.

Nondalton is located in the Lake & Peninsula Census Area.
The figures are estimates, subject to sample variability.
The percent of all households sampled in Nondalton was: 47.7%.
Note: Current socio-economic measures could differ significantly.

Household Income and Community Poverty Levels -----

Families with Household Income:

Less than \$10,000:	8	\$60,000 - \$74,999:	0
\$10,000 - \$19,999:	6	\$75,000 - \$99,999:	2
\$20,000 - \$29,999:	7	\$100,000 - \$125,000:	0
\$30,000 - \$39,999:	9	\$125,000 - \$149,000:	0

\$40,000 - \$49,999: 2 Over \$150,000: 2
 \$50,000 - \$59,999: 4

Median Household Income: \$ 21,750 Percent below Poverty: 20.3%
 Median Family Income: \$ 28,750 Persons in Poverty: 35

Employment -----

Total Potential Workers (16+):	130	Private Sector:	15
Total Employment:	39	Self Employed:	2
Armed Forces Employment:	0	Local Government:	16
Unemployed (And Seeking Work):	29	State Government:	8
→ Percent Unemployed:	42.6%	Federal Government:	0
Adults Not in Labor Force:	62		
% Adults Not in Labor Force:	70.0%		

Employment by Occupation and Industry -----

<u>OCCUPATION</u>		<u>INDUSTRY</u>	
Executive/Administrator:	4	Forestry/Fishing/Farming:	0
Professional Specialty:	11	Mining:	0
Technician:	2	Construction:	5
Sales:	0	Non-Dur. Manufacturing:	0
Administrative Support:	2	Durable Manufacturing:	2
Private Household:	0	Transportation:	2
Protective Service:	0	Communications/Utilities:	0
Other Professional Service:	10	Wholesale Trade:	0
Forestry/Fishing/Farming:	2	Retail Trade:	3
Precision Craft or Repair:	5	Fin./Insur./Real Estate:	0
Machine Operators:	0	Business & Repair Service:	0
Transportation or Materials:	0	Personal Services:	0
Handler/Equipment/Labor:	3	Entertainment/Recreation:	0
		Health Services:	0
		Education Services:	22
		Public Admin.:	2
		Other Prof. Services:	3

[Back to Detailed Information Query Page](#)

[Back to Query Options Page](#)

Department of Community & Economic Development
 Research & Analysis Section
 Phone: 907-465-4750 Fax: (907) 465-5085
 e-mail: Michael_Cushing@dced.state.ak.us

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN AND ENVIRONMENTAL

TONY KNOWLES, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
(FAX) 243-6927 - TDD 269-0473
(907) 269-0528 or (907) 269-0542

October 27, 2000

Mr. Michael L. McKinney
9715 Independence Dr., #101
Anchorage, AK 99507

Dear Mr. McKinney:

The Alaska Department of Transportation & Public Facilities (ADOT&PF) received your letters dated February 2, 2000 and March 7, 2000 regarding the Environmental Assessment for Iliamna-Nondalton Road Project (No. 51951) and we would like to take this opportunity to thank you for your comments. Your comments will be part of the official administrative record and will be addressed in the final National Environmental Policy Act (NEPA) document. A copy of that document will be sent to you upon completion.

If you have any further questions please do not hesitate to call me at 269-0572.

Sincerely,



John Dickenson, P.E.
Design Project Manager

cc: Lawrence (Lance) P. Hanf, Agency Counsel, FHWA
Tim Haugh, Environmental/Right of Way Specialist, FHWA
Jack Melton, Area Planner, ADOT&PF
Jerry O. Ruehle, Regional Environmental Coordinator, ADOT&PF

DOT Responses:

1. After the February/March 2000 public hearings in Iliamna, Nondalton and Anchorage, the Alaska Department of Transportation & Public Facilities (ADOT&PF) contacted the Alaska State Department of Health and Social Services, Division of Alcohol and Drug Abuse, Associate Coordinator, George Kirchner who stated he "does not believe the road would have any difference on what drugs or alcohol are brought in to Nondalton." The EA identifies a need for a hospital in Iliamna and an elders home in Nondalton, based on views expressed by the local communities during the planning stage of this proposal, and the work done to date by the Nilavena Tribal, Inc. The EA does not claim that the proposed project would improve health care or increase the likelihood of the establishment of these facilities. Rather, the document correctly states that improved overland access would enhance the opportunity for joint regional development and permit facilities of this type and others to provide more centralized services to all the residents of Iliamna/Newhalen and Nondalton,

Regardless, all indications are that no significant change in the number of people injured or disabled would result from the proposed project. People currently travel back and forth between Iliamna and Nondalton on snowmachines and four-wheelers. It is expected that the winter travel vehicle use will move away from snowmachines and four-wheelers use toward the use of cars or trucks.

2. ADOT&PF has no plans to provide funding "to combat the use of alcohol, drugs and "pot" in Nondalton and surrounding villages." It is believed that this project would not cause a significant change in these social problems. For some residents access to alcohol will be increased, however, it is not expected to cause a significant increase in usage. The need for the area's communities to address alcohol-related issues will continue, with or without a road connection.
3. The proposed project is not expected to attract a significant number of non-residents. The SCIS states "People who live outside the study area may see the area as an attractive recreational property, but would be limited by the lack of direct access and the expense involved.
4. The Lake and Peninsula Borough and local villages have indicated a willingness to maintain the road and bridge, if the State constructs it. A formal maintenance agreement with the Borough and local government will be developed before road construction.
5. At this time there is no plan to pave the road. The construction contract will be awarded using the competitive bidding requirements of 23 CFR Parts 633 & 635. An Alaskan preference is not allowed for federal work.

6. There is no guarantee that there will be any "local hire." The Contractor that is awarded the contract can elect to hire local residents if he or she desires. Pursuant to 49 CFR Part 26 and 23 CFR Parts 230 and 635 Subpart A, the Contractor will be required to meet certain Disadvantaged Business Enterprise (DBE) goals as that program is applied in the State of Alaska generally and this project specifically. This is a requirement for all federal funded projects. The DBE goal percentage varies from project to project depending on the proportion of work that is feasible to be subcontracted. At this time there is no assurance that qualified DBE subcontractors are in business in the local area.
7. The L&PB has no plan to use de-icing chemicals on this road. To address your concern about hazardous waste during construction, the Contractor for the project will be required to comply with all state and federal regulations and our construction contract requires the Contractor to submit a Hazardous Material Control Plan to the Department for approval prior to beginning construction.
8. No specific studies have been done to determine what effects the proposed project may have on caribou migration. However, ADF&G believes based on experiences from other locations in the State, the proposed project would not have a significant adverse impact on herd migration. The large Mulchatna herd ranges over a large area with movement very unpredictable. There is a potential for increases in caribou/vehicle collisions due to the potential for increased speeds, but due to the low volume of vehicles expected on the road this is not singularly or cumulatively expected to result in significant impacts to the caribou herd.
9. ADOT&PF has no near or long-term plans to build roads that would connect Iliamna/Newhalen to Anchorage. The purpose of this project is to provide a safe overland route between Iliamna/Newhalen and Nondalton. Its construction is independent of the Cominco Mine project. At the present time this Department has no plans to improve access between Iliamna and Port Alsworth. The Southwest Area Plan, currently being developed, does identify major missing road links between Williamsport and Pile Bay, and from Iliamna to Pedro Bay, and on to Pile Bay. Final recommendations however have not been made.
10. No, the State of Alaska has no ongoing study or plan to build a road from the Pebble Copper Mine.

With regard to your question if a study was done to measure the economic impact on the residents of Nondalton and the surrounding towns if the bridge is built, no study was done.
11. The Kijik Corporation, the major native corporation landowner that would potentially be harmed by trespass, strongly supports the project. Large increases in trespass, crime and poaching are not expected; however, if such a problem does occur, the State Troopers, the Kijik Corporation, and/or the Alaska Department of

Fish & Game would have to consider what action is necessary to remedy the problem.

12. The navigable channel vertical clearance for span 2 near the Iliamna side of the bridge will be approximately 14.27 feet. The horizontal clearance will be approximately 115.62 feet. Navigation beneath the bridge should not be a problem. A U.S. Coast Guard Section 9 Bridge Permit will be obtained for the structure after all other regulatory permits are obtained.
13. The Revised EA has been reviewed and approved by FHWA. They have determined the proposed action will not result in significant impacts and have issued a Finding of No Significant Impact (FONSI). A Notice of Availability of the FONSI will be published in The Anchorage Daily News, Bristol Bay Times and Alaska Administrative Journal. In addition a copy of the FONSI will be mailed to those that commented on the EA. The public and any other interested parties are encouraged to contact ADOT&PF's Project Manager with their comments on this project.

WRITTEN PUBLIC HEARING COMMENTS

MAR - 2 '00

For your convenience and to ensure that your comments become part of the formal record we have provided this sheet. If the space is not sufficient, feel free to include additional sheets.

Iliamna-Nondalton Road Improvements
Project No. 51951

Project Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr. JD	✓	
Env. Coord.	1	
Env. Team Leader	✓	
Staff		
Hydrologist		
Project File		2
Central File	✓	

NAME: Nancy Delkittie

ADDRESS: P.O. Box 008

COMMENTS (Please Print)

I feel its important to have the bridge and road completed from Iliamna to Nondalton. On April 3, 1998 my nine-year old daughter was in an A.T.V accident at 7:30 pm. Due to the weather and airport conditions we weren't able to get her into Anchorage until 2:00 am. She had facial and head injuries. If the road and bridge had been completed the health team would have been able to transport her to Iliamna with the ambulance. Other reasons to complete the road and bridge, more economic opportunities such as tourism and small businesses, social interactions between communities. There would be less vehicle accidents on the Ice between the communities. Hopefully our mail services will increase to five days a week.

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

WRITTEN PUBLIC HEARING COMMENTS

MAR - 2 '00

For your convenience and to ensure that your comments become part of the formal record we have provided this sheet. If the space is not sufficient, feel free to include additional sheets.

**Iliamna-Nondalton Road Improvements
Project No. 51951**

Prefim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr.		
Env. Coord.		
Env. Team Leader		
Staff		
Hydrologist		
Project File		
Central File		

NAME: Elizabeth Balluta

ADDRESS: P.O. Box 108

COMMENTS (Please Print)

I am for the road & bridge, I won't want my grand children have to put a Honda in a boat & go across the river. When we go across the river in the fall, it's quite dangerous, there was a truck that went thru earlier this fall, it was in the water for more than 4 or 5 days before anyone can get it out, luckily for the two people that had jumped out & was safe. There over flow & shell ice later on as we travel later on in the winter, which is dangerous, you can either get stuck or go to fast with a Honda or a snow-machine & tip over cause of the shell ice. There were times that we need to get our furniture, or what ever to Nondalton & the air taxi charges to much or even when we hire some one from Iliamna or Newhalen to take it to Landing they also charge to much. There were times we needed propane & gas, again we hiled it with a Honda. For Newhalen carnival the puddles were almost up to the seat. I won't want to worry if my child went down ~~in the water~~ ^{for a dance} or a well gone if that bridge was is, I know there will always be people going to and from to pick him up if he did break down. Also there has been people who attempted to walk, they

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

also can be picked up with the traffic when the bridge get in.

D-63

By a long run to the bridge will benefit lots of people in the area with relatives & friends.

RECEIVED

MAR - 2 '00

Brenda Trefon
101 Hill St.
Nondalton, AK 99640

Jerry O. Ruekle
Environmental Coordinator
AK Dept. Of Transportation & Public Facilities
P.O. Box 196900
Anchorage, AK 99519-6900

2-29-00

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr.		
Env. Coord.		
Env. Team Leader		
Staff		
Hydrologist		
Project File		
Central File		

Re: Iliamna - Nondalton Road Improvement Project

Dear Mr. Ruekle,

I am a resident and home-owner in Nondalton, Alaska. I request that this letter be included in the records regarding the proposed Iliamna - Nondalton Road Improvement Project, for the road/bridge project No. STP-0214(3)/51951.

There are comments being recorded for this proposed project from people who are not even residents of Nondalton, Iliamna, or Newhalen. One such letter addresses many negative issues such as increased drug use in our village if the bridge goes in.

I am not a drug user and there are many other residents of this village who are also concerned citizens, trying to raise families here. There are many other more important issues to look at about this bridge, than to cloud the scene with negative stereotypes and cheap shots at the people who live here. People who are not residents here do not have a right to decide what is best for the communities which are affected by this bridge project. There are still mixed feelings about the bridge and it would be a serious change for our village, and this affects our lives. We are the ones the Department of transportation should be listening to.

Although I am not sure I want a bridge to our village, I am haunted by the fact that this year alone, two vehicles went through the ice trying to travel to Iliamna. I am the administrator for the Nondalton Tribal Council and I also travel often between these villages for meetings. The ice bridge used for crossing now is always going to be used to transport people and vehicles, and it is an unsafe alternative to a new bridge. And though I do not like the idea of a bridge, I do not want my family traveling on ice any more than they have to.

There may or may not be trespassing where the new highway will go through, but right now the road through fishcamp trespasses over my husband's family Native Allotment and private property.

In closing, I would again like to address the negative assumptions which were made about Nondalton. Like any community, we have some problems, but this community will support it's residents and families as we are very closely related, just as the elders supported their families in

times past. As I write this letter I am sitting with a group of young people who came to use the Native Heritage Library after school. There are seventeen kids here, all drug free. Activities with our kids is only one good reason to cross a bridge to come to Nondalton. We have a good school here, sports events, winter carnival, regional meetings, locally owned businesses, and visiting with friends and family are some of the other reasons why people from Iliamna and Newhalen want to travel across the lake to come to Nondalton.

Sincerely,

Brenda Trefon

Brenda Trefon

WRITTEN PUBLIC HEARING COMMENTS

MAR - 2 '00

For your convenience and to ensure that your comments become part of the formal record we have provided this sheet. If the space is not sufficient, feel free to include additional sheets.

Iliamna-Nondalton Road Improvements
Project No. 51951

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr.		
Env. Coord.		
Env. Team Leader		
Staff		
Hydrologist		
Project File		
Central File		

NAME: Jeremiah Hobson

ADDRESS: PO Box 056 Nondalton, AK 99640

COMMENTS (Please Print)

The proposition on the boat launch is not in my favor. The reason why is that people who uses the boat launch will be trespassing on private lands, which can cause a ruckus to people who owns fishcamps along the river. People in the Iliamna/Newhalen area uses the landing down river to launch their boats, while in Nondalton, people use the beach front of Six-Mile lake to launch their boats, in order to get access to the Newhalen River. I am sure people in Iliamna/ Newhalen would not want to travel the distance ^{in order to} ~~to~~ launch their boats ~~for~~ access to the river. People of Nondalton would feel the same way the residences of Iliamna/Newhalen would feel. They would not travel the distance, since they already have access to their boats along the beach front of six-mile lake, in order to get to the Newhalen River.

1

DOT Response:

- Please see response number 2 on page D-20.

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

WRITTEN PUBLIC HEARING COMMENTS

MAR - 2 '00

For your convenience and to ensure that your comments become part of the formal record we have provided this sheet. If the space is not sufficient, feel free to include additional sheets.

**Iliamna-Nondalton Road Improvements
Project No. 51951**

Person Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr.		
Env. Coord.		
Env. Team Leader		
Staff		
Hydrologist		
Project File		
Central File		

NAME: George ALEXIE

ADDRESS: Box 108 Nondalton, A.K. 99750

COMMENTS (Please Print)

I am in favor of the road and bridge mainly because of the traveling across the lake in the past several years several vehicles has gone thru the ice, several people have drowned going across, this past winter our fuel, heating oil and gasoline has been rationed out to 5 Gallons of heating per day. Several times gas has run out for a day. many people from here had to go to Iliamna to get fuel in bad weather because of runway conditions or bad weather in Iliamna there are 2 fuel companies you can get fuel from. I think the boat ramp should be in Nondalton away from the bridge site because of trespass at the bridge site. ①

meet and tape or staple so that the address March 13, 2000.

DOT Response:

1. Please see response number 2 on page D-20.

WRITTEN PUBLIC HEARING COMMENTS

For your convenience and to ensure that your comments become part of the formal record we have provided this sheet. If the space is not sufficient, feel free to include additional sheets.

**Iliamna-Nondalton Road Improvements
Project No. 51951**

NAME: Diana Armstrong

ADDRESS: PO Box 9 Iliamna AK 99606

COMMENTS (Please Print)

I feel that this can only be a benefit to all communities. Opening up the 3 villages this way can bring economic growth to all villages. Social growth would be easier.

RECEIVED

MAR - 2 '00

Prelim. Design & Environmental Section	DOY	ACTION
PD&E Engr.		
Project Mgr.		
Env. Coord.		
Env. Team Leader		
Staff		
Hydrologist		
Project File		
Central File		

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

MAR - 2 '00

WRITTEN PUBLIC HEARING COMMENTS

For your convenience and to ensure that your comments become part of the formal record we provided this sheet. If the space is not sufficient, feel free to include additional sheets.

Planning, Design & Environmental Section	COPIES	APPROVED
PD&E Engr.		
Project Mgr.		
Env. Coord.		
Env. Team Leader		
Staff		
Hydrologist		
Project File		
Central File		

Iliamna-Nondalton Road Improvements
Project No. 51951

NAME: Lydia K. Wilson

ADDRESS: P.O. Box 5; Nondalton, Ak 99640

COMMENTS (Please Print)

I am a full-time resident and homeowner of the City of Nondalton. I would like to go on record that I fully support the road and bridge project completion. As stated there is more potential damage to the environment without the road and bridge through off-road vehicle usage which will become the only mode of transportation without a road. Our cost of living will also become more manageable with easier access to fuel and a major airport to haul building supplies, food, and other essentials necessary for basic living. We will have opportunity to build and expand businesses related to tourism and the fishing industry. Our area is considered world trophy sport fishing country. Education will also improve with capabilities of shared facilities with our neighbor communities of Newhalen and Iliamna. Sports and extra-curricular activities would also improve greatly as we have historically had limited funds to expand in this area.

One thing I am against is the proposed boat dock and parking lot on the Nondalton side. There are already boat docking sites in Nondalton and at the landings on Newhalen River.

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

Lydia Wilson, Nondalton, Ak
Page Two

The City of Nondalton has already set aside a location for a Small Boat Dock. Also, none from any local communities would use the bridge site because everyone in Nondalton already launch and keep boats in the City proper. Newhalen and Iliamna use the Old Landing on the Newhalen River as it is closer and more convenient to them. This site is already there and because there is an eddy there it is safer.

The site by the bridge is unsafe as a boat docking area as the River is very swift there. The potential for accidental drowning is great especially for people who are inexperienced in this Country. Those are the only ones that would utilize this area if any at all.

I am in support of this project and concur with the finding of no significant impact.

Lydia K. Wilson
PO Box 5
Nondalton, Ak 95640

①
(Cont.)

DOT Response:

1. Please see response number 2 on page D-20.

WRITTEN PUBLIC HEARING COMMENTS

MAR - 2 '00

For your convenience and to ensure that your comments become part of the formal record we have provided this sheet. If the space is not sufficient, feel free to include additional sheets.

Iliamna-Nondalton Road Improvements
Project No. 51951

Prelim. Design & Environmental Section	COPY
PD&E Engr.	
Project Mg.	
Env. Coord.	
Env. Team Leader	
Staff	
Hydrologist	
Project File	
Central File	

NAME: Gary Marttila

ADDRESS: P.O. Box 24 Nondalton, Ak. 99640

COMMENTS (Please Print)

I support the Iliamna-Nondalton road improvement and bridge construction and would like to see it begin as soon as possible for many reasons.

My main concern is for people's safety. Travel over water, ice, by air in extreme weather and over an unimproved, unmaintained road is dangerous.

We can plan and deal with the social and environmental impact of the project but we can't replace a life.

Next, I would like to see our new ^{landfill} ~~dump~~ and incinerator constructed which is waiting on the road on the Nondalton side to be constructed.

Our current dumpsite is uncontrolled, unfenced and was recommended to be closed many years ago by the Public Health Service because of potential health risk and contamination of our water source.

I agree with the positive reasons of the project addressed in the Environmental Assessment but will not ~~to~~ talk about each one here.

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

①

One thing I don't understand about the project is the construction of a boat launch and parking lot. This will only lead to trespass on private lands. There is a boat launch near Elbiamna already so why would anyone trailer a boat this far? Also, I don't know of any Mondalton resident that launches a boat with vehicle and trailer. I think the funds could be more wisely used elsewhere.

I feel that I should mention that I am a new resident of Mondalton although my companion is native to the area.

We intend to remain permanent residents for the rest of our lives. Also, I was recently hired as the Environmental Program Coordinator and I am concerned about the cultural and environmental interests of the people of Mondalton.

DOT Response:

1. Please see response number 2 on page D-20.

WRITTEN PUBLIC HEARING COMMENTS

MAR - 2 00

For your convenience and to ensure that your comments become part of the formal record we provided this sheet. If the space is not sufficient, feel free to include additional sheets.

Native Design & Environmental Section	COPY
PD&E Engr.	
Project Mgr.	
Env. Coord.	
Env. Team Leader	
Staff	
Hydrologist	
Project File	
Central File	

Iliamna-Nondalton Road Improvements
Project No. 51951

NAME: Melvin LeBeau

ADDRESS: PO Box 62 Nondalton, AK 99640

COMMENTS (Please Print)

I am a resident of Nondalton, and have been for the past 14 years. I've spent the last 5 of these years as manager of the Alaska Commercial Company store. I left that position in October of 1999, but my experience there is still germane to my comments.

I have 2 comments in favor of the proposed project and will also address one of the arguments against the bridge that I have had addressed to me as a member of the City Council.

Beginning with a comment on the economic aspect, I know from my AC experience that the cost of goods and groceries retailed in Nondalton is increased by an additional 12% for extra transportation and handling costs over and above getting it to Iliamna.

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

As soon as the road and bridge are in use that additional cost will drop to 4% by transporting goods by the road.

Speaking as a parent of school children, as well as a long-term member of the Local School Advisory Committee, our children could benefit by ~~being~~ receiving more complete educational programs with additional courses being available if a combined Regional High School were possible.

Currently funds are being used to maintain separate and inadequate facilities and no funds are left to provide programs beyond basic education. By combining schools our science classes could look through microscopes instead of reading about experiments in an outdated text book. A combined school made possible by the road and bridge could provide extra curricular programs, like gymnastics, so our children could see that there is more to the world than snowmachines and Nintendo. Maybe our children could be educated for more than becoming a small village resident than not being qualified for anything more. The road and bridge is more than a route to Iliamna. It's a route to the world.

W. L. Lyne

As a member of the city council, I have heard arguments that the road would increase the importation of alcohol and drugs. I feel this is a specious argument since the method of transportation does not limit the quantities imported now, whether it is transported by truck, boat, or snow machine the people that bring it in, bring in the quantity that they choose now, and the road would not increase the market.

In closing, the road would make it a little less expensive to live in rural Alaska and would make transportation to and from Anchorage more reliable and available.

I'll leave it to other supporters to address the vital issues of better medical treatment and the lives to be saved from people not falling through the ice when forced to cross the frozen lake because there's no bridge

W. J. Sullivan

WRITTEN PUBLIC HEARING COMMENTS

RECEIVED

For your convenience and to ensure that your comments become part of the formal record we have provided this sheet. If the space is not sufficient, feel free to include additional sheets.

Iliamna-Nondalton Road Improvements
Project No. 51951

Pretrial Design & Environmental Section		
PD&E Engr.		
Project Mgr.	JD	✓
Env. Coord.	JR	1
Env. Team Leader	SD	✓
Staff		
Hydrologist		
Project File		2
Central File		✓

NAME: Lorene A. Anelon

ADDRESS: Iliamna, AK 99606

COMMENTS (Please Print)

I am in support of the Iliamna Nondalton road. I feel the people that do not live in one of the villages should not have a say or hold up the project any longer. This road is beneficial to all the communities and the other opinions that are negative should not play a part in the state position. The state people should also utilize the local equipment, local people and work closely with the Native Corporation or Village Council before awarding contracts to the outside people. We want our people to have the jobs and improve our economy for the three communities. Thank you for your time & consideration.

Sincerely
Lorene Anelon

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

WRITTEN PUBLIC HEARING COMMENTS

For your convenience and to ensure that your comments become part of the formal record we have provided this sheet. If the space is not sufficient, feel free to include additional sheets.

**Iliamna-Nondalton Road Improvements
Project No. 51951**

NAME: ELIA ANELON
ADDRESS: c/o Box 248 Iliamna AK 99646

COMMENTS (Please Print)

My Name is Elia Anelon I'm in favor of the Road between Iliamna & Nondalton. I think you should pave the roads I've been stuck so many times on the Nondalton Rd and had to spend hours to get out. We have a lot of different activities between the villages and we try to support all the village events and I know it would save the people a lot of money -
Thank you -

RECEIVED

MAR 08 '00

DOT Response:

1. This project will not pave the road. The improvements proposed will improve the roadway and should correct the known "soft spots" and reduce, if not eliminate, the number of vehicles that get stuck.

	COPY	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Design - Project Mgr. JD		<input checked="" type="checkbox"/>
Env. Coord. JR		<input checked="" type="checkbox"/>
Env. Team Leader SK		<input checked="" type="checkbox"/>
Staff		
Hydrologist		
Project File		<input checked="" type="checkbox"/>
Central File		<input checked="" type="checkbox"/>

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple to the back of the envelope that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

MAR 10 '00

Michael L. McKinney

9715 Independence Dr. #101
Anchorage, Alaska 99507

March 7, 2000

Jerry O. Ruekle
Environmental Coordinator
Preliminary Design and Environmental
AK. Dept. of Transportation & Public Facilities
P.O. Box 196900
Anchorage, Alaska 99519-6900

Way DS

Prelim. Design & Environmental Section	COPY	ACTION
PD&E Engr.		
Project Mgr. JD		/
Env. Coord. JR	1	
Env. Team Leader SW		/
Staff S		
Hydrologist		
Project File		2
Central File		/

Re: Iliamna-Nondalton Road Improvements, Project No. STP-0214(3)/51951

Dear Mr. Ruekle:

I would like to add an addendum to my letter that I sent to you earlier as I think it would lend credence to what I wrote, and I request that it be added to the public record for this project. It's also been brought to my attention that a lot of people in Nondalton are upset with me, and are wondering why I would be against a bridge that would make it cheaper, and easier for me to build my retirement home in Nondalton? But first, I'd like to share some personal information, and about my education, and experience:

I'm half Alaskan Native/White, married, 3 boys ages 13, 12, and 10 years old. My wife Lena is from Pedro Bay on Lake Iliamna.

I have a BA Degree in Social Work from the University of Alaska (1988). While in college I did several internships in the following organizations:

- (1). Crisis Inc.-Suicide Prevention Center
- (2). Alaska Youth & Parent Foundation
- (3). Abused Women's Aid in Crisis Center (AWAIC)
- (4). McKinnell Residence (Shelter for Homeless)
- (5). Salvation Army
- (6). Bean's Café

I worked 10 years, 1980 to 1990, for the Anchorage School District, Indian Education Program, as a Tutor/Counselor for students in K- 6th grade in the following 5 different elementary schools:

1. Inlet View.
2. Fairview
3. Government Hill
4. Russian Jack
5. Klatt

I have worked the last 10 years, 1990 to Present, as a Vocational Counselor, for the State of Alaska, Dept. of Labor, here in Anchorage. While working here I counseled people on how and where to find jobs, and choosing careers. I also administered and interpreted Interest/Aptitude Tests, provided information about Occupations, Job Outlooks, Financial Aid, School Info. Presented Resume/Job Search Workshops, and Labor Market Information to 1,000's of individuals and dozen's of organizations. I've even met several young people from Nondalton and Pedro Bay in the course of my duties over the years.

From 1973 to 1977, I was in the U.S. Air Force working as a Personnel Specialist and got out with an Honorable Discharge. I was stationed in Austin Texas, Biloxi Mississippi, and Elmendorf AFB here in Anchorage, Alaska. I'm a graduate from East Anchorage High School in May 1972.

My father is a Retired Tech Sergeant living in Beckley, West Virginia. As an "Air Force Brat", I lived in Orlando Florida, Tampa Florida, Hampton Virginia, and Ankara Turkey. After living for 7 years during the late 50's and early 60's in Florida, I can attest first hand to prejudice and racism. I still remember seeing signs that read, "No Negro's Allowed"; and from what I heard up here in Alaska, where there were similar signs that read, "No Natives or Dogs Allowed". So... I've been around and seen a lot of different places.

I think my education, training, and experience allows me to speak first hand about the effects of alcohol-drug addictions. I know how it affects the growth, development, and education of people. I also know how it affects the jobs/careers of people during their lifetime. I'm also very familiar with how "Government and Politics" work, and this is a case in study now! I know how agencies in government are funded, organized, managed, (or mismanaged), connected, and how to influence them (or if I don't I have friends that do!).

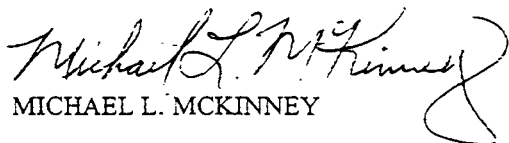
I'd like the People of Nondalton to know that **letters and meetings like this can and should be used to send messages to government in getting other problems fixed.** This is why I wrote the letter. I had to "step on a few toes", make a few "jabs" and I'm sorry. I'm not from Nondalton but I've been there and saw a few things I didn't like. But I saw lots of things in Nondalton I did like, and lots of people with lots of potential who could do great things if they just had the right guidance. My main purpose was to get the people in Nondalton motivated to think about things and maybe do something to change things for the better. I felt that if I could get people to talk about problems, look around, and see how things are, then maybe they would do something. If I motivated people by reading this letter then I felt I had accomplished one of my ideas. I wanted people to look at things not for what they are but for what they could be. Nondalton is in a beautiful area, imagine how better it could be.

Small minds talk about people. Average minds talk about events. Great minds talk about ideas. I have a lot of good ideas and can't wait to share them when I'm finally able to live in Nondalton.

A great man once started a speech like this, "I have a dream..." I have a dream too, and it's living in Nondalton. If I upset anyone then I apologize. My intentions are good and honorable. Like the Circle of Life, I'd like to make more friends to add to my circle of friends in Nondalton. I'm willing to sit down and talk about this to anyone in person. Several people in Nondalton know how to get a hold of me and they can give you my phone number if you would like to talk more about this project with me.

It's been said, "If you lose money you've lost a little. If you lose a friend you've lost a lot. If you lose hope you've lost everything". **I have hope for Nondalton.**

Sincerely,


MICHAEL L. MCKINNEY

WRITTEN PUBLIC HEARING COMMENTS

MAR 10 '00

For your convenience and to ensure that your comments become part of the formal record provided this sheet. If the space is not sufficient, feel free to include additional sheets.

Iliamna-Nondalton Road Improvements
Project No. 51951

NAME: William W. Trefon Sr.

ADDRESS: P.O. Box 46, Nondalton, Alaska 99640

we have	COPIES	ACTION
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr. JD	/	
Env. Coord.		1
Env. Team Leader	/	
Staff		
Hydroicglst		
Project File		
Central File		/

COMMENTS (Please Print)

I AM The Tribal President of Nondalton Deniema Tribe I AM Also serving on State Fish & Game Advisory Committee For Lake Iliamna Area Also serving on The Lake Clark Subsistence Advisory Commission, I've served on various Local And Regional Political Position In The Past 30 years, I've lived in Nondalton All my life, which is over 60 years. But This Testimony is my Personal Testimony which I do Believe Believe most of The Tribal members And Local Resident Will Agree

I AM For The Road And Bridge To Be Built, I do Believe it Will Enhance Local Business And Individual And Health Care. It Will Cut some cost of Heating Fuel, Gas And Freight For Nondalton Residents. The only way we get Freight And Fuel is through A Freight Plan or put it on Northern Air Cargo To Iliamna which we have to handle it 7 Times before we get it to where it will be used Health Care Issues. Especially Medvac Patient To A Hospital in Anchorage with The Road And Bridge^{3rd} during Bad weather we can transport The Patient To Iliamna Airport where they

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

WRITTEN PUBLIC HEARING COMMENTS

For your convenience and to ensure that your comments become part of the formal record we have provided this sheet. If the space is not sufficient, feel free to include additional sheets.

Iliamna-Nondalton Road Improvements Project No. 51951

NAME: William W. Trefon Sr.

ADDRESS: PO. Box 46 Nondalton, Alaska 99640

COMMENTS (Please Print)

Have Equipment To Bring IN A Plane During Bad weather
Also Educational Events Between The Three Villages Will Be
more Accessible And Safe For our Childrens Travels. I do Not
Believe The Road? Bridge Will Effect Small Air Taxi People will
still use Thier Services. Trespass is AN ISSUE That do Exist
Today And IN The Past Not only By Road, But Air As well, Which
I Think can Be Addressed By Local Agencies And Law Enforcement.
We Been using The Pioneer Road year Around And during some
Times of The year The Road gets Pretty Bad For Travel We've Hauled
4 Wheelers Across The River Also cross The Lake on Ice during
The winter And sometimes we've had mishap Like Dumping 4 wheeler
in The River or some vehicles going Through The Ice. mishap do
Happen Tho matter How careful you Are.

The only Alternative We have Besides Building The Road And
Bridge is move And extend our Airport Which can Be Very costly
Finally I would Like To say The Road And Bridge Been studied
And surveyed Enough, The Environmental Assessment Study Prepared
By DOT. is Enough To Built The Road And Bridge.

PAGE 2 of 2

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

D-83

William W. Trefon Sr.

WRITTEN PUBLIC HEARING COMMENTS

RECEIVED

For your convenience and to ensure that your comments become part of the formal record we have provided this sheet. If the space is not sufficient, feel free to include additional sheets.

Iliamna-Nondalton Road Improvements
Project No. 51951

NAME: Joanne Wassilie
ADDRESS: Box 53 Newhahn, AK 99606

Prelim. Design & Environmental Section	COM	ACTION
PD&E Eng.		
Project Mgr. JD	/	
Env. Coord. JR	/	
Env. Team Leader (S)	/	
Staff		
Hydrologist		
Project File		2
Central File		

COMMENTS (Please Print)

I would like to see the road & bridge be worked on this summer. The cost for airfare & freight is very expensive. We need this road put in because we travel and communicate alot with Nondalton. We are establishing the Nilavena Consortium and ~~we~~ it will be easier & cheaper for them to come down with a truck. If we can offer cheaper food, gas freight cost to this village, it will be easier to and for each family. The resident out here in the bush are having hard enough time to pay for our high cost of living. We need this road and bridge put in.

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

WRITTEN PUBLIC HEARING COMMENTS

MAR 13 '00

For your convenience and to ensure that your comments become part of the formal record, we have provided this sheet. If the space is not sufficient, feel free to include additional sheets.

Iliamna-Nondalton Road Improvements
Project No. 51951

	DATE	ACTION
PD&E Engr		
Project Mgr. JD		<input checked="" type="checkbox"/>
Env. Coord. JR		<input checked="" type="checkbox"/>
Env. Team Leader SW		<input checked="" type="checkbox"/>
Staff		
Hydrologist		
Project File		<input checked="" type="checkbox"/>
Central File		<input checked="" type="checkbox"/>

NAME: Peter John

ADDRESS: P.O. Box 112 Nondalton Ak 99606

COMMENTS (Please Print)

WE NEED ^{ROAD} ~~ROAD~~ FROM ILIAMNA - NONDALTON ^{BAD} ~~ROAD~~

NOTE: To mail, fold along dotted lines on the back of this sheet and tape or staple so that the address shows. Written comments will be accepted until 4:00 p.m. March 13, 2000.

March 10, 2000

Subject: Iliamna-Newhalen Road Improvements

To whom it concerns:

My name is Louise Anelon, I am a year round resident of Iliamna, I am originally from Nondalton, and I am a Community Health Aide. We live on the road that goes to Nondalton. I see the benefits of the road completion to Nondalton. The main one is access to a longer airport that is maintained year round by the State of Alaska. The people would have a better chance of getting medivac planes that could land here for life threatening situations. I would like to see the road completed and improved because of the past years there was many deaths and accidents due to bad weather, road conditions, and also the Airplanes could not land in Nondalton because no lighted runway for Medivacs. A lot of people use the road year round, for getting supplies, picking up freight and for health reasons. The road would help all three villages economically. The E.I.S. statement is not needed to complete this project.

RECEIVED

MAR 14 '00

51951

	COPIES	ACTIONS
Prelim. Design & Environmental Section		
PD&E Engr.		
Project Mgr. JD		✓
Env. Coord. JR		✓
Env. Team Leader YJ		✓
Staff		
Hydrologist		
Project File		2
Central File		✓

EDGREN & ASSOCIATES

GEOFFREY Y. PARKER
CHARLES J. GUNTHER

*Admitted in Alaska and Virginia

A PROFESSIONAL CORPORATION

March 14, 2000

Writer's Direct Dial Number:
(907) 272-3051

RECEIVED

MAR 17 '00

Mr. Jerry O. Ruehle
Environmental Coordinator, Preliminary Design and Environmental
Alaska Department of Transportation & Public Facilities
P.O. Box 196900
Anchorage, Alaska 99519-6900

Mr. Victor O. Ross
U.S. Army Corps of Engineers
Regulatory Branch
P.O. Box 898
Anchorage, Alaska 99506-0898

Prelim. Design & Environmental Section	COE
PD&E Engr.	
Project Mgr. JD	/
Env. Coord. JR	1
Env. Team Leader SA	/
Staff	
Hydrologist	
Project File	
Central File	/

Re: **Comments; Draft Environmental Assessment, Proposed Iliamna-Nondalton Road and Bridge, State Project No. 51951; COE 2-830477, Newhalen River 4**

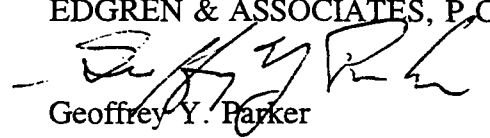
Dear Mr. Ruehle and Mr. Ross:

Enclosed is a corrected copy of my 20 pages of comments I filed yesterday on the EA.

Mostly, I fixed editorial errors -- misspellings, missing critical words (in one case the word "not" was missing), and that sort of thing. I revised my comments (on pp. 16-17) on whether the road would increase access to alcohol and drugs in Nondalton, as several people have asserted, to tie the issue to Executive Order 12898 on environmental justice. To my comment (on p. 12) that the EA does not adequately address scouring caused by the riprap at abutment no. 1, I added that the EA also does not address the 25-year flood as required by the Borough's CZM plan.

Sincerely yours,

EDGREN & ASSOCIATES, P.C.



Geoffrey Y. Parker

Enclosure

- cc: FHWA/Juneau
- ADF&G/Habitat
- FWS/Anchorage
- NMFS
- OMB/Division of Governmental Coordination

EDGREN & ASSOCIATESGEOFFREY Y. PARKER
CHARLES J. GUNTHER

*Admitted in Alaska and Virginia

A PROFESSIONAL CORPORATION

March 13, 2000

**Writer's Direct Dial Number:
(907) 272-3051**

Mr. Jerry O. Ruehle
 Environmental Coordinator, Preliminary Design and Environmental
 Alaska Department of Transportation & Public Facilities
 P.O. Box 196900
 Anchorage, Alaska 99519-6900

Corrected Copy (3/14/00)

Mr. Victor O. Ross
 U.S. Army Corps of Engineers
 Regulatory Branch
 P.O. Box 898
 Anchorage, Alaska 99506-0898

**Re: Comments; Draft Environmental Assessment, Proposed Iliamna-Nondalton
 Road and Bridge, State Project No. 51951; COE 2-830477, Newhalen River 4**

Dear Mr. Ruehle and Mr. Ross:

Thank you for the opportunity to comment on the above-referenced environmental assessment (EA).

These comments are filed on behalf of the Alaska Sportfishing Association, the Alaska State Council of Trout Unlimited, Robert Gillum, and Bill Wiener, all of whom sued the Federal Highway Administration, in Alaska Sportfishing Association, et al. v. Robert E. Ruby, Case No. A97-205 Civ. (U.S. D. Ct., Alaska, 1997) over this project.

These comments are in two parts. Part A makes general comments about the sufficiency of the EA as a whole. Part B makes specific comments which go to the text of the EA, citing to page, paragraph, etc.

PART A – GENERAL COMMENTS

- I. THE EA SHOULD NOT BE APPROVED AND NO PERMITS SHOULD BE ISSUED BASED ON IT BECAUSE, IN TWO RESPECTS, THE EA DOES NOT INTEGRATE THE NEPA PROCESS, AS REQUIRED BY FEDERAL LAW, WITH THE TRANSPORTATION PLANNING PROCESS.**

NEPA regulations, at 40 CFR 1501.2, require that the NEPA process be integrated

①

with other planning processes. The heart of the transportation planning process is 23 USC 135, and its implementing regulations at 23 CFR Part 450. States must prepare long-range, twenty-year Statewide Transportation Plans. 23 USC 135(e). The States had to complete the plans by January 1, 1995. 23 CFR 450.224. States must also prepare short-term Statewide Transportation Improvement Programs (STIPs) that list projects contemplated to be undertaken within the time-frame of a STIP. 23 USC 135(f). All projects funded by FHWA must be consistent with the 20-year plan. 23 USC 135(f)(2)(C).

The EA does not integrate these aspects of transportation planning.

A. **The EA fails to integrate the long-range planning process and in effect asks FHWA to repeat the same legal error it committed in 1996**

2

More than nine years have passed since Congress required long-range plans, and more than five years have passed since Alaska had to have one in place. Alaska still has not completed its long-range plan.

The EA fails to touch upon this shortcoming, let alone discuss and rationalize, how this project can be consistent with a plan that does not exist.

In so doing, EA fails to fulfill an important role of NEPA, which is to put relevant information in front of the public and other agencies so that they can comment. It fails to inform the public and other agencies that Alaska's lack of a 20-year plan renders it impossible for FHWA, ADOT, PF, other agencies, and the public to comment upon, let alone determine, whether this project is consistent with whatever long-range plan ADOT/PF finally develops.

ADOT/PF has undertaken regional planning as its method of assembling a statewide plan. The Southwest Alaska Transportation Plan is not completed, either. What has been prepared is a technical memorandum, prepared for ADOT/PF by a consulting firm, Parsons Brinkerhoff, and styled as "Southwest Alaska Transportation Plan, Description of Alternatives – Technical Memorandum", dated August 1999.

This technical memorandum inappropriately states that Iliamna-Nondalton road and bridge project -- which has not yet been built, and for which no EA has been approved and no permits have been issued -- is part of the "baseline" condition for the area for purposes of long-range planning.¹ The technical memorandum tells us how this

¹ "Southwest Alaska Transportation Plan, Description of Alternatives – Technical Memorandum", Parsons Brinkerhoff for ADOT/PF, August 1999, pp. 11-14, 18.

came about. Originally, Parsons Brinkerhoff identified the link between Iliamna and Nondalton as “missing or underserved” – i.e. not part of the baseline condition.² Then, on March 1, 1999, Parsons Brinkerhoff met with ADOT/PF staff and revised the alternatives for the southwest Alaska transportation planning process. With respect to the Iliamna-Nondalton project, the technical memorandum states that these revisions included to “treat this concept [of a road between Iliamna and Nondalton] as a funding decision that has already been made and programmed.” The reason was: “Iliamna to Nondalton Road completion has already been programmed in the STIP.”³

At this point it is useful to recall the prior litigation. Prior to suit, ADOT/PF had represented to FHWA in 1996 that the partially built road was a completed road and was therefore subject to categorical exclusion from NEPA. Then in court, FHWA admitted in its answer that the road did not exist. It withdrew funding, agreed to prepare an EA, paid plaintiffs’ fees and costs, and the parties voluntarily dismissed without prejudice to let the EA process proceed.

Now, after the litigation, ADOT/PF and Parsons Brinkerhoff are again treating the partially built road as if a completed road exists and is part of the “baseline” condition for purposes of long-range planning.

It is easy to see that ADOT/PF is inviting FHWA to make the same mistake twice. Previously, ADOT/PF treated the road as an already existing highway, and convinced FHWA to do so, in order to circumvent NEPA. Now, ADOT/PF is treating the road as part of the “baseline” condition in order to circumvent the requirement that projects must be consistent with a 20-year plan. FHWA should not should make the same mistake twice.

That, in a nutshell, is a threshold problem with the EA. It does not integrate the requirement that projects must be consistent with a 20-year plan and that it is impossible for anyone to claim that this project is consistent with the state’s 20-year plan.

B. The EA fails to integrate the current Needs List

Nor does the EA inform the public or the agencies that ADOT/PF’s 2001-2003 Needs List ranks the Iliamna-Nondalton project as a “Priority 3” project.⁴ This is the lowest priority ADOT/PF uses to rank and compare whether projects are worthwhile.

² Id at p. 4, 6 (Tables 2 and 4).

³ Id at p. 8 (Table 6).

⁴ “Transportation Needs and Priorities in Alaska”, Appendix A, “2001-2003 Needs List Tables, p. A-94 (ADOT/PF, August 1999).

3

ADOT/PF's transportation planning process for a STIP starts with the "Needs List". ADOT/PF uses a two-step method of ranking and comparing potential projects. First, ADOT/PF staff rank projects by scoring them according to criteria used by ADOT/PF's Project Evaluation Board. Second, because the number of potential projects vastly exceeds available revenue, only those projects with high scores are sent to the six-person Project Evaluation Board, composed of regional directors and the division heads. The Board re-scores those projects sent to the Board, and these become "Priority 1" and "Priority 2" projects. Those not sent to the Board are "Priority 3".

ADOT/PF acknowledges that "[r]ealistically, because of limited funds, only the Priority One projects have a chance of being constructed within the first four years of a State Transportation Improvement Program (STIP)."⁵ Thus, because Iliamna-Nondalton is "Priority 3", it never made the necessary first cut in the 2001-2003 Needs List. It did not score it high enough to be sent to the Project Evaluation Board for further scoring.

The EA's failure to inform the public and other agencies that this project has such a low priority denied to them the opportunity to comment knowledgeably about the need for this project and about alternatives, particularly the "no build" alternative, which would make the money available for higher priority projects.

So, a reasonable question, which should have been addressed by the EA is: Why is ADOT/PF pursuing the Iliamna-Nondalton project when it received such a low priority and would ordinarily not be built within the foreseeable future? The EA gives short shrift to this question by simply saying that the project was in a previous STIP.

A more accurate answer is that ADOT/PF is treating Iliamna-Nondalton as a "carry-over" project. Carry-over projects are those that were in a prior STIP, based on priorities in a prior Needs List, but were not built for some reason. They are "carried-over" in the 2001-2003 Needs List on the assumption that being in a past STIP warrants future approval. They are automatically "scored" high at "179" to "199" in the Needs List to identify them as "carry over" projects rather than as having actual scores by staff or the Board.⁶ Undeniably, this practice of not scoring "carry-over" projects perpetuates ADOT/PF's past decisions regardless of whether they are well reasoned or poorly reasoned, lawful or unlawful.

Of course the EA does not inform the public or the agencies of the most recent history of this project when ADOT/PF sets forth what the history (EA at 5-6) that

⁵ For an explanation of priorities, how they are set, and what gets built, see "Transportation Needs and Priorities in Alaska", pp. 6-8 (ADOT/PF, August 1999).

⁶ *Id.*, p. 17.

ADOT/PF sees as relevant to integrating NEPA and transportation planning. The history not stated is that, because only "Priority 1" projects have a realistic chance of being built within the time-frame of a STIP, the Mayor of Nondalton met with ADOT/PF's commissioner on November 22, 1995 -- long before ADOT/PF adopted its FY 2001-2003 Needs List -- and asked Commissioner Perkins to raise this project to "Priority 1".⁷ Shortly afterwards, the Board raised it to "Priority 1" in the 1996 Needs List. The records of the Board state that it was raised to "Priority 1" because the Governor supported it. This is not a criterion used to rank projects. That is how the project got into the 1996-98 STIP, and that is why the 2001-2003 Needs List shows it with a "score" of "199", thereby demonstrating that ADOT/PF treats it as a "carry-over" project.⁸

However, the Needs List gives a true rank as "Priority 3". Does the EA integrate this fact by informing the public and the agencies of that fact? Of course not. Should it have done so. Of course it should. Doing so faithfully integrates NEPA and the transportation planning process.

Had the EA revealed the "Priority 3" status of this project and acknowledged that only "Priority 1" projects get built in the time-frame of a STIP, then it would be hard to envision that any member of the public or any agency would say that this project is an efficient use of FHWA funds, as is required by ISTEA and TEA-21. The money is better spent on higher priority projects. ISTEA's requirements for efficient use of transportation monies mandate that be the case.

C. Conclusion

The EA does not integrate NEPA and two aspects of the transportation planning process. It does not integrate the long-range planning requirements, the fact that Alaska has not prepared a long-range plan, and the fact that it is impossible to determine as federal law requires, that this project is consistent with a long-range plan. It does not integrate the most relevant facts and history of this project with respect to its low priority. Under these circumstances, FHWA should not approve the EA, and federal and state agencies should not issue permits or funds based in part upon the EA. To do so risks abuse of NEPA, ISTEA/TEA-21, and federal and state Administrative Procedure Acts.

The appropriate course is to defer approval of the EA and defer issuance of permits until ADOT/PF completes its long-range plan and until FHWA and ADOT/PF can then properly integrate the NEPA process and the transportation planning process.

⁷ ADOT/PF staff "Briefing Paper" prepared for Commissioner Perkins for meeting with Mayor of Nondalton, dated February 22, 1995, in ADOT/PF, Iliamna-Nondalton files.

⁸ Id. p. A-94.

Only when ADOT/PF completes its 20-year plan will there be a basis for addressing whether this project is consistent in terms of need versus other projects, and in terms of design and location.

II. IT IS NECESSARY TO PREPARE AN EIS BECAUSE THIS PROJECT IS A KEY ELEMENT OF THE PROPOSED COOK-INLET TO BRISTOL BAY CORRIDOR.

5

The absence of a long-range plan throws a wrench in the works for this project, not only for purposes of the consistency requirement, as previously discussed. It also does so for purposes of environmental issues to be addressed under NEPA.

It is well settled in the case law that NEPA does not permit incrementalizing a project.

ADOT/PF's consultant on the long-range plan, Parsons Brinckerhoff, states that "[a] key baseline improvement programmed within the proposed corridor" from Homer to Williamsport Bay by ferry and from there to Pile Bay, Iliamna/Nondalton, Igiugig, and Naknek/King Salmon, "is completion of the Iliamna-Nondalton Road."⁹ If the corridor were roadway from Williamsport Bay to Naknek/King Salmon, then Parsons Brinckerhoff claims that the northern part of the corridor (Homer to Naknek/King Salmon) would cost \$201-282 million¹⁰ and would receive 243,300 to 315,800 person trips per year.¹¹ If the corridor were roadway from Williamsport Bay to Pile Bay and hovercraft or shallow-draft vessel from Pile Bay or Pedro Bay to Naknek via Iliamna Lake and the Kvichak River, then Parsons Brinckerhoff claims that the northern part of the corridor (Homer to Naknek/King Salmon) would cost \$24-27 million¹² and would receive 34,100 to 37,400 person trips per year.¹³ Annual operations and maintenance would cost millions more (see tables cited). Other extensions or alternatives could be added to the Cook Inlet-Bristol Bay Corridor.¹⁴

⁹ "Southwest Alaska Transportation Plan, Description of Alternatives – Technical Memorandum", Parsons Brinckerhoff for ADOT/PF, August 1999, p. 18.

¹⁰ Id at 31, 33 (Tables 18 and 20).

¹¹ Id at 32, 34 (Tables 19 and 21).

¹² Id at 35, 36 (Tables 22 and 24).

¹³ Id at 35, 36 (Tables 23 and 25).

¹⁴ These would be to create a road from Naknek to Pilot Point/Ugashik and Port Heiden, costing \$287-324 million and carrying 439,400 person trips per year; to create a road from Port Heiden to the Chigniks, Perryville and Ivanof Bay, costing \$175-197 million and carrying 369,000 person trips per year; and to create ferry service from Naknek to Dillingham and Togiak, costing \$3.5 million and carrying 3,900 person trips per year. Id at 75, 83, 84, 87 (Tables 58, 63, 64, 68)

If the Iliamna-Nondalton Road project is truly a “key” improvement in a larger set of alternatives under consideration in the long-range planning process, then the EA is impermissibly incrementalizing a greater alternative in that process.

The environmental and related social and economic impacts of this Cook Inlet to Bristol Bay corridor are likely to be quite significant and warrant an EIS.

There would be road access to Lake Clark National Park and Preserve via Nondalton and potentially thousands more users with many associated impacts.

The Newhalen River, Taziminia River, Upper and Lower Talarik Creeks, the upper Kvichak River (“Koskanhok Flats” and the Naknak River – all presently accessible only by air from Anchorage -- would suddenly be accessed by vessel and road from Homer.

Sport fishing pressure would be likely to increase greatly. So would hunting pressure.

Conflicts would increase between local and nonlocal users of fish and wildlife, between subsistence and nonsubsistence users, between sport and commercial, between guided and unguided users, and between consumptive and nonconsumptive users of some stocks of wildlife. For example, brown bear densities are extremely high at the confluence of Funnel and Moraine Creeks in Katmai Preserve, would and do provide excellent viewing opportunities (primarily for sport anglers), but if this corridor were created, then the time and cost for air travel shrinks greatly, and the state and federal resource agencies are likely to have another dispute on their hands similar to those that have occurred elsewhere between those who seek wildlife viewing opportunities and those who also fish consumptively or nonconsumptively, hunt, guide or subsist.

Trespass would also increase.

So would the number of cabins and the pressure to subdivide property.

So would the pressure on brown bear. Experience over the last decade on the Kenai Peninsula shows that cabins and roads increase brown bear mortality due to defense of life and property and decrease hunting and viewing opportunities.

As part of the scoping process for this EA, I provided to ADOT/PF studies of sport fishing economics in Southcentral and Southwest Alaska. They indicate that roads alter the character of the fishing lodge industry, its customers, its economics and job

production, and the fish upon which it depends would change greatly. Presently, it is high-end, overwhelmingly nonresident in its customer base, highly efficient in producing jobs and commerce. The chief factors customers use in determining where to spend their recreational dollars are target species, of which the chief is world class rainbow trout, and concern about crowding. Roaded or access/service dependent, it will start looking more like the Kenai Peninsula or Susitna Valley. Emphasis will shift to salmon and a resident-based consumer pool, which will eliminate the nonresident customers seeking world class trout and lack of crowding, and will simply shift resident pressure from elsewhere, thereby creating a loss of jobs and commerce elsewhere while creating low-end jobs and commerce in Southwest at the cost of extinguishing high-end jobs and commerce in Southwest.

These would be significant impacts warranting an EIS. Thus, if the Iliamna-Nondalton project is an increment of, or a key element of, a Cook Inlet-Bristol Bay Corridor, then ADOT/PF has to prepare an EIS on the Iliamna-Nondalton project in the context of the Cook Inlet-Bristol Bay corridor. In that case, the Iliamna-Nondalton project cannot be built until an EIS is done, and the project still must be consistent with the 20-year plan. If Iliamna-Nondalton is not an increment, then it still must be consistent with a 20-year plan. In either case, this EA cannot be properly approved and permits cannot be properly issued until the 20-year plan is in place.

III. INFORMATION FROM SCOPING SHOULD HAVE BEEN PROVIDED TO RESOURCE AGENCIES

6

During the scoping process, the National Marine Fisheries Service requested that information from scoping be provided to the resource agencies. EA at A-79. Nothing in the record in the appendices to the EA indicates that this occurred. My own comments of on scoping, dated November 7, 1997, show that I enclosed with them the prior complaint and the documents referred to in the complaint. These included about a hundred documents, mostly from ADOT/PF files, referred to in the complaint, as well as the reports of biological, economic and highway engineering consultants the plaintiffs hired previously. None of this was apparently sent to the resource agencies as NOAA had requested.

By failing to do so, ADOT/PF denied the agencies and the public the opportunity to be fully informed.

IV. THE ALTERNATIVES ARE INADEQUATE, AND INADEQUATELY DISCUSSED

7

Under FHWA regulations, alternative courses of action must be evaluated and decisions made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation; the social, economic, and environmental impacts of a proposed transportation improvement; and of national, State, and local environmental goals. 23 CFR 771.105(b). CEQ regulations require that information be available to public officials and the public before decisions are made and must be of high quality. 40 CFR 1500.1(b).

Because the State lacks a long-range plan, the EA essentially puts the cart before the horse. This taints how the EA handles alternatives in two respects.

First, in terms of NEPA's requirement that FHWA consider alternatives to a proposed federal action (here, it would be funding Iliamna-Nondalton) and that information be available and of high quality, the lack of a long-range plan leaves everyone involved unable to answer whether building this project is better than building other projects. As shown, it certainly seems that many other projects are of much higher priority.

Second, because there is no long-range plan, it is impossible to say at this point whether or not the Cook Inlet-Bristol Bay corridor project will be undertaken or whether this project will be left standing alone.

Then, because the EA declines to do any benefit-cost analysis (EA at 52), the "no-build" alternative and the alternatives that would build a road and bridge cannot be compared economically in any discussion by agencies and the public.

Finally, the EA ignores an obvious alternative outside of the context of the long-range plan. This project was revived in 1992 when ADOT/PF saw it as a possible way to facilitate development of Cominco's mining claims at the Pebble Beach site located at the headwaters of the Koktuli River and Talarik Creek. According to the EA, presently the mine is on-hold, and Cominco would want a different route for a road and bridge and would need a road and bridge capable of handling trucks hauling ore concentrate. An alternative would be to wait to see if that mine is developed. The EA should have addressed this alternative. TEA-21 requires integrated, not duplicative, transportation systems. 23 USC 135(a)(3).

V. THE EA DOES NOT CITE TO THE DOCUMENTS CITED IN ITS BIBLIOGRAPHY AND THIS UNDERMINES THE INTEGRITY OF THE EA.

8

The EA is very weak on, if not devoid of, citing to documents listed in its bibliography. It is difficult to see how ADOT/PF used the materials listed. That leaves the information in the EA not of high quality.

As part of my comments on scoping I attached the prior complaint to assist ADOT/PF in identifying issues. To assist in addressing issues, I attached documents cited in the complaint.

A handful of these are in the bibliography – for example the economic studies of sport fishers, recreational service providers, and sport fishing economics by Jones & Stokes, Jon Issacs & Associates, and Ackley (a University of Alaska masters thesis).

I did not see that they are cited or utilized in any of the socio-economic discussion of whether the road will have adverse or beneficial impacts on recreational use or economics.

That is typical of nearly everything listed in the bibliography. It lists for example, guidance documents by the Council on Environmental Quality and by the Governor's Office/Division of Governmental Coordination, for considering cumulative effects under NEPA. I would have expected to see these documents cited in the EA at 36-37. They are not. So whether ADOT/PF has complied with them is not clear.

VI. GENERALLY, THE EA IS CONCLUSORY AND PROVIDES LITTLE OR NO NEW ASSESSMENT THAT WAS NOT AVAILABLE IN THE SO-CALLED SECONDARY AND CUMULATIVE IMPACTS STUDY.

9

Generally speaking, the EA speculates about alleged benefits, speculates about and minimizes possible negative impacts, does not support its conclusions with any analysis, and too often does not even address the issues raised in scoping.

I will demonstrate these shortcomings in the specific comments below.

PART B – SPECIFIC COMMENTS

THE EA DOES NOT ADDRESS NUMEROUS ISSUES RAISED IN SCOPING AND IS CONCLUSORY ABOUT THOSE IT DOES ADDRESS.

FHWA's NEPA regulations require ADOT/PF to use the scoping process to determine potential environmental, social, and economic; identify alternatives and mitigation of adverse environmental impacts; and identify other environmental review and consultation requirements that should be performed concurrently with the environmental assessment. 23 CFR 771.119 (1999). The public asked that ADOT/PF respond to issues and comments submitted during scoping process. See, for example, EA at A-133.

During the scoping meetings in Iliamna, Nondalton, and Anchorage, and in related correspondence, many issues were identified. For convenience, these comments organize them, as does 23 CFR 771.119, into environmental, social and economic issues. Unfortunately, ADOT/PF's EA is less than adequately responsive.

A. Environmental Issues Raised in Scoping

1. **Will the bridge have abutment or armor rock below ordinary high water, cause scouring, and be detrimental to fish habitat?**

10

This issue was raised in November 1997 letters by ADF&G and USFWS, both of which recommended against placing abutments and armor rock around the abutments below the ordinary high water (OHW) in order to avoid constriction of the natural stream channel, which increases velocity and erodes the channel and banks downstream. EA at A-90, A-99. FWS wrote that such a design would be detrimental to fishery resources. EA at A-90. On April 17, 1998, ADF&G reiterated this recommendation after that agency reviewed some diagrams of the bridge, and it then recommended that the armor rock be located as far back from the river as possible. EA at A-102.

What is needed, but is not available in the EA, is a diagram of the elevation of the riprap in relation to the elevation of the stream bottom. It is clear that the riprap around abutment no. 1 would extend into the river. EA at Figure 3 (Riprap Detail, Abut. 1, Grade Data). This seems to ignore what the fish and wildlife agencies requested. Figure 3 does not inform the agencies or the public either how far out into the river or how high into the water column the riprap would extend, but the riprap appears to extend 21.3 feet out into the river at ordinary high water on the Iliamna side of the river. EA at C-49 – C-

50. Although the EA at 27 states that the riprap will be keyed in below the riverbed so as to not constrict the natural stream channel, the design drawings seem to show that at least a portion of the riprap below OHW would be in the water column and therefore constrict the river. This seems to be the case because the slope of the top of the riprap below OHW in Figure 3 (Riprap Detail, Abut. 1, Grade Data) seems to be less than the slope of the streambed below OHW in Figure 3 (Elevation) and in Figure 4. ADOT/PF's hydrologist recommended a side slope of 1 vertical to 2 horizontal. EA at C-25. However, the design slope of the riprap below OHW is 1.8 meters¹⁵ vertical to 21.3 feet horizontal. This is a slope of 1 vertical to 4 horizontal. Figures nos. 2, 3 and 4 show that the water is deepest and fastest (a maximum of 3 meters per second, EA at C-25) on the Iliamna side at the bridge. The design appears to divert a substantial cross-section of the volume of water away from its present course. The effect will be scouring, as the water speeds up and is diverted toward the opposite bank and "bounces" from bank to bank until the effect of the displacement dissipates.

Even though the slope of the riprap recommended in the hydraulic/hydrology report seems to differ from that in the design in the EA, the hydraulic/hydrology report did not produce any data to address ADF&G's and FHW's concern about scouring. The report does not provide data on contaction and pier scouring for the 50-year flood or abutment scour for 50-year, 100-year and 500-year floods. See EA at C-24. The EA does not address the enforceable Policy B-5 of the Borough's CZM plan that bridges must be sized to accommodate the 25-year peak discharge without significantly scouring with the substrate of the river.

In short, the EA speaks to but does not address the issue of scouring raised by USFWS and ADF&G. In the absence of information about increased water velocity and scouring caused by the riprap, the public and the agencies are simply left to speculate.

2. Whether the road would increase trespass on private land?

This issue was raised in the scoping meetings at Iliamna, Nondalton, and Anchorage. EA at A-57, A-64, A-68. It was also raised by ADF&G's concern that the road would increase hunting and fishing pressure along the road, which traverses private, Native corporate land. See EA at A-100. It was also one of the seminal concerns of the former plaintiffs in their objections to the project, as recorded in the record prior to the first litigation.

The EA does not address the issue of trespass.

¹⁵ The elevation of OHW, at 75.3 m., minus the elevation of the top of the riprap at its furthest extension outward into the river, at 73.5 m., yields a difference in vertical elevation of 1.8 m.

3. Will the bridge approach on the east bank cut be designed to direct storm water in an easterly direction, away from the river?

12

This issue was raised by ADF&G, which recommended that the east bank be cut to divert storm water away from the river. EA at A-102 – A-103.

The EA does not address how the design of the bridge meets ADF&G's concern, other than to say that the drainage there will be away from the river and treated prior to discharge into the river. EA at 23. The design cuts the east bank down from 311.7 ft. to 262 ft. and unless clarified, it seems to drain the storm water into the river. EA at C-49.

4. Whether fording the river with heavy equipment as occurs without a bridge damages fish habitat?

13

This issue was raised in the Iliamna scoping meeting by a gentleman named "Bert" a "grader operator". EA at A-57. When asked how often, Bert answered that heavy equipment, presumably the grader, goes to Nondalton once a year in April or May. EA at A-59.

Two things can be said about the EA treats Bert's issue and his answer.

First, the EA ignores Bert's answer. See EA at 3. Instead, it treats the issue he raised as the first, and presumably most important, environmental problem worth ameliorating in order to justify the road and bridge. *Id.* This is a transparent effort to make a mountain out of a mole hill, particularly in light of what the EA says elsewhere – i.e. that sockeye and chinook salmon, rainbow trout, grayling, char and whitefish have been reported in the area of the bridge site, EA at 30, but that ADF&G has no studies to confirm spawning there, *id.*

One would think that if the question is whether heavy equipment crossing the river, once to and once back from Nondalton, per year, in April or May, is a serious environmental issue, then ADOT/DF would have used a bit of its money to pay ADF&G, as it can under TEA-21, § 1309, to study the issue.

It did not. If it is an important concern worth ameliorating then it should have been documented. If it is not, then that should be said and the issue should be dropped.

The problem with the EA is that it does neither. It is disserving and arguably manipulative of the issue and the public, and self-serving of the proposal, to say that

heavy equipment, going back and forth once per year, in April or May, is an environmental problem in need of solution, and then provide no documentation on whether the problem is real or just perceived.

Second, by failing to document the issue, the EA creates an issue under the coastal zone management process. The Lake and Peninsula Borough's CZM plan contains an enforceable policy (Policy B-5) that all bridges "shall . . . avoid disturbance of fish spawning habitat." The bridge design that is in the preferred alternative would put pilings in the river and would put riprap of abutment no. 1 below ordinary high water. EA at C-60. If in fact there are spawning fish at the bridge site, or if the question of taking heavy equipment back and forth is an environmental issue, then Policy B-5 requires that ADOT/PF select bridge design that does not disturb the spawning habitat. That would be more expensive. See EA at 12-13.

In sum, by not doing any real investigation of the facts, the EA failed to move this issue beyond where it stood in the secondary impacts study. Naked assertions are made about a perceived environmental problem; the facts that are known -- eg., how often and when the crossing occur -- are ignored because they undermine the alleged importance of the issue; and the factual nature of the issue with respect to whether fish spawn there is not investigated. This is why ADOT/PF can use money under TEA-21, § 1309, to have ADF&G, NMFS or FWS investigate the fish. That ADOT/PF failed to do so taints the EA and ill serves NEPA, the agencies and the public.

5. What is the legal status of the right-of-way?

This issue was raised at the Iliamna and Anchorage scoping meetings. At Iliamna, people asked if the right-of-way would continue to exist if the road were not built, and whether the state would relinquish and restore the right-of-way if the road is not built. EA at A-60. At Anchorage, the question was whether the State still owns the right-of-way. EA-69.

Whether the State still owns the right-of-way is fundamental. During the scoping process, I provided to ADOT/PF the full permit. It was issued under a stipulation that "[u]pon . . . abandonment of any section of the permit area, Permittee [the State of Alaska] shall remove all improvements and restore the land . . . within 60 days." This is important because ADOT/PF abandoned the project in 1986 after the partial construction that exists today.

Why ADOT/PF chose to ignore the issue is unstated and should be included in an adequate EA.

6. Whether the project would repair or cause erosion?

15

This issue was raised in Iliamna, EA at A-58, and by ADF&G and FWS.

Of course, the existing erosion occurring where the portion of the route built in the 1980's with FHWA funds crosses culverts should be repaired. However, it is disingenuous for the EA to justify the project as an opportunity to repair of existing erosion. The EA fails to address that ADOT/PF is legally obligated to maintain what it builds with FHWA funds. The erosion is proof that it has failed to do so.

Because of the obligation to maintain, the repair of erosion is irrelevant to the EA and to whether the rest of the road and bridge is built. The matter of repairing erosion should be removed the EA. ADOT/PF already has a grader and staff in Iliamna. It should just repair the erosion.

However, the EA fails to address the issue of new and additional erosion caused by the design of the bridge. As said previously, ADF&G raised the issue of erosion at the cut in the east bank and suggested draining it away from the river, and both ADF&G and FWS raised the issue of erosion and scouring caused by riprap on abutment no. 1 on the east end of the bridge and urged against putting riprap below OHW. As said previously, the design of the bridge extends the riprap 21.3 feet into the river at a slope of 1:4, which will scour the substrate, and the design seems to drain the storm water at the east cut into the river.

So, all in all, the EA handles the erosion issue poorly.

7. Who would maintain the road? (Iliamna, Nondalton)

16

This issue was raised in Iliamna and Nondalton. At the Anchorage public meeting on March 1, 2000, ADOT/PF said that it still has not worked out an agreement with the local governmental entities on maintenance. This ought to be resolved before the NEPA compliance is completed because the record of maintaining what was built in the 1980's is so poor and is causing erosion into the river, according the EA. At the same meeting, the Mayor of Nondalton stated that Nondalton already spends most of its money maintaining the existing road. It was unclear whether he referred to the existing road from the Nondalton airstrip to the material site to which this project would connect, or whether he was referring to what the Village of Nondalton built in 1983-84 on the Iliamna side of the river where maintenance has been so poor that erosion is now a problem. What was clear is that Nondalton, Iliamna and the borough may not have the

resources to maintain the road, and the issue should be resolved. The EA does not resolve it.

8. Whether the bridge is an aesthetic detraction?

This issue was raised in Anchorage. EA at A-67. The village corporation for Nondalton, Kijik Corporation, stated that the bridge would be an aesthetic objection. *Id.* The EA did not address the issue in its discussion of visual impacts. EA at 31-32.

17

9. Whether the road would impact sport fishing.

This issue contains a host of sub-issues that were raised in detail in scoping, usually in the context of natural resource economics, target species, and potential for crowding, for increased impact on the population and age structure of trout, for effects on existing recreational industry, for increased trespass by sport fishers and hunters, and for increased conflicts between local and nonlocal users and between guided and unguided users in the area. See EA at A-143-146.

18

I suggested that a natural resource economist examine the impact of the road on economic production in the tourism industry. *Id.* I provided three or four studies of sport fishing economics in Southwest Alaska and in Southcentral Alaska which indicate that overcrowding of wilderness based sport fisheries produce less jobs and commerce than not overcrowding them. The EA does not even reference these studies.

Before this road is built, the State should develop an economic model for the tourism industry in the area to assist resource-related decisions such as this. Modeling could focus on target species, crowding, commerce, employment, business success, and options that might stimulate local employment. Instead, the EA simply assumes that the road will promote development of mid-level tourism. It does no cost-benefit analysis, and it does not examine the potential for long range development of private lands.

B. Social Issues Raised in Scoping

1. Whether the road would increase access to drugs and alcohol by residents of Nondalton and decrease public safety?

19

This issue of public safety and alcohol and drugs was raised in the Iliamna, Nondalton, and Anchorage scoping meetings. EA at A-57, A-63, A-67. It implicates Executive Order 12898, Environmental Justice, which requires identifying and addressing adverse human health impacts on minorities, such as Alaska Natives.

In Iliamna, one person said that the road might help control alcohol getting to Nondalton (EA at A-57) and that already there were alcohol-related accidents on four-wheelers on the portion that was constructed in the 1980's. EA at A-57. In Nondalton, one person said the opposite – that the road would increase problems with alcohol and drugs getting to Nondalton. The problems apparently are already bad, and she saw them getting worse. Id. The mayor of Nondalton disagreed. Id. At Nondalton, a participant related that people have nearly drowned attempting to cross the river and that most of these incidents involve alcohol. EA at A-63. At the Anchorage scoping meeting, the Mayor of Nondalton said he would compile accident statistics, and an employee of the Bristol Bay Health Corporation stated that alcohol comes in almost daily and that 93 percent of all arrests in Nondalton are alcohol related. EA at A-67.

Although the issue of whether the road will make it easier for Nondalton residents to get alcohol or drugs from Iliamna was clearly raised at all the scoping meetings, the EA neglects the issue. See EA at 18-19. The best that can be said is that the EA re-casts this issue from one of delivery of drugs and alcohol and driving under the influence to one of delivery of remedial social and police services.

This prompted Mike McKinney to write in opposition to the road. He writes that he who owns property in and plans on retiring in Nondalton, and that his spouse comes from nearby Pedro Bay. I spoke to Mr. McKinney. He states that is a vocational counselor of young adults for the Alaska Department of Labor and was formerly a school vocational counselor in rural Alaska.

Mr. McKinney writes that Nondalton has severe troubles with alcohol and drugs and that the road will greatly increase the availability of them and increase the magnitude of safety concerns related to substance abuse. The reasons, he says, are related to the difference between Iliamna airport and Nondalton airport. Iliamna's is all-weather, with cross-wind strips, and is served by Alaska Airlines, upon which it is easy to ship alcohol, while Nondalton has only one strip, is not all-weather, is not served by the regular airlines and is instead served by entities such as Iliamna Air Taxi. He writes that the road will make is so that Nondalton residents will be able to obtain alcohol easily. He expects an increase in alcohol-related accidents.

The mayor of Nondalton has not produced any statistics that are in the EA.

Executive Order 12898 requires ADOT/PF address whether the road will increase the impact of alcohol and drugs and their consequences on Nondalton residents. To re-cast the issue as delivery of social services dodges the question.

2. Whether the road would exacerbate tensions between local residents and nonresidents?

20

This issue was raised in Iliamna and Anchorage. EA at A-57, A-58, A-68. In Iliamna, participants said that rich tourists do not spend money in Iliamna and neither do weekend tourists. EA at A-58. At Anchorage, participants said that the road would attract day use of the Newhalen River. EA at A-67.

I found nothing in the EA that discusses tensions between local residents and nonresidents.

C. Economic Issues Raised in Scoping

1. Whether the road would be cost-beneficial and create jobs?

21

This issue was raised at the Anchorage scoping meeting (EA at A-67, A-69, A-135, A-143-145), and was raised in the context of local-hire and job creation at the Iliamna meeting (EA at A-57, A-59).

Since the 1970's, various estimates have been generated for the cost of the Iliamna-Nondalton project. Each time, it has been found not economically justifiable because the costs of construction and maintenance outstrip the benefits.

The proposal first surfaced, in the 1970's, as a rudimentary road and bridge costing \$ 6 million. In 1976, ADOT/PF's predecessor, the Alaska Department of Highways, rejected this because the area had a population of 325 and 45 vehicles, and the cost worked out to "the staggering sum of \$125,000 per vehicle."¹⁶

In 1986, after some work by the Village of Nondalton, ADOT/PF calculated the benefits and costs of the State completing and maintaining the project. ADOT/PF calculated all benefits at \$ 3.36 million (in terms of savings on transportation and costs of goods, and one permanent job being created) and all costs of completion and maintenance at \$ 12.83 million, calculated the benefit-cost ratio at 0.26, and concluded that the project was "not economically justifiable" because "it is not conventional to construct projects with benefit/cost ratios of less than one."¹⁷ On April 29, 1986, the Commissioner again terminated the project. In 1987, ADOT/PF calculated the cost of building to federal

¹⁶ Letter, Alaska Department of Highways to Governor Hammond, April 16, 1976, in ADOT/PF files.

¹⁷ "Nondalton-Newhalen/Iliamna Pioneer Road Economic Feasibility Study", March 1986, in ADOT/PF files.

standards at \$ 19 million.¹⁸ In 1996, Jon Manton, an independent highway engineer retired from the State of Washington highway department and certified in Alaska and hired by the plaintiffs in the prior litigation, re-examined these prior calculations and determined that even ADOT/PF's low benefit/cost ratio was too high. It had neglected federal standards for determining benefit-cost ratios for gravel roads, which if applied yielded an even lower ratio of 0.07.¹⁹ His analysis I provided to ADOT/PF in the scoping process, but it is not used or refuted in the EA.

ADOT/PF's 1986 benefit/cost study also calculated benefits and costs for local residents. It calculated user costs at \$ 2.2 million and user savings on air or boat travel and on costs of goods at \$ 1.9 million.²⁰ Thus, even putting aside the millions in construction and maintenance to be borne by the State, the project will cost local residents more than they save. What they will suffer is the hidden cost of creating one job in ADOT/PF.

The EA does not identify what has changed since these events. No new benefit/cost ratio has been done. The EA expressly declines to do one. EA at 52. Nondalton and Iliamna have 326 people; Nondalton has 12 to 15 registered vehicles; the project will create one long-term job in ADOT/PF and none in the private sector.²¹ The cost is \$ 9.75 million in the Needs List,²² but the EA says it will cost less and does not explain the discrepancy. Regardless of which estimate is used, the cost is still staggering for what ADOT/PF concedes is a project of the lowest priority.

Although the EA claims that there will be savings in the delivery of public services, and goods, the EA does not estimate the savings in services and does not estimate the savings in goods. The Mayor of Nondalton claimed a savings in the cost transporting goods would be reduced by 25 percent or more (EA at 20), and at the Anchorage meeting on March 1, 2000 on the draft EA, Mr. Leveque, who runs the store in Nondalton said that the present means of transporting goods to Nondalton adds 12 percent and that the road would reduce this to 4 percent. If all this is true – and ADOT/PF never found out whether it is or not -- the savings appear to me to be within the range of the savings on cost of goods that appears in the 1986 benefit-cost study.

Finally, as said previously, a maintenance agreement is lacking and the EA does

¹⁸ ADOT/PF construction cost estimate dated February 25, 1987, in ADOT/PF files.

¹⁹ Comments of John Manton, re draft "Secondary and Cumulative Impacts Study", in ADOT/PF files.

²⁰ "Nondalton-Newhalen/Iliamna Pioneer Road Economic Feasibility Study", March 1986, in ADOT/PF files.

²¹ Secondary and Cumulative Impacts Study of the Proposed Iliamna-Nondalton Road, pp. 12-13, 24, 46, by Community Planning (Seattle, WA) for ADOT/PF, January 1997, in ADOT/PF files.

²² "Transportation Needs and Priorities in Alaska", Appendix A, "2001-2003 Needs List Tables, p. A-94 (ADOT/PF, August 1999).

not address maintenance costs. This should be addressed.

2. **Why is it an effective strategy that ADOT/PF spent millions rebuilding the Nondalton airport in 1993-94 and now it wants to build a road so that Nondalton residents can use the Iliamna Airport?**

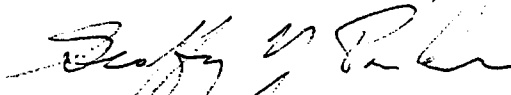
22

This issue was raised at the Anchorage scoping meeting. EA at A-69. ADOT/PF spent about \$4 million rebuilding the Nondalton airport in 1993-94. It did so after Congress passed ISTÉA in 1991 which required intermodal planning precisely to avoid this sort of duplicative waste of taxpayer's money and unnecessary environmental effects.

The EA offers no explanation.

Sincerely yours,

EDGREN & ASSOCIATES, P.C.



Geoffrey Y. Parker

cc: FHWA/Juneau
ADF&G/Habitat
FWS/Anchorage
NMFS
OMB/Division of Governmental Coordination

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN AND ENVIRONMENTAL

TONY KNOWLES, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
(FAX) 243-6927 - TDD 269-0473
(907) 269-0528 or (907) 269-0542

October 27, 2000

Mr. Geoffrey Y. Parker
Edgren & Associates
645 G Street, Suite 300
Anchorage, AK 99501

Dear Mr. Parker:

The Alaska Department of Transportation & Public Facilities (ADOT&PF) received your letters dated March 14, 2000 and October 2, 2000 regarding the Environmental Assessment for Iliamna-Nondalton Road Project (No. 51951) and we would like to take this opportunity to thank you for your comments. Your comments will be part of the official administrative record and will be addressed in the final National Environmental Policy Act (NEPA) document. A copy of that document will be sent to you upon completion.

If you have any further questions please do not hesitate to call me at 269-0572.

Sincerely,



John Dickenson, P.E.
Design Project Manager

cc: Lawrence (Lance) P. Hanf, Agency Counsel, FHWA
Tim Haugh, Environmental/Right of Way Specialist, FHWA
Jack Melton, Area Planner, ADOT&PF
Jerry O. Ruehle, Regional Environmental Coordinator, ADOT&PF

DOT Responses:

1. DOT&PF and FHWA believe this project complies with the requirements set forth in 23 USC 135 (Statewide Planning). The project has been the subject of an intense and comprehensive public involvement process through planning, programming and development. There have been numerous regionally held public meetings, agency site visits, and public comment opportunities throughout the project's development. The project is currently scheduled for construction in the Statewide Transportation Improvement Plan (STIP).

It should be noted that ADOT&PF does have a long-range plan called the Statewide Transportation Plan, Vision 2020 completed in March 1995. It contains a broad policy that guides the development of transportation planning for roads, airports, transit, ports, and harbors.

Area Transportation Plans provide project-level guidance for discrete geographic regions of the state. They are adopted as part of the overall Statewide Transportation Plan. The ongoing Southwest Alaska Transportation Plan is scheduled for completion in late 2000. The plan will identify the project as a baseline improvement because it has been the subject of a public involvement process and because the project is currently scheduled for construction in the STIP.

The STIP is a three-year statewide capital improvement program for highway and transit projects that is consistent with Statewide Transportation Plan, Vision 2020. The project underwent the public involvement process as part of the pre-draft, draft and final 1998-2000 STIP.

The 1998-2000 STIP programmed project design in Fiscal Year 1999 (FY99), followed by right-of-way and construction in FY00. The need for additional time in the design phase pushed the right-of-way and construction phases into FY01 and, consequently, into the proposed FY 01-03 STIP. Extension of the design phase into FY00 was reflected in Amendment 23 of the 1998-2000 STIP.

2. As previously mentioned, ADOT&PF does have a long-range plan called the Statewide Transportation Plan, Vision 2020 completed in March 1995. It contains broad policies guiding the development of transportation planning for roads, airports, transit, ports and harbors.
3. There exists no requirement for the EA to integrate the current Needs List. The Planning process precedes the Environmental process. Your letter mentions the Iliamna-Nondalton Road project is listed in "ADOT/PF's 2001-2003 Needs List" as a Priority 3 project. The ranking was a clerical error. The project should have been listed as a Priority 1. It has been ranked a Priority 1 project for a number of years prior to the latest needs list.
4. No response necessary.

5. The Iliamna-Nondalton project is a distinct project with independent utility. Construction of the project is warranted regardless of the outcome of the possible Cook Inlet to Bristol Bay Project. A separate NEPA document would be prepared for the proposed Cook Inlet to Bristol Bay Corridor project.

Since no potentially significant environmental impacts were identified during the scoping of this project, an Environmental Assessment was prepared. After review of all the public and agency testimony, and written comments on the Environmental Assessment, the Federal Highway Administration will render a decision on the adequacy of the document, and will either: 1) determine that there are no significant impacts, in which case they will issue a Finding of No Significant Impact (FONSI) or 2) require the preparation of an Environmental Impact Statement (EIS).

6. After the completion of the formal scoping period and secondary & cumulative impacts study, a Scoping Summary Report was prepared and delivered to various resource agencies, including the National Marine Fisheries Service. Included in that report was a copy of your November 7, 1997 scoping comment letter. However, due to the volume of the enclosures, they are referenced, but not included in the report. Except for attorney-client confidential files, the public and resource agencies are always welcome to view our files. The files contain the documents you enclosed with your comments. None of the resource agencies asked to review those documents. If anyone had asked, copies would have been made available to them.
7. You mention "because the State lacks a long-range plan, the EA essentially puts the cart before the horse." Once again, we note ADOT&PF does have a long-range plan called the Statewide Transportation Plan, Vision 2020 completed in March 1995. ADOT&PF takes the guidance given in that plan, and develops reasonable alternatives to meet this project's purpose and need. Nine alternatives were evaluated, seven were dismissed for various reasons and two were carried forward in the Environmental Assessment. The preferred alternative evaluates safe and efficient transportation, social, economic, and environmental impacts.

An alternative that you feel was not addressed; "waiting until the Cominco mining claims at the Pebble Beach site are developed" would not meet this project's purpose and need. Because this project is completely independent of Cominco's Pebble Beach Copper Mine, waiting to see if the mine is developed is not a reasonable alternative. At the onset of this project's planning stage, Cominco stated and recently repeated it has no plans to develop the mine site due to poor economic viability for their company.

You are correct, the EA does not include a cost benefit analysis. A cost benefit analysis is not a factor in rating or prioritizing prospective projects in the STIP or

regional plans. As a public entity, ADOT&PF strives to provide for fiscally sound and efficient transportation projects, however a cost-benefit analysis is neither required by NEPA or other Federal or state laws.

8. The NEPA document format does not require a "literature cited" section. The numerous documents in the Bibliography were used as background or research information but are not specifically cited in the EA.
9. The secondary and cumulative impacts study was conducted to assess these impacts. The EA only summarized the results of that study.
10. As commented previously, we propose placing armor rock streamward of the OHW line on the slope below Abutment 1. The rock will be placed flush with the banks and bed, and will, therefore, not constrict the channel. The abutment protection at Abutment 7 is landward of the OHW line and does not encroach into the bed of the river. We have modified the riprap detail figure (Figure 3) in the EA to clarify this point.

Since we propose embedding the riprap flush with the bed of the river (that portion riverward of OHW line) we would not cause any constriction to flow nor causing any velocity increases and have addressed all concerns expressed during the scoping process.

The purpose of embedding the riprap is to protect abutments from scour at extreme flood events. The drawings provided in the General Layout (Figure 3 in the EA) and Site Plan (Figure 4 of the EA) of the bridge plan set illustrate this information. As shown on the plans, the upper slope (1:1.5) closely matches the existing ground slope. The portion riverward of the OHW line closely matches the slope of that portion of the bed.

FHWA requires us to provide pier and contraction scour estimates for the 100-year and 500-year floods. We do not normally report on scour magnitudes for lesser floods. If abutment protection is included in the design, as is the case here, abutment scour is considered nil and reported by the designation "na". Since there will be very little contraction scour at the reported flood levels caused by the proposed work, it follows that there will be even less contraction-scour at lower flow levels. Pier scour is local to the piers and likewise becomes much less at lesser flows. It should be noted that these types of scour are considered temporary. Natural bed in-filling normally occurs after a flood peak has passed. Additionally, these scour estimates are based on empirical relationships that are considered to overestimate the magnitude of scour. It is likely that in this case the amount of contraction scour at any level of flow would be difficult to separate from natural bed movement. The design of the proposed structure meets all of the requirements of B-5 of the Borough's Coastal Zone Management (CZM) Plan, as well as FHWA

design criteria.

11. The Lake and Peninsula Borough believe that constructing a bridge will eliminate an existing trespass situation at the proposed bridge site. Travelers moving between Nondalton and Iliamna frequently leave the State right of way and trespass on private property in order to access a more desirable river crossing point. They also travel along an electric utility line easement which contains a buried high voltage cable. A bridge would resolve this trespass problem. The two largest landowners along the corridor, the Kijik Corporation and Iliamna Natives LTD are very supportive of the project and have indicated they both have land management plans and the ability to deal with trespass situations.
12. The bank on the Iliamna side of the Newhalen River (east bank) will need to be lowered to provide an acceptable bridge slope. During the design and construction phases of the project, ADOT&PF will work with the Alaska Department of Fish & Game, the Alaska Department of Environmental Conservation, and other agencies to minimize erosion and runoff into the Newhalen River so as not to exceed state water quality criteria. Permanent and temporary drainage and sediment and erosion control plans will be reviewed and approved by ADEC during the design phase of the project.
13. Several agencies and individuals have expressed a concern regarding heavy equipment crossing the Newhalen River. Equipment fording the river can impact fish habitat by disturbing the river bank or bottom, and causing sedimentation. ADF&G requires a Fish Habitat permit for motor vehicles to ford an anadromous fish stream. ADNDR has stated "the lack of a bridge across the Newhalen River currently has the potential for adverse impacts downstream as heavy equipment is forced to ford the river." They have stated "...believe construction of a bridge, using appropriate engineering practices, is likely to reduce the sedimentation and erosion problems at the river crossing and improve conditions with regard to water."

ADF&G does issue fording permits to the City of Nondalton, however they have stated they have observed adjacent stream bank and wetland damage which can result in increased sedimentation to the river and possible fish habitat damage. When there are traditional fording sites ADF&G encourages the construction of bridges.
14. The right of way in question was granted to the State of Alaska from the Bureau of Land Management (BLM) under file No. AA-8791, dated March 16, 1976. This right of way remains in effect today.
15. Your statement is correct that the repair of existing erosion problems is irrelevant to the EA and to whether the rest of the road and bridge is built. However, we do have

an opportunity to repair some slopes and correct erosion problems to improve water quality. While this would be an enhancement to the environment, it is not the purpose of the proposed project. Since the existing road was built with Grant money from the Legislature to the City of Nondalton, ADOT&PF is not obligated to repair the existing erosion caused by the local government. ADOT&PF was not involved in the construction, however if the proposed federal project is built, we would fix existing erosion problems.

During the design and construction phases of this project all reasonable efforts will be made to prevent sediment from entering wetlands and the Newhalen River. The Department will prepare an erosion and sedimentation control plan during the design phase. That plan will be submitted to ADEC for review and approval. The Construction contractor will also be required to prepare a Stormwater Pollution Prevention Plan and construct the road in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Construction Activities in Alaska.

16. The L&P Borough and the City of Nondalton have verbally committed to assuming maintenance responsibility for the road at project completion. It should be noted, however, there exists no requirement to finalize a formal maintenance agreement with local government entities as part of the NEPA process. As is standard Department procedure, a routine maintenance agreement may be executed between the Department and the appropriate local governmental entities prior to actual project construction.
17. You reference one person's statement during the Anchorage scoping meeting regarding aesthetics. Since that meeting, some agencies and individuals have been asked for their thoughts regarding how the bridge will look. The majority have indicated they think the current design minimizes the amount of structural material they will see. There is no question that the view will be altered if a bridge is constructed. However, ADOT&PF believes that the current design is non-intrusive and that any resulting visual impacts would not be significant. Whether or not the change in view of the river is adverse is a subjective question.
18. The Secondary and Cumulative Study for this project indicates the proposed project is not expected to induce substantial growth in tourism for any purpose, including sport fishing. While it is likely that some sport fishing will increase with better access, most growth is expected to increase with or without this project. The studies associated with this project indicate that the project would not result in substantial tourism growth, so it is unlikely a substantial increase in sportfishing will result due to this project. Neither ADF&G or other resource protection agencies raised a concern that road improvements and bridge construction would have negative impacts on fish populations or sportfishing opportunities.

19. Various Nondalton residents and agencies, including the State's Department of Health and Human Services agree the road will increase the likelihood of people driving to and from Nondalton, but no one could say for sure whether the purchase of drugs or alcohol would increase as a result of the proposed project. There is no store in Iliamna that sells alcohol, consequently any importation of alcohol would have to be by airplane, which is currently the case in both Iliamna and Nondalton.
20. During the scoping and development of the project, the majority of community residents indicated overwhelming support of the project and any potential conflict between residents and nonresidents was not considered significant
21. see last paragraph of #7.
22. There are many valid and documented economic, health, safety and quality of life reasons for the road and bridge project. They are summarized in the purpose and need section of the EA and elsewhere throughout the document. Many of these reasons go beyond the specific issue of Nondalton residents requiring greater access to the Iliamna Airport. The Iliamna Airport, the proposed Iliamna to Nondalton Road, and the Nondalton Airport will function together to provide residents of the region with an improved, more efficient transportation system.

EDGREN & ASSOCIATES

GEOFFREY Y. PARKER

LAURA M. BOWEN**

*Admitted in Alaska and Virginia

A PROFESSIONAL CORPORATION

**Admitted in Alaska and Washington

Writer's Direct Dial Number:
(907) 272-3051

October 2, 2000

Revised 10/2/00

RECEIVED

OCT -2 '00

Mr. Jerry O. Ruehle (attention: Ms. Susan Wick)
Environmental Coordinator
Preliminary Design and Environmental
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, Alaska 99519-6900

Mr. Victor O. Ross
U.S. Army Corps of Engineers, Regulatory Branch
P.O. Box 898
Anchorage, Alaska 99506-0898

cc: FHWA/Juneau/Environmental Officer

Project Design & Environmental Section	DATE	ACTION
PORE Engr.		
Project Mgr.		
Env. Coord. JB	1	
Env. Team Leader	2	
Staff		
Hydrologist		
Project File		3
Central File L&S, JY		

Re: Additional Comments; Draft Environmental Assessment, Proposed Iliamna-Nondalton Road/Bridge, State Project No. 51951; COE 2-830477, Newhalen River 4

Dear Mr. Ruehle, Ms. Wick, and Mr. Ross:

I am submitting additional comments that focus on the "Statement of Purpose and Need", found in the Environmental Assessment (EA) at 1-4. They are based on readily available information. Most is on the Internet, and from the Federal Highway Administration (FHWA), the Alaska Department of Transportation and Public Facilities (ADOT&DF) and its planning consultant (Parsons Brinkerhoff, Inc.), the National Transportation Safety Board (NTSB), the Consumer Products Safety Council (CPSC), the National Highway Traffic Safety Administration (NHTSA), the National Center for Disease Control (CDC), the Alaska Department of Community and Economic Development (ADCED), and the Anchorage Daily News (ADN). The Alaska Department of Health and Human Services, Division of Public Health, Epidemiology Section, also provided documents, including two recent studies: M. G. Landen, MD, et al., "Injuries Associated with Snowmobiles, Alaska, 1993-1994," Public Health Reports, pp. 48-42 (January/February 1999), and M. G. Landen, MD, et al., "Alcohol-Related Injury Death and Alcohol Availability in Remote Alaska," Journal of the American Medical Association, Vol. 278, pp. 1755-58 (December 3, 1997). The Loussac Library

provided another: T. K. Williams, "Unintentional Fatal Submersion Injuries, Alaska, 1980-1984") (an unpublished Masters Thesis, University of Alaska Anchorage). I also obtained help from the Alaska Department of Environmental Conservation (ADEC).

The documents or excerpts are attached. They undermine and contradict almost every assertion in the statement of purpose and need. NEPA requires that such information be utilized, because it is readily available, of high quality, and because the ADOT&PF-Parsons Brinkerhoff documents are plan-related documents that should be integrated into the NEPA process.

INTRODUCTION

I. The Role of Statements of Purpose and Need

FHWA's NEPA compliance relies in part on supplemental guidance. See note to 23 CFR 771.105(a). Much of this is now collected on FHWA web sites. See 65 Fed. Reg. 33976 (May 25, 2000). FHWA has posted its long-standing guidance paper, "The Importance of 'Purpose and Need' in Environmental Documents", FHWA Office of Environmental Policy (1990) (Exhibit 1, attached).

FHWA issued this guidance because statements of purpose and need are important in NEPA documents but had been "systematically deficient". *Id.* at 1. First, they explain to the public why an agency is proposing to spend large amounts of taxpayers' money while at the same time causing environmental impact. *Id.* at 1. Second, they drive the process of shaping and considering alternatives, including the "no action" alternative. Because all alternatives must be rigorously and objectively evaluated under CEQ regulations, "[w]ithout a well-defined, well-established, and well-justified purpose and need, it will be difficult to determine which alternatives are reasonable, prudent and practical, and it may be impossible to dismiss the no-build alternative." *Id.* Third, and equally important, the transportation planning process can serve as a primary source of information for establishing purpose and need. *Id.* That process is not completed for Southwest Alaska, but I use here information from it that was ignored by the EA.

Statements of purpose and need should be "comprehensive and specific", "rigorously defined", "evolve as information is developed", and "utilize as specific data as possible". It is "not sufficient" to simply state that a need exists. "Supporting data must be provided." *Id.* at 2-3. Repeatedly, the EA falls short in this respect.

"As noted above, the purpose and need define what can be considered reasonable, prudent, and practicable alternatives. The decision-making process should first consider

those alternatives which meet the purpose and need at an acceptable cost and level of environmental impact relative to the benefits which will be derived from the project.” Id at 3.

II. Summary of Statement of Purpose and Need in this EA and its Deficiencies.

The “Statement of Purpose and Need” in this EA asserts that the local communities have identified a “strong need” for improving year-around overland access between Iliamna/Newhalen and Nondalton. EA at 1. It asserts six “specific needs” -- (1) to improve public safety; (2) to improve health care services; (3) to expand and diversify community economics; (4) to make governmental services efficient and convenient; (5) to enhance the delivery of educational services; and (6) to correct existing environmental conditions. EA at 1-4. The statement makes a host of supporting assertions and claims that benefits related to each of the needs will occur. Except for photos of erosion, the EA does not document the needs, the supporting factual assertions, and claimed benefits.

The attached documents provide reams of data to assess the “specific needs”, factual assertions, and purported benefits. On almost every matter, the statement of purpose and need is shown to amount to little more than unsupported assertions and opinions contradicted by the documents. Most importantly, the data in these documents shows that the road and bridge --

- (1) will not improve public safety, but instead, is likely to decrease public safety because of increased use of ATVs and snowmobiles which have high injury/fatality rates, because of the even higher risks when these machines are used with alcohol, and because roads that provide alternative means to obtain alcohol have been shown to increase deaths of Native Americans and Alaska Natives and erode the effectiveness of community decisions to control alcohol by local option;
- (2) will not improve health care services because the population of the communities is too small to support the services suggested in the EA; and
- (3) will not improve the local economies, because comparable roads do not so, and instead negative effects due to consolidation may occur.

The statement of purpose and need also fails to meet other aspects of FHWA’s guidance. Because of lack of documentation, lack of support by or contradiction by available documents, and the likelihood of negative affects, the statement does not facilitate the framing and consideration of alternatives. It cannot justify the financial costs, including millions of dollars to build and maintain this road and bridge, and likely

social, economic and environmental costs, in relation to the unsubstantiated, frequently contradicted claims of benefit.

ADDITIONAL COMMENTS

I. **THE ASSERTION THAT THE ROAD AND BRIDGE WILL IMPROVE PUBLIC SAFETY IS CONTRADICTED BY AVAILABLE EVIDENCE, MUCH OF WHICH INDICATES THAT THE ROAD AND BRIDGE WILL DECREASE PUBLIC SAFETY, INCLUDING IN TRANSPORTATION BETWEEN ILIAMNA AND NONDALTON.**

The statement of purpose and need asserts that there is a need to improve public safety related to air and ground transportation; that a road will provide less reliance on air transportation between Iliamna and Nondalton; and that the likelihood of injury and death resulting from air travel between Iliamna and Nondalton needs to be reduced. EA at 1. It offers three supporting assertions: one, that the occupational fatality rate in Alaska for commercial pilots (271 per 100,000) is twice that of “professional motorized drivers” (130 per 100,000) “with plane crashes being the leading cause of occupational fatalities in Alaska, according the National Safety Council [not a governmental entity] and the National Transportation Safety Board [a federal agency]”; two, that two snowmachine riders drowned in 1988 in a river near Nondalton; and three, that safer overland transportation, especially during inclement weather, reduced visibility and unstable river ice would be preferred. *Id.* The implication is that the road and bridge will increase public safety.

The EA does not cite any documents, or include any in the bibliography, to support any of this.

To assess these unsubstantiated assertions and implications, I obtained information from the Alaska Department of Transportation and Public Facilities (i.e. the Parsons Brinkerhoff documents), the National Transportation Safety Board, the Consumer Products Safety Council, the National Highway Traffic Safety Administration, the national Center for Disease Control, the Alaska Department of Community and Economic Development, the Anchorage Daily News, the Alaska Department of Health and Human Services/Division of Public Health/ Epidemiology Section, and the Loussac Library. I also have communicated with Iliamna Air Taxi.

Generally, this information reveals two sorts of errors, omissions or false implications about public safety in the statement of purpose and need. First, there are those that involve assertions about occupational air travel and the Iliamna-Nondalton

flights. Then, there are those that involve comparing the safety of air travel to overland travel in the context of travel between Iliamna and Nondalton.

A. The Errors, Omissions and False Implications about Occupational Air Travel in Alaska, Which Undermine the Purported Safety Concern About Air Travel Between Iliamna and Nondalton.

1. Erroneous Assertion that Occupational Air Travel is the “Leading Cause of Occupational Fatalities in Alaska” Undermines the Need for the Road and Bridge.

First, let’s dispose of the claim that aviation is the “leading cause of occupational fatalities in Alaska.” According to the Alaska Department of Health and Social Services/Public Health Division/Epidemiology Section and the national Center for Disease Control, commercial fishing is the leading cause of occupational fatality in Alaska, and it leads aviation, the second leading cause, by 50 percent. CDC, “Work-Related Aviation Fatalities – Alaska, 1990-1994,” Morbidity and Mortality Weekly Report (June 6, 1997) (Exhibit 2 attached); State of Alaska, Epidemiology “Bulletin” No. 8 (May 1, 1999) (Exhibit 3 attached).

The need to document assertions in the EA is obvious. To the extent that the EA justifies this road and bridge on a misstatement that is wrong by a factor of 50 percent, the justification is impugned at the outset.

2. Omission of the Factors of that Lead to Alaska’s High Occupational Aviation Fatality Rate Undermines Using that Rate to Justify the Road and Bridge.

The EA does not address whether the factors that lead to Alaska’s high occupational aviation fatality rate apply to the occupational flights between Iliamna airport and Nondalton airport.

According to the CDC (Exhibit 2), in Alaska, 41 percent of occupational aviation fatalities occur when pilots fly into mountain sides and passes. Takeoffs and landings accounted for 56 percent of occupational crashes, but only 12 percent of fatal crashes. Id. Most, 60 percent, of the crashes were associated with unimproved, off-airport sites (e.g., sandbars, mountain ridges, meadows). Id. The Federal Aviation Administration classifies meteorological conditions as Instrument Meteorological Conditions (IMC) and Visual Meteorological Conditions (VMC); in Alaska, crashes occurring under IMC were 5.3 times as likely to be associated with death than crashes in VMC. Id.

The EA is correct that there is no scheduled commercial air or freight service between Iliamna and Nondalton. Iliamna Air Taxi and its mail flights on Mondays, Wednesdays and Fridays provide nearly all the air service. See EA at B-24; personal communication, Iliamna Air Taxi. According to Iliamna Air Taxi, there has never been a fatality, at least in the last 30 years, flying between Iliamna Airport and Nondalton Airport. Personal Comm. Iliamna Air Taxi.

The Iliamna-Nondalton occupational flights are short, 12-minute, unscheduled, airport-to-airport flights, on wheels, and along the Newhalen River and this road route over flat terrain. *Id.* They do not involve IMC. Nondalton's airport is not equipped for instrument conditions. *Id.* Because they are short, unscheduled flights, if the weather conditions are poor, then the pilots simply wait for better conditions. *Id.* Iliamna Air Taxi never flies to Nondalton's airport in anything but visual conditions. *Id.* The concern about inclement weather and reduced visibility is unfounded. The flights do not involve flying amid mountain sides and passes or takeoffs and landings at unimproved sites, and in case of emergency a pilot can land on what already exists of this partially completed road and route. *Id.* Overall, the Iliamna-Nondalton flights – most of which are mail flights -- do not have the risk factors associated with the high occupational-aviation fatality rate in Alaska. Instead, these flights appear as safe as, or safer than, most on-demand charter air services nation-wide, because nation-wide, such services are less likely to short, 12-minute, 15-mile hops, are not in every instance airport-to-airport, and are more likely to involve IMC and airports equipped for instrument flight conditions.

The EA omits all this. This undermines public safety as a justification for the road and bridge, to the extent that the justification relies on comparing occupational fatality rates of commercial pilots and commercial drivers. Furthermore, when there is a choice of which statistics to use, the EA should explain the choice. Here, there are fatality rates and statistics on the factors that create Alaska's the high occupational aviation fatality rate. The latter indicate that there is little concern for occupational aviation safety between Iliamna and Nondalton. These factors appear more useful to the issue at hand – whether to build the road and bridge – than the rate itself.

3. Omitting the Volume and Purpose of Occupational Air Travel Between Iliamna and Nondalton Undermines and Contradicts Occupational Safety as Justifying the Road and Bridge.

The EA omits information and data on air transport of passengers and freight between Iliamna and Nondalton that was available to ADOT&PF from Parsons Brinkerhoff long before ADOT&PF and FHWA released this EA for public comment.

a. Iliamna-Nondalton Air Passenger Data

In 1998, Parsons Brinkerhoff -- ADOT&PF's lead consulting firm on preparation of the 20-year Southwest Alaska Transportation Plan -- prepared and submitted to ADOT&PF an "Existing Conditions Technical Memorandum" ("Existing Conditions Memo" herein, excerpts attached as Exhibit 4 hereto) and a "Travel Demand Forecasts Technical Memorandum" ("Travel Demand Memo" herein, excerpts attached as Exhibit 5 hereto). These memoranda were prepared for purposes of developing a Southwest Alaska Transportation Plan -- part of the 20-year update of Vision 20/20, ADOT&PF's Statewide Transportation Plan, required by 23 USC 135.

Parsons Brinkerhoff estimated that the average annual volume of air passenger travel between Iliamna and Nondalton is only about 67 round trips (or 134 enplanements), out of a total annual volume of air passenger travel in all of Southwest Alaska of 445,131 annual passenger enplanements. Existing Conditions Memo, Table 5.4 (Exhibit 4 at 5); Travel Demand Memo, Table 18 (Exhibit 5 at 2). Even if this estimate were low by a factor of ten, the traffic is trifling and the purported "need" to reduce the risk of aviation injury or death is unsubstantiated.¹

b. Iliamna-Nondalton Freight Data

Parsons Brinkerhoff's technical memoranda do not provide data on airfreight flights between Iliamna and Nondalton. However, other documents and Parsons Brinkerhoff's memoranda bear on the issue of air freight in relation to safety.

(1) The Bulk of Iliamna-Nondalton Freight Moves by Ground, So the Bulk of the Purported Air Safety Issue Related to Freight Falls Away

The Alaska Department of Community and Economic Development maintains an Alaska Community Database accessible on-line. Excerpts are attached as Exhibit 6. Its community overview of Nondalton states that bulk goods are received in Iliamna and then taken by cat-trail to Fish Camp (on Sixmile Lake across from Nondalton) where they are ferried by skiff or barge to Nondalton. ADCED Data, Exhibit 6 at 30. The EA at B-28 says basically the same.

¹ Passenger travel may increase. Parsons Brinkerhoff prepared low, base, and high estimates for years 2010 and 2020. The base forecasts were 80 passenger round trips in 2010 and 88 in 2020. Travel Demand Memo, Tables 20, 23 (Exhibit 5 at 3-4).

Because most Iliamna-Nondalton freight moves not by air but overland, most of the purported concern for occupational aviation safety associated with freight evaporates.

(2) Most of the Remainder of Freight Moves by Mail and Will Continue to Do So, So Most of the Remainder of the Air Safety Issue Related to Freight Also Falls Away.

What is left is a lesser portion of freight that does move by air from Iliamna to Nondalton. Throughout Southwest Alaska, most freight originates in Anchorage, and a substantial percentage travels by "Bypass" mail – parcel post that bypasses postal facilities and is loaded directly at the airport of origin. Existing Conditions Memo, at 117-118, 121 (Exhibit 4). USPS must provide uniform rates. *Id* at 118. The rate is \$0.08/lb. for Bypass mail to all points in Southwest Alaska. *Id* at 121. This compares to \$0.34 to 0.48 per pound for ordinary freight and USPS priority mail from Anchorage to Iliamna. *Id* at 121. According to the EA, air taxis would continue delivery of mail from Iliamna to Nondalton. EA at B-50. These are Iliamna Air Taxi's Monday, Wednesday and Friday mail flights. Because the Bypass mail will still be \$0.08/lb. Anchorage-to-Iliamna, the road creates no savings in freight. Instead, the road will actually create additional costs for Nondalton residents whenever they travel to Iliamna to pick up freight or pay someone to transport it to Nondalton. Because of this additional cost, the volume of Bypass mail, and the number of flights between Iliamna and Nondalton carrying mail, is likely to be unchanged by the road. With that, the remainder of the safety issue as it relates to air freight between Iliamna and Nondalton falls away, too.

B. The EA's Comparison of the Safety of Air and Overland Travel Ignores Information from Seven Federal and State Agencies Which Indicates that the Road and Bridge will Decrease Public Safety.

I will now turn to omissions that indicate that the road and bridge will decrease public safety.

First, the comparison of Alaska's occupational aviation fatality rate to that of commercial drivers begs for better information on two counts. One, the air taxi fatality rate is left begging. Because the planes are air taxis, either on charter or flying mail on contract, the air taxi fatality rate should have been addressed. This rate would probably have been a better rate to use than Alaska's occupational aviation fatality rate. As said, the Iliamna-Nondalton flights do not involve the factors associated with Alaska's high occupational aviation fatality rate. Furthermore, the occupational aviation fatality rate

“includes all occupational deaths related to commercial, military, and general aviation (i.e., all flying not involving military aircraft, scheduled airlines, and commuter or air-taxi service.” Exhibit 2 at 1 (emphasis added). In other words, the occupational rate includes much that is irrelevant and excludes what is relevant. Two, the fatality rates associated with nonprofessional drivers, particularly of ATVs and snowmachines, and particularly when alcohol is involved, are left begging. ATVs and snowmachines are the vehicles of choice in Iliamna/Newhalen and Nondalton, EA at 19, but their fatality rates are excluded by using the occupational fatality rate of professional motorized drivers, which includes bus, truck and taxi drivers hardly relevant here. Again, the comparison includes much that is irrelevant and excludes what is relevant. Overall, it would be more useful to compare the air taxi fatality rate to those of ATVs and snowmachines.

Second, issues related to alcohol and the proposed road and bridge, which were identified in scoping, were left begging. See EA at 18 (discussion of social impacts is devoid of alcohol). In scoping, local residents commented that alcohol, drugs and bootlegging are problems (EA at A-57, A-63, A-64) – i.e. that already there are ATV accidents involving alcohol along the route (EA at A-57); that the road and bridge will increase problems with alcohol and drugs getting into Nondalton (EA at A-63); that most purported near-drownings were alcohol-related (EA at A-63), and that access to alcohol was an issue (EA at A-57, A-63). These comments suggested that an overland safety issue is not so much the risk of drowning while operating a snowmachine but instead is the risk of operating any motor vehicle anywhere while involved with alcohol, and that the overall safety issue is access to alcohol. Later, in comments on the EA, Mike McKinney, who I understand is Native and owns property in Nondalton, elaborated on these concerns and predicted that the road will increase the likelihood of people driving from Nondalton to Iliamna to buy alcohol, and will increase risks of death and injury due to alcohol-related motor vehicle accidents, fetal alcohol syndrome, suicide, and accidents. He pointed to recent incidents.

The task is to compare air taxi fatality data to ATV and snowmachine fatality data, and then address access to alcohol and alcohol-related deaths.

- 1. A Comparison of Air taxi Fatality Data to ATV Fatality Data Indicates that the Road and Bridge will Increase the Risk of Death During Transportation Between Iliamna and Nondalton.**
 - a. Air Taxi Fatality Data.**

According to the attached excerpt of federal NTSB Aviation Accident Statistics, in 1999, there were 38 fatalities during 2,809,000 flight hours for on-demand air-taxi

services. Exhibit 7. Nationwide, this equates to a rate of 0.0000135 fatalities per flight hour. Nationwide air-fatality rates often are not representative of Alaska because of the factors previously discussed. However, as previously discussed, the Iliamna-Nondalton flights lack the factors which make aviation in Alaska risky and appear as safe as, or safer than, most on-demand charter air flights nationwide. Using the nationwide rate seems conservative in this instance.

b. ATV Fatality and Injury Data

Nondalton has only about 12 to 15 registered vehicles and Iliamna a few dozen. EA at B-23-24. The majority of local residents use ATVs, not cars, because the costs of transporting, maintaining and operating full size vehicles so high. EA at 19.

According to the federal Consumer Product Safety Commission (CPSC), in 1997 (the last year for which data is available) the risk of fatal accident involving 4-wheel ATVs (3-wheel ATVs have been off the market since 1988 because of even higher fatality and injury rates) was 0.9 per 10,000 vehicles. CPSC, 1999 Annual Report of ATV Deaths and Injuries (Exhibit 8), at 3. Furthermore, the volume of emergency-room treatment for injuries associated with ATVs is extremely high and increasing. In 1998, there were 73,900 such injuries. *Id* at 4. The largest group of victims is children under age 16. *Id* at 5. Although the 1999 report does not give injury rates, the CPSC did so in CPSC Document #540 (Exhibit 9) (issued in the late 1980's). It states that the risk of injury from ATV riding is high and that over its estimated seven-year life, the average ATV has a one-in-three chance of being involved in an accident resulting in injury. CPSC, Doc. #540 at 1. Although this information is dated, and 3-wheel ATV's are off the market, the 1999 report shows that emergency room treatment for ATV injuries has been rising since the early 1990's. CPSC 1999 Report (Exhibit 8) at 4.

c. Comparing the Air Taxi Fatality Rate to the ATV Fatality Rate

Although the air taxi fatality rate is per flight hours and the ATV fatality rate is per 10,000 ATVs, the rates can compared to some extent if we impose two conservative assumptions.

First, a round trip flight to Nondalton is about 24 minutes. If we assume that every passenger-carrying flight between Iliamna and Nondalton carries only a single passenger, then Parsons Brinkerhoff's estimated rate of 67 round trip passengers per year would equate to about 27 hours flying time when passengers are aboard. This yields a risk of

about 0.00036 air taxi fatalities per year – or risk of about 3.6 fatalities every 10,000 years.

Second, we will assume that ATV users in Iliamna, Nondalton, and Newhalen use ATVs as often as ATV users in the rest of the United States and that factors which increase the risk – i.e. low age of driver, absence of a helmet, the carrying of a passenger, and alcohol (see CPSC Document #540) – occur as often among residents of Nondalton, Iliamna, and Newhalen as among residents of the United States in general. In fact, Alaska accounted for 2.2 percent of all ATV deaths from 1982 through 1998. CPSC 1999 Report (Exhibit 8) at 2. This is a disproportionately high percentage -- about 10 fold -- in relation to population, because Alaska has about 0.2 percent of U.S. population. This high share of incidents probably reflects that Alaskans, and rural Alaskans in particular, use ATVs more – more than United States residents in general and more than United States ATV users in general -- and that the factors that increase the risks (young drivers, no helmet, passengers, and alcohol) probably occur more often in ATV use by Alaskans, particularly rural Alaskans, than by United States users in general.

With these assumptions imposed, it is possible to make conservative observations.

First, if the residents of Nondalton, Iliamna and Newhalen had only three or four ATVs (3.6 ATVs on average) in use per year for the next 10,000 years, then the ATV risk would be three to four ATV fatalities per 10,000 years – i.e. about the same as the air taxi risk, based on Parsons Brinkerhoff's estimate of 67 round trip passengers and our assumptions. Even if the Parsons Brinkerhoff estimate is low, the air traffic is so low that the risk that the EA is discussing – given that the mail flights will continue – remains trifling.

Second, it is safe to assume that there are far more than three or four ATVs in Nondalton, Iliamna and Newhalen. Therefore, the risk of fatality associated with ATVs in these communities appears to surpass the risk associated with the air-taxi travel between Iliamna and Nondalton that actually is addressed by the EA, given that the mail flights will continue. In fact, the ATV risk probably greatly surpasses the air taxi risk, because the assumptions imposed are conservative and there are probably dozens of ATVs across the three communities.

Third, if building a road and bridge between Iliamna and Nondalton increases overland travel, particularly by ATV, between Nondalton and Iliamna/Newhalen, then the likely result is that the risk of death while engaged in transportation between Iliamna and Nondalton will increase disproportionately, as the use of ATVs for personal travel between Iliamna and Nondalton displaces the use of air taxis.

Now, we must address alcohol.

2. The Compelling Evidence is that the Road and Bridge will Cause More Alcohol-Related Deaths than All Deaths It will Save, and that It Will Erode the Ability of these Communities to Control Alcohol Locally.

Because of high risks associated with ATVs, I looked into the safety issues related to alcohol that had been raised by commentators but ignored by the EA. As ADOT&PF knows, all pilots, particularly commercial pilots, operate under very strict alcohol programs and regulations, but nothing comparable exists for operators of ATVs and snowmachines.

a. Data on Drownings Indicate that Alcohol-Related Snowmachining Anywhere is the Issue, not Drowning while Snowmachining.

First, even though the EA did not assert that the two alleged drownings in 1988 occurred while trying to travel between Iliamna and Nondalton, I wanted to see if the drownings could be corroborated. They may have occurred, but I could corroborate little. I reviewed, at Loussac Library in Anchorage, the microfiche of the Bristol Bay Times and the Borough Post for 1988 and found no reports of the two alleged drownings. By computer, the library searched the Anchorage Daily News since 1985. This yielded one drowning near Nondalton, in 1993. The incident involved a snowmachiner and alcohol, according to the State Troopers. See ADN, April 13, 1993 (Exhibit 10). There is no indication that he was trying to go to Iliamna, as the EA implies.

The Loussac Library had a master's thesis on drownings in Alaska in the early 1980's. Although dated, drowning while using a snowmachine or dog sled accounted for 0.8 percent of all drownings and equaled the percentage attributed to drowning while taking a bath. See "Unintentional Fatal Submersion Injuries Alaska, 1980-1984", University of Alaska Anchorage, Tables 7 and 10 (excerpt attached as Exhibit 11 hereto).

The Alaska Department of Health and Human Service, Division of Public Health, Epidemiology Section, provided a recent study: M.G. Landen, MD, et al., "Injuries Associated with Snowmobiles, Alaska, 1993-1994," published in Public Health Reports, January/February 1999, Vol. 114, pp. 48-52 (attached as Exhibit 12 hereto). There were 26 reported snowmachine-related deaths. Of the 17 decedents where blood alcohol concentrations (BAC) were available, 11 (65 percent) had a BAC greater than 100

mg/dL. Id at 48. Drowning while snowmachining accounted for about 25 percent of the deaths. Id at 48. So, the snowmachine-related aspect of the safety issue appears to be operating a snowmachine anywhere while involved with alcohol, not drowning while operating a snowmachine. Mr. McKinney, and others who raised the alcohol issue in the scoping meetings, got it right.

According to this study, Alaska has the highest snowmobile injury death rate in the United States: 2.2 per 100,000 population for 1990-1994. Id at 50. Snowmobiles in 1993-1994 had a calculated rate of death per miles nearly nine times higher than that of ordinary motor vehicles: a rate of 17 snowmobile deaths per 100 million miles driven in Alaska, compared to two deaths per 100 million miles for ordinary motor vehicles. Id at 50. Alaska Natives made up 56 percent of the snowmobile deaths, compared to 19 percent of ordinary motor vehicle deaths. Id at 51. Alaska Natives suffered 7.8 deaths per 100,000 population compared to non-Natives at 1.1 per 100,000. Id at 51. In Alaska during 1993-1994, there were 238 snowmobile-injury hospitalizations, a rate of 248 hospitalizations per 100,000 snowmobiles, compared to 1137 on-road vehicle-related hospitalizations, a rate of 108 hospitalizations per 100,000 on-road vehicles in use. Id at 51. Thus, in terms of injury and death, measured per miles or per vehicle, snowmobiles are much riskier than ordinary vehicles. Furthermore, these rates for snowmachines underestimate the risk by about 50 percent because snowmobiles are only used about half the year. Id at 52. Again, Mr. McKinney's concern that this road and bridge would cause Alaska Natives would suffer disproportionately is corroborated.

b. Data from the federal Fatality Analysis Reporting System Indicates that Alcohol and Motor Vehicles, Particularly ATVs and Snowmachines, is a Key Issue.

Second, the USDOT National Highway Traffic Safety Administration maintains a Fatality Analysis Reporting System (FARS) accessible on-line.

The FARS data (Exhibit 13), from 1994 to 1999, shows that in Alaska alcohol is nearly twice as likely to be involved in fatal ATV and snowmachine crashes – the kind of vehicles common in these communities – as in other motor vehicle crashes. Alcohol was involved in 11 of 15 fatal ATV crashes and 10 of 17 fatal snowmachine crashes reported in the FARS data. For all other types of motor vehicles, alcohol was involved in 195 of 549 fatal crashes.

The FARS data also provides some basis for comparing motor vehicle fatality rates (per 100,000 population) in rural and urban Alaska.

1996-1998 FARS Data – Highway Fatalities per 100,000 population (Alaska)

	1996	1997	1998
Aleutians West		11.02	21.02
Anchorage	6.12	9.36	8.79
Bethel		14.31	
Denali		52.99	222.35
Dillingham	23.5		
Fairbanks North Star	8.42	17.37	12.81
Haines	48.45		
Juneau	7.06	7.17	14.79
Kenai Peninsula	20.78	30.57	26.76
Ketchikan Gateway	21.23	7.09	
Kodiak Island	14.12		
Matanuska-Susitna	42.5	18.92	24.9
Nome	46.67	11.94	
North Slope	15.31	16.12	
Northwest Arctic	15.77	16.12	
Prince of Wales – Outer		15.53	
Sitka	11.26		11.58
Southeast Fairbanks	35.57		
Valdez-Cordova	59.05	49.29	
Wade Hampton		16.76	
Yukon-Koyukuk	59.8	14.85	

Source: <http://maps.fars.com>

Given that Anchorage, Fairbanks and Juneau have most of Alaska's population and generally lower fatality rates, these data indicate that rural Alaska disproportionately suffers motor vehicle fatalities. The increased risk associated with ATVs and snowmachines, particularly when alcohol is involved, correlates with the increased risk associated with higher motor vehicle fatality rates in rural Alaska.

With respect to motor vehicles, Mr. McKinney and others are correct that the transportation safety issue here is operating motor vehicles anywhere while under the influence of alcohol or drugs, not drowning while snowmachining or air-taxis.

c. **A Recent Study in the Journal of the American Medical Association Indicates that Roads to Alternative Sources of Alcohol Dramatically Increase Alcohol-related Injury Deaths.**

The state Epidemiology Section also provided copies of a recent study – M. G. Landen, MD, et al., “Alcohol-Related Injury Death and Alcohol Availability in Remote Alaska”, Journal of the American Medical Association (JAMA), Vol. 278, pp. 1755-58 (December 3, 1997) (attached hereto as Exhibit 14) and an issue of the State of Alaska Epidemiology Bulletin, No. 7 (February 6, 1996) (Exhibit 15) addressing the same study. The JAMA article brings into focus the role that roads play in increasing various categories of alcohol-related injury deaths among rural Alaska Natives.

According to the article, Alaska has the highest age-adjusted injury mortality rate in the United States. JAMA at 1755. In fact, in remote Alaskan villages, injury is the leading cause of death. Id at 1755. Of the deaths of village residents aged 15 years and older, where blood alcohol content was available (200 deaths of 302 records examined), 65 percent were alcohol-related. Id at 1756. The study then compared injury deaths among residents of “wet” and “dry” villages. “Dry” villages, those with more restrictive laws, were defined as those that banned both the sale and importation of alcohol, and “wet” villages were those that prohibited only the sale of alcohol or did not otherwise regulate its availability. Exhibit 15. In “wet” villages, 76 percent of the injury deaths were alcohol-related. JAMA at 1756. The risk of alcohol-related injury death was concentrated among Alaska Natives residing in wet villages. Id at 1756.

Five categories of injury death were examined: motor vehicle, hypothermia, drowning, homicide, and suicide. Alaska Natives residing in wet villages were 6.7 times more likely to die of alcohol-related motor vehicle accidents, more than half of which involved snowmachines, than Native residents of dry villages. Id at 1756 and 1757 (Table 3). Alaska Natives residing in wet villages were 4.5 times more likely to die of alcohol-related homicide than Native residents of dry villages. Id at 1757 (Table 3). Alaska Natives residing in wet villages were 3.1 times more likely to die of alcohol-related hypothermia than Native residents of dry villages. Id at 1757 (Table 3). Alaska Natives residing in wet villages were 1.8 times more likely to die of alcohol-related suicide than Native residents of dry villages. Id at 1757 (Table 3). Alaska Natives residing in wet villages were 1.2 times more likely to die of alcohol-related drowning than Native residents of dry villages. Id at 1757 (Table 3).

These statistics show that drowning is the least of the public safety issues involving these five categories of injury death.

According to the Alaska Alcohol Beverage Control Board (ABCB), Iliamna and Nondalton do not ban both the sale and possession of alcohol. ABCB printout (Exhibit 16 attached). In terms of the JAMA article, they are “wet”, not “dry”. (Newhalen does not appear in printout, which suggests that it is “wet”.)

The JAMA article is particularly useful because it records deaths occurring in rural Alaska by place of residence and by race (FARS records by place death), and therefore the JAMA article reaches observations about the effect that roads, or the lack of them, have on alcohol-related injury-deaths among Alaska Natives. It concludes:

The effect of alcohol prohibition in remote Alaska is different than the mixed results found on several western Indian reservations. Studies of alcohol-related mortality on reservations in the Northwest that had major roads revealed no significant difference in total injury mortality between wet and dry reservations during 1959 through 1974 and 1979 through 1990, although alcohol-related mortality was higher on dry reservations during 1959 through 1974. In a comparison of injury mortality between American Indians and persons of other races in New Mexico, markedly elevated pedestrian and hypothermia mortality rates among Indians were partly attributed to the dry status of the Navajo Reservation, as many reservation residents died along roads to non-reservation towns where alcohol could be obtained. It is likely that alcohol prohibition in remote Alaska significantly reduces alcohol availability because of geographic isolation. * * *

Id at 1758.

This is compelling. Roads that create access to alternative sources of alcohol have negative effects on public safety for American Indians and Alaska Natives. Such roads are likely to increase the rates of alcohol-related injury-death among Alaska Natives, just as they do in the lower-48 studies. The lack of such roads suppresses the rates of alcohol-related injury death among Alaska Natives and accounts for the effectiveness of alcohol prohibitions where they exist. The prohibitions themselves appear ineffective in the presence of roads that create alternative access to alcohol. This appears to be the case among rural Alaska Natives across a broad range of alcohol-related injury deaths, particularly alcohol-related motor vehicle deaths, including in particular those involving ATVs and snowmachines, alcohol-related hypothermia deaths, and alcohol-related homicide deaths, and alcohol-related suicide. See id at 1757 (Table 3).

Iliamna Air Taxi will not fly alcohol to Nondalton, but Northern Air Cargo will fly it into Iliamna, where it can be picked up if this road and bridge is built. Personal Comm., Iliamna Air Taxi.

The conclusion is inescapable. Mr. McKinney and others, who were concerned that this road and bridge would increase alcohol-related risks, got it right. This road and bridge will probably cause Alaska Natives more injury and death, on or proximate to the route, due to alcohol-related use of a motor vehicle, homicide, hypothermia, suicide, and other causes, than it will save from drowning on its route. These adverse human health impacts will be concentrated among Alaska Natives. That implicates Executive Order 12899, Environmental Justice, which requires that such impacts be identified and addressed.

C. Conclusion about the Safety Issue

A mountain of information indicates that public safety considerations do not favor building this road and bridge, and instead that public safety militates against doing so.

The assertion that there is a need to improve public safety does not meet FHWA's guidance that statements of purpose and need must be "well-defined, well-established, and well-justified", "comprehensive and specific", and "rigorous". It and the EA provide no supporting data or documentation. The purported "need", the supporting assertions, and the implied benefit to public safety appear as rationalizations.

When examined in light of data, all that the EA claims appears trifling or contradicted. Flights between Iliamna and Nondalton appear safe and uncomplicated by the factors (flying amid mountains and passes, Instrument Meteorological Conditions, and use of unimproved landing and takeoff sites) that cause higher occupational aviation fatalities in Alaska. Air passenger travel between Iliamna and Nondalton is trifling. Most freight between Iliamna and Nondalton travels by land, not air. What little does travel by air, does so mostly by mail plane and would continue to do so. Hence, the safety issue related to flying passengers and freight falls away. The safety issue related to snowmachines is alcohol, not drowning per se.

But lack of safety benefit is not the worst of it.

First, information from several agencies and studies reported in the Journal of the American Medical Association and in Public Health Reports indicate that this road and bridge will have identifiable, negative impacts on public safety. Those impacts will be concentrated among Alaska Natives. They will bear increased risks in four categories of

alcohol-related injury death: (1) motor vehicle (particularly ATV and snowmachine), (2) hypothermia, (3) homicide, and (4) suicide. Alcohol aside, the risks associated with ATVs and snowmachines are higher than for ordinary motor vehicles. Professionally-piloted air travel on this route appears much safer than ATV and snowmachine travel, particularly when alcohol is involved in ATV and snowmachine travel. Yet, ATVs and snowmachines are the vehicles of choice for overland transportation. To the extent that the road and bridge increases use of these machines on and off the road, particularly when alcohol is involved, then the road and bridge will increase the risk of ATV-related and snowmachine-related injury and death. Iliamna Air Taxi does not fly alcohol to Nondalton, but Northern Air Cargo does to Iliamna. To the extent that the road and bridge increases access to alcohol, then the road and bridge will further increase the risk of alcohol-related death by motor vehicle, hypothermia, homicide and suicide. These increased risks surpass any reduction in the risk of drowning.

Second, these increased risks, and the lack of a 20-year transportation plan, corrupt the framing of and consideration of issues and alternatives. In terms of public safety at least, it is highly likely that greater benefits could be found in alternatives elsewhere than the route from Iliamna to Nondalton.² The fact that such alternatives were not considered demonstrates the problem of attempting to justify this project with no 20-year plan in place.

Third, this road and bridge significantly restricts the ability of Nondalton, Newhalen and Iliamna to exercise local options to prohibit sale and possession of alcohol. None appear to have done so yet. If they were to do so, then the JAMA study indicates that unless all three communities act in concert, any prohibition on sale or importation of alcohol will be ineffective if this road and bridge is built. Therefore, the road and bridge reduce the ability of local people to control their own communities.

II. THE CLAIM THAT THE ROAD WILL IMPROVE HEALTH CARE IS NOT SUPPORTED, AND IS CONTRADICTED BY THE EVIDENCE.

2

The statement of purpose and need asserts that there is a need for a small hospital in Iliamna and an elders home in Nondalton to serve Iliamna, Newhalen and Nondalton. EA at 2. It implies that a road will make these more likely.

Again, the EA fails to substantiate and ignores existing information.

² For example, a bridge from South Naknek to Naknek might produce more benefits. The Existing Conditions and Travel Demand Memoranda show much higher air passenger traffic there than from Iliamna to Nondalton.

A. Population Data Suggest that the Communities Cannot Support a Hospital

According to ADCED's Community Database, all three communities have clinics; hospital care is by flight to Anchorage. Exhibit 6 at 8, 23, 38. The clinics in Nondalton and Newhalen are newly constructed. Id at 23, 38.

Although the EA claims that a road would facilitate a hospital in Iliamna, the EA did not examine whether there is a population sufficient to support a hospital. The ADCED database is helpful. It allows comparison of three situations: (1) Naknek/King Salmon; (2) Dillingham/Aleknagik; and (3) Newhalen/Iliamna/Nondalton. A road connects King Salmon and Naknek. They have a combined population of 1123, and South Naknek's population of 132 would increase this to 1255. Id at 115, 133, 153. All three of these communities have new clinics (id at 122, 140, 160), but together they do not support a hospital. A road connects Aleknagik to Dillingham. They have a combined population of 2546. Id at 72, 100. The Indian Health Service operates Kanakanek Hospital in Dillingham, which serves the region. Id at 80. Newhalen, Iliamna, and Nondalton have a combined population of only 495. Id at 1, 16, 30. Even if Kokhanok (population: 163) and Igiugig (population: 62) (id at 45, 59) were added, the EA's claim that a road would facilitate a hospital in Iliamna is contradicted by the available evidence.

B. Population Data Suggest that the Communities Cannot Support an Elders Home, and that If It were Feasible, It Would Not Be in Nondalton.

With respect to the feasibility of an elders home in Nondalton, the same sort of picture emerges in relation to population. The only such facility I found was recently built in Naknek by the BB Elders Action Group (Chuck Allen, 246-3544). I understood from him that the facility cost \$1.4 million; that this was provided by grant and by the Bristol Bay Housing Authority; that the facility was limited to 10 units by the grantor based on the combined population of 1250 of Naknek/South Naknek/King Salmon; that it serves outlying communities including Nondalton; that it depends substantially on governmental rent subsidies; and that it employs two staff, a live-in manager and a maintenance person. Personal Comm., Chuck Allen. He spoke of Dillingham having a facility providing care to individuals mostly bedridden but did not know the name. According to the ADCED data, Dillingham has the Dillingham Senior Center operated by the city. Id at 81. A telephone call (842-1231) revealed that it is not a residential home.

Like hospitals, the size of the serviceable population for an elders home appears to relate to the feasibility of financing and operating such facilities. The combined

population of Nondalton, Iliamna and Newhalen of 495 appears to be too small to attract the money and support such a facility. Adding the populations of Kokhanok (163) and Igiugig (62) hardly changes the picture, but if such a facility might then be marginally more feasible, it would likely be centrally located in Iliamna/Newhalen, not Nondalton, which is at the extreme edge of the villages near Iliamna Lake.

C. Conclusion about the Health Care Services Issue

The assumptions that that the road will improve the likelihood of a hospital and elders home do not meet FHWA guidance on statement of purpose and need. The assumptions are at most speculative opinion. They fall far short of meeting FHWA guidance for “well-defined, well-established, and well-justified”, “comprehensive and specific”, or “rigorous” statements of purpose and need. The assumptions are not substantiated by the population data. Instead, the data contradict the assumptions and suggest that these communities will continue to have clinics, not a hospital. The data has similar implications about the feasibility of an elders home in Nondalton.

Again, these shortcomings taint the development and consideration of alternatives. In terms of health care at least, greater benefits from millions in transportation funds likely could be found elsewhere, where greater population is at stake, than the route from Iliamna/Newhalen to Nondalton. That is not to say that health care in these communities is not important or should not be improved; it is simply that the data on population suggest that this project will not change health care.

III. THE DATA ON COMPARABLE ROADS INDICATE THAT THIS ROAD AND BRIDGE WILL NOT IMPROVE THE ECONOMY AND MAY HAVE NEGATIVE ECONOMIC IMPACTS. ③

The statement of purpose and need asserts that in Iliamna, Newhalen and Nondalton there is a need to expand and diversify the economies, lower the cost of goods, and improve job opportunities. EA at 2. It says that the lack of jobs has been exacerbated recently by poor commercial fishing in Bristol Bay. *Id.* It claims that a road would “double” the customer base for local businesses, give Nondalton residents an opportunity to take advantage of a “greatly expanded range of employment opportunities”, and reduce costs for passengers and freight. *Id.* It asserts that 25-33 percent of material costs in Nondalton is estimated to be attributable to flight costs but does not identify the source of this estimate. *Id.* (This appears to be based on inflating an unsubstantiated statement by the Mayor of Nondalton that that the cost of transporting many goods from Iliamna to Nondalton would be reduced by 25 percent or more. See EA at 20.)

A. The Data Show that Comparable Roads have Not Improved Economic Conditions.

One would think that if an Iliamna-Nondalton road were likely to improve the economy, such improvements would be seen in comparable situations in Southwest Alaska. Aleknagik is already connected by road to Dillingham. Newhalen is already connected by road to Iliamna. An Iliamna-Nondalton road would comparably connect Nondalton to Iliamna and Newhalen. None of the foregoing communities are connected to the rest of the inter-connected road system. (Newhalen/King Salmon is not comparable because the economy there is so directly involved in commercial fishing and related industry.)

The ADCED database does not support, and contradicts, the EA. The data (it is 1990 census data) follows:

Iliamna

Median household income: \$41,250
Median family income: \$33,750
Percent below Poverty: 12.1%
Percent unemployed: 0.0%
Governmental employment vs. Private employment: 16 vs. 6

Newhalen

Median household income: \$26,250
Median family income: \$18,125
Percent below Poverty: 22.4%
Percent unemployed: 5.5%
Governmental employment vs. Private employment: 37 vs. 15

Nondalton

Median household income: \$21,750
Median family income: \$28,750
Percent below Poverty: 20.3%
Percent unemployed: 42.6%
Governmental employment vs. Private employment: 24 vs. 15

Igiugig

Median household income: \$41,250
Median family income: \$41,250
Percent below Poverty: 0.0%
Percent unemployed: 0.0%
Governmental employment vs. Private employment: 5 vs. 3

Kokhanok

Median household income: \$14,286
Median family income: \$18,125
Percent below Poverty: 53.4%
Percent unemployed: 7.7%
Governmental employment vs. Private employment: 29 vs. 7

Dillingham

Median household income: \$44,083
Median family income: \$47,857
Percent below Poverty: 9.5%
Percent unemployed: 6.7%
Governmental employment vs. Private employment: 290 vs. 551

Aleknagik

Median household income: \$21,875
Median family income: \$23,750
Percent below Poverty: 28.8%
Percent unemployed: 14.3%
Governmental employment vs. Private employment: 33 vs. 15

Source: ADCED data (Exhibit 6 at 5, 20, 35, 49, 63, 77, 104)

1. The Data Show that Comparable Remote Roads Have Not Led to Long-term Improved Income in Aleknagik and Newhalen.

One would think that if comparable remote roads have had long-term beneficial economic effects, then those effects would show up in the income of residents of Aleknagik and Newhalen.

However, the data suggests otherwise. Residents of Iliamna, Igiugig and Dillingham had significantly higher household and family incomes than residents of Newhalen, Nondalton, Kokhanok, and Aleknagik. Despite roads which connect Aleknagik to Dillingham and Newhalen to Iliamna, incomes of Aleknagik and Newhalen residents are comparable to those of Nondalton, not to Dillingham or Iliamna. Thus, the data contradict any inference that the proposed road will have a beneficial impact on income in Nondalton.

2. The Data Show that Comparable Remote Roads do Not Improve Job Opportunities of Local Residents.

Second, one would think that if comparable remote roads have expanded, diversified or increased job opportunities for local residents, then those effects would show up in the employment of local residents.

Again, the data suggests otherwise. Most of the employed residents of Aleknagik, Iliamna, Newhalen, Kokhanok, Igiugig, and Nondalton are in government, not the private sector, while in Dillingham, most employment is in the private sector. The roads connecting Aleknagik to Dillingham and Newhalen to Iliamna do not appear to have created a ratio of governmental-to-private-sector employment of Aleknagik, Iliamna and Newhalen residents that is different than that which occurs for Nondalton residents. Thus, the data contradicts the assertion that the proposed road will expand or diversify the economy for local residents.

The only precise economic claim in the EA and its appendices is that the road and bridge project could lead to several, short-term, local, construction jobs and will create one state-salaried road maintenance position in ADOT&PF. EA at B-46. The latter of course is subject to legislatively approved budgets. In short, at the cost of several million dollars, the road and bridge may create one permanent job in ADOT&PF, but the data indicate that the project will not increase private sector employment for local residents.

3. The Data Show that Comparable Remote Roads do Not Improve Poverty Levels.

Third, one would think that if comparable roads had long-term economic benefits, then those benefits would show up in reduced poverty levels in Aleknagik and Newhalen. That is not the case.

Aleknagik, Newhalen, Kokhanok and Nondalton all have poverty levels substantially higher than those of Iliamna, Dillingham and Igiugig. In Aleknagik, Newhalen, Kokhanok and Nondalton, poverty levels are from 20 to 53 percent. In Iliamna, Dillingham and Igiugig, poverty levels are from 0 to 12 percent. The comparable roads are irrelevant to this picture. Aleknagik and Newhalen have high poverty, despite roads connecting them to communities of lower poverty and higher employment. Igiugig has low poverty, despite the absence of such a road. Nondalton and Kokhanok are high, despite the absence of such roads. In short, the data indicate that such roads are irrelevant to poverty.

4. The Data Show that Comparable Remote Roads Do Not Lead to Reduced Unemployment of Local Residents.

Fourth, one would think that if comparable roads have long-term positive economic benefits for local residents, then those benefits would show up in lower unemployment rates. Again, this is not the case.

Again, the data show that remote roads in these circumstances are irrelevant to local unemployment rates. Residents of Aleknagik and Nondalton have unemployment rates far above the 1990 national average, while those of Iliamna, Newhalen, Dillingham, Igiugig, and Kokhanok have unemployment rates comparable to or below national average. Again, the existing roads seem irrelevant to this picture. Aleknagik was high, despite its connection to Dillingham, which had a much lower rate. Nondalton was high, despite the absence of such a road. Newhalen, Igiugig and Kokhanok were at about the national average or below, despite the facts that Newhalen has such a road and that Igiugig and Kokhanok lack such roads.

B. The False Implication that the Road will Lower the Cost of Goods

4

The purported saving in cost of goods appears as specious as the safety issue related to freight. As stated above, the ADCED database and the EA at B-28 tell us that the bulk of freight transportation from Iliamna to Nondalton is already by ground, not air. Therefore, most of the claim that the bridge will reduce the cost of goods (and most of the claim there is a need to do so) is false and amounts to no savings.

Most of the remaining goods that do travel by air from Iliamna to Nondalton do so by Bypass mail, and air taxis would continue this service according to the EA. As shown previously, this Bypass mail moves, Anchorage-Iliamna-Nondalton, by air at \$0.08/lb. With an Iliamna-Nondalton road and bridge, this cargo will still move, Anchorage to Iliamna, at that rate. This is no savings. But, if the recipient in Nondalton travels by road

to pick up the goods or pays someone to transport them to Nondalton, then the road and bridge actually create costs in addition to those of Bypass mail.

Thus, the evidence contradicts the assertion that the road and bridge will substantially reduce the cost of goods.

Finally, nothing from the ADCED database or Parsons Brinkerhoff supports the assertion that transportation of goods from Iliamna to Nondalton adds 25-30 percent to the cost of the goods.

C. The False Savings in Cost of Air Passenger Travel.

A one-way seat on the mail plane (Monday, Wednesday, Friday) between Iliamna and Nondalton costs \$40, and a charter plane (having up to 6 seats) costs \$125 one way. Pers. com., Iliamna Air Taxi. ADOT&PF says the cost of the road will be about \$5.1 million, plus maintenance. Maintenance is estimated at about \$100,000 annually in current dollars across the 75-year life of the roadway and bridge. EA at B-50. In current dollars, the cost of the road is about \$12.6 million, assuming ADOT&PF's cost estimates are correct.

Using Parsons Brinkerhoff's estimate of 67 air passenger round trips between Iliamna and Nondalton annually, the cost of the road and bridge works out to a staggering \$2507 per round trip passenger for 75 years. The purported "savings" are false.

Furthermore, this calculation assumes that all air passengers between Iliamna and Nondalton would opt for the road. In fact, the EA at B-50 states that because air taxis would continue to be contracted for delivery of mail "the mail subsidy would enable winter time low passenger volume air service to continue between Iliamna and Nondalton." Obviously, the more that people continue to use air transport, the greater the cost of this road per user.

D. The Data indicate that the Claim that the Road will Double the Customer Base for Local Businesses is Misleading

5

The basis for and meaning of the claim that the road will effectively double the customer base for local businesses are unclear. The claim appears to rest upon increased access between Iliamna, Newhalen and Nondalton and the fact that linking Nondalton (which has about half the combined population) to Iliamna/Newhalen "doubles" the interconnected population. However, this is not the same as doubling a customer base. To the extent that increased travel occurs by local residents between the three

communities, a shift in the locale of consumer spending may occur, hurt some businesses, and benefit others. It is misleading to call this a doubling of the customer base, when it is only a shift of where money is spent.

To the extent that increased access may be by nonlocal people, the claim that the road will double the customer base assumes that nonlocal people who come to Iliamna (by air) will conduct more business in Iliamna, Newhalen and Nondalton than they would without the road. Nothing in the EA addresses this assumption, and the claim of a doubled customer base appears to be mere conjecture.

However, the ADCED database on business licenses as of January 2000 and population as of December 1999 undermine any claim that the road and bridge will double a customer base. The data, arranged here as business licenses per capita, puts the communities in two groups:

Group 1 – Low Rate of Business Licenses per Capita:

Newhalen (population 178) -- 5 licenses (1 license per 36 residents)
Nondalton (population 224) -- 9 licenses (1 license per 25 residents)
Aleknagik (population 244) -- 12 licenses (1 license per 20 residents)
Kokhanok (population 163) – 8 licenses (1 license per 20 residents)

Group 2 – High Rate of Business Licenses per Capita:

Dillingham (population 2302) – 237 licenses (1 license per 10 residents)
Igiugig (population 62) – 14 licenses (1 license per 4 residents)
Iliamna (population 93) -- 46 licenses (1 license per 2 residents)

Source: ADCED data (Exhibit 6 at 11-13, 27, 41, 55-56, 69, 84-95, 110-111).

Although business licenses do not equate to business activity, one would think that if roads that connect villages to business centers increase the “customer base” then there would be an increase in the per capita rate of business licenses in villages. However, the data do not support that assumption. Instead, the data undermine it.

Newhalen and Aleknagik, which are road-connected respectively to Iliamna and Dillingham, have much lower rates of business licenses per capita than does Igiugig, which is not road-connected to any community. Nondalton, Kokhanok, and Aleknagik have similar rates of licenses per capita, although Nondalton and Kokhanok are not connected by road to another community, but Aleknagik is connected to Dillingham.

Thus, the data indicate that roads from business centers to remote villages at best have no effect, or at worst draw business (and business licenses) into the business centers, rather than creating business (and business licenses) in the remote villages.³

E. ADOT&PF's Argument that the Road Should be Built because of a Poor Commercial Fishing Season is Unsupported by the Employment Data

6

Finally, the statement of purpose and need asserts that the lack of jobs has been exacerbated recently by poor commercial fishing in Bristol Bay. What puzzles me about this is the ADCED data. Although ADCED's general descriptions of Iliamna, Nondalton, and Newhalen are that commercial fishing is a major source of income, the ADCED database shows that no Iliamna residents are employed in commercial fishing, that no Newhalen residents are employed in commercial fishing, and that either none or two Nondalton residents are employed in commercial fishing. Exhibit 6 at 6, 21, 36. The implication that the road is somehow justified because of a poor commercial fishing is unsupported by the ADCED database.

F. Conclusion about the Economic Issue

Again, the assumptions that the road will expand and diversify the economy, lower the cost of goods, improve job opportunities and double the customer base are not supported by the data from ADCED and Parsons Brinkerhoff and do not meet FHWA guidance for a "well-defined, well-established, and well-justified", "comprehensive and specific", or "rigorous" statement of purpose and need. In fact, those claims are frequently contradicted. Comparable roads to Aleknagik and Newhalen do not show benefits in reduced poverty levels or unemployment, or in increased income, job opportunities and diversification. Once again, this taints the development and consideration of alternatives.

³ In the lower-48 states, as a general matter rural communities have declined. Although many factors probably contribute to this, the consolidation of commerce, production of goods and services, and employment into commercial centers has been contemporaneous with improved roads. ADOT&PF and FHWA are in a better position than the public to know the extent to which this is a correlation or a causal relationship. Here, where Iliamna is the commercial center, ADOT/PF and FHWA should explain why the same sort of decline will not occur, probably to Nondalton, and whether the data indicates that Newhalen, which has the lowest rate of business licenses, may already be suffering the effects of consolidation.

7

IV. THE CLAIM THAT THE ROAD WILL CONSOLIDATE GOVERNMENT SERVICES AND MAKE THEM MORE EFFICIENT AND CONVENIENT SHOULD IDENTIFY WHICH SERVICES ARE LIKELY TO BE CONSOLIDATED AND WHICH FACILITIES AND JOBS LOST.

The statement of purpose and need asserts that the road will make government services more efficient in that “governmental facilities at all levels could be consolidated”. EA at 2. The EA does not identify what facilities, services and jobs might be consolidated, what savings might be achieved, and what jobs and facilities will cease.

According to the ADCED database, government accounts for a substantial percentage of the employment in the three communities.

	<u>Government Employment</u>	<u>Total Employment</u>	<u>% Government</u>
Iliamna	16	22	73%
Newhalen	37	52	71%
Nondalton	24	39	62%
TOTAL	77	113	68%

Source: ADCED data (Exhibit 6 at 5, 20, 35).

Similarly, capital projects undertaken by government are substantial. Since 1990, governmental investments in capital projects are as follows:

	<u>No. of Projects</u>	<u>Total Cost⁴</u>
Iliamna	27	\$12.786 million
Newhalen	33	\$7.857 million
Nondalton	21	\$15.726 million
TOTAL	81	\$36.365 million (since 1990)

⁴ Nondalton figures, as presented above, include \$4.9 million that ADOT/PF invested in the Nondalton airport in 1992 and 50% of the \$11.580 million cost of the Tazimonia Hydroelectric Project (because Nondalton has about 50% of the population of the three communities). Iliamna and Newhalen figures each include 25% of the \$11.580 million cost of the Tazimonia Hydroelectric Project (because each has about 25% of the population of the three communities). The ADCED database inappropriately puts the Tazimonia project under Newhalen; the project serves the three communities.

Source: ADCED data (Exhibit 6 at 14-15, 28-29, 43-44).

Government appears to be a major sector of the economy and accounts for about 70 percent of the employment and about \$7500 annually per capita in spending for capital projects.

These are small villages. It should be easy to identify the jobs, employees and facilities in the public sector. Because the EA claims that the road will consolidate public facilities, ADOT&PF owes it to these communities to state what governmental jobs, services and facilities (in which much so much capital spending is invested) are likely to be lost. The EA should then explain why the losses are worth the gain of one road maintenance job in ADOT&PF.

Again, the assertion that government services could be consolidated does not meet FHWA's call for "well-defined, well-established, and well-justified", "comprehensive and specific", and "rigorous" statements of purpose and need. Again, the consideration of alternatives is tainted.

8

V. THE CLAIM THAT THE ROAD WOULD ENHANCE EDUCATIONAL SERVICES IS POORLY SUPPORTED

The statement of purpose and need asserts that the road would enhance educational services by reducing the cost of transporting goods and persons related to education and improve their safety. EA at 3. It asserts that some students and staff "travel regularly" between Nondalton and Iliamna/Newhalen. Id.

These assertions are a partial reiteration of purported savings and safety issues related to transport of persons and goods in general, and the reiteration now concerns only educational goods, students and staff. Again, the EA presents no data.

The ADCED database provides the numbers of students and residents employed in "education services". (ADCED database shows no school in Iliamna, which apparently sends students to Newhalen.)

	No. of Students	No. of Residents Employed (education services)
Newhalen/Iliamna	83 (K thru 12)	18 (16 Newhalen; 2 Iliamna)
Nondalton	72 (K through 12)	22

Source: ADCED database (Exhibit 6 at 6, 10, 21, 26, 36, 40).

Given that Parsons Brinkerhoff estimates that the average annual number of round trips between Iliamna and Nondalton is 67, the assertion of "regular travel" by air by these numbers of students and staff is questionable. Intramural travel by air appears low. The EA's claim of efficiency related to school matters is not supported by the data on air travel demand and is further contradicted by the information on travel cost. Although the notes on the scoping meeting at Nondalton reflect an assertion (EA at A-63) that it cost \$2000 to charter a plane to transport a volleyball team from Nondalton to Iliamna, as said, a six-seat charter at Iliamna Air Taxi is \$125 one-way.

Once again, the statement of purpose and need does not meet FHWA guidance calling for "well-defined, well-established, and well-justified", "comprehensive and specific", and "rigorous" statements of purpose and need, and the consideration of alternatives is tainted.

VI. THE CLAIM THAT THE ROAD WILL ALLEVIATE ENVIRONMENTAL PROBLEMS IS POORLY SUPPORTED.

9

The statement of purpose and needs claims that environmental problems -- arising from heavy equipment fording the river and erosion of the existing portion of the road -- will be ameliorated, and that a consolidated land fill may be more likely. EA at 3-4. My previous comments in March showed that heavy equipment fords the river only one trip per year. Regarding repair of erosion occurring on the portion of the road that ADOT&PF built in the early 1980's with FHWA funds before ADOT&PF abandoned the project in 1986 as not cost-effective, my previous comments pointed out that ADOT&PF is legally obligated to maintain what it built. ADOT&PF should simply repair the erosion. Finally, I checked with ADEC on the status of Nondalton's proposed incinerator and landfill project (shown in the ADCED database (Exhibit 6 at 43) as funded at \$697,000). The money is not actually granted. The attached record from ADEC (Exhibit 17) says that there has been no progress and no engineering study; that any grant will be conditioned on Nondalton adopting user fees which Nondalton has declined to do; and that Nondalton cannot afford an incinerator but needs and can afford a new landfill. That is probably is the solution, rather than a multi-million-dollar road and bridge, which makes a consolidated landfill extremely costly, given that all other purported benefits are not supported by the facts.

Again, the statement of purpose and need did not examine existing information or otherwise meet FHWA guidance.

CONCLUSION

Reduced to essentials, FHWA's guidance about NEPA documents is that well-supported statements of purpose and need promote issue identification and reasoned decision-making. They define reasonable, prudent, and practicable alternatives. These enable agencies to consider those which meet a well-reasoned purpose and need at an acceptable cost and level of impact relative to the benefits which will be derived from the project. Therefore, FHWA advises that such statements should be comprehensive and specific, rigorously defined, evolve as information is developed, and utilize as specific data as possible. Mere statements of need and unsupported assertions or benefits are not sufficient. Supporting data must be provided.

Here, the statement of purpose and need does not promote reasoned decision-making. Reduced to essentials, it says that "needs" exist, makes supporting assertions, and purports that certain benefits will occur if a road and bridge is constructed. None of this is supported by data or other documentation, and most of this is unsubstantiated speculation.

Instead, available data and other documents consistently do not confirm, undermine, or contradict the supporting assertions and purported benefits. The evidence indicates that the road and bridge will not promote public safety or health care, will not improve the long-term economy, and will not have any other substantial benefit.

However, the data and other documents reviewed here indicate that the project may actually have negative impacts. Overall public safety is likely to decrease, as the road causes increased risk in several categories of alcohol-related injury and death. The effectiveness of future options of the communities to prohibit sale and importation of alcohol will be reduced. Business and business licenses are likely to consolidate further into Iliamna, to the detriment of Nondalton. Consolidation also may cost government jobs and services, while unemployment and poverty levels are unimproved, and diversification and increased income do not occur.

On balance, even if some marginal benefits eventually can be documented, they will come at an extremely high cost relative to benefits. The costs -- budgetary and negative social, economic and environmental impacts -- do not justify any foreseeable benefits. Alternative uses of the funds should have been examined, particularly given the lack of a long-range transportation plan.

To be legally defensible, the decisions of FHWA, COE and ADOT&PF must be rationally based. This project was found economically unjustifiable in 1976 and again in 1986 after less examination than is contained herein. Based on the information examined here, ADOT&PF and FHWA should acknowledge that this project is now substantially more unjustifiable than it ever has been.

Sincerely yours,

EDGREN & ASSOCIATES, P.C.


Geoffrey X. Parker

attachments

DOT Note: The approximately 200+ pages of attachments are not bound in this document. They are available upon request from DOT.

DOT Responses:

1. Based on data (Anchorage Daily News, 12/15/99) provided by the National Transportation Safety Board and National Safety Council, the EA states that plane crashes are the leading cause of occupational fatalities in Alaska. Regardless of which occupation is the leader in fatalities in Alaska, the Secondary and Cumulative Impacts Study for this project indicates that providing improved overland access will decrease the need for air travel (and water travel) between Iliamna/Newhalen and Nondalton, and as such, any decrease in air and water travel would result in a reduction of potentially serious injuries and accidental deaths. The EA does not base the need for an overland connection between Iliamna/Newhalen and Nondalton on the existing or forecasted passenger air travel demand in this area, as described in the technical memoranda for the Southwest Area Plan.

It is important to note that the reduction of potential injuries and deaths associated with air travel between the communities is only a portion of the identified need for improvement of public safety in the area. Reducing the need for water travel, and vehicle and foot travel over ice during the winter, would also result from the proposal. The study also indicates that the availability of an improved road would lead to increased traffic between the communities and that there may be a short term increase in accidents until the "newness" of the overland connection wears off and residents become familiar with the new system. It is expected that the winter travel vehicle use will move away from ATV and snowmachine use toward the use of cars or trucks.

With regard to alcohol, the need for the area's communities to address alcohol-related issues will continue, with or without a road connection from Iliamna/Newhalen to Nondalton.

This project would provide more reliable and safer overland access across the Newhalen River and Sixmile Lake; thus the Alaska Department of Transportation and Public Facilities (ADOT&PF) and the Federal Highway Administration (FHWA) believe that the improved access provided by the proposed project would in fact, result in an overall increase in public safety.

2. The EA identifies a need for a hospital in Iliamna and an elders home in Nondalton, based on views expressed by the local communities during the planning stage of this proposal. The EA does not claim that the proposed project would improve health care or increase the likelihood of the establishment of these facilities. Rather, the document correctly states that improved overland access would enhance the opportunity for joint regional development and permit facilities of this type and others to provide more centralized services to all the residents of Iliamna/Newhalen and Nondalton.
3. The Secondary and Cumulative Impacts Study discusses the common route for the delivery of goods to the area and documents the difficulties with this existing transport scheme. It also documents the differences between costs of some common

goods at Iliamna versus Nondalton. The costs for most goods are higher in Nondalton and costs of heavier items are substantially higher in Nondalton. Much of the increased costs can be attributed to the movement of goods from Iliamna to Nondalton. The proposed project would eliminate the need for goods to be transferred to and from boat or barge, effectively reducing the number of required transfers by half. It is presumed that the project would also reduce the amount of goods and freight being shipped via air services, since some of those goods could be trucked from Iliamna. It is also assumed that the reduction in the cost of transporting goods to Nondalton would be passed on to the consumer, since with a reliable and safe connection between the communities, Nondalton residents would have the viable option of driving to Iliamna to purchase or pick up goods. In addition, the reduction in the cost of movement of goods from Iliamna to Nondalton could lead to greater competition between providers which in turn could lower the cost of goods in each community.

4. The EA states "Improved overland access would also permit reduction in costs to passengers and freight carriers between Iliamna/Newhalen and Nondalton". This sentence is not intended to imply there would be a savings in cost to air travelers bound for Nondalton, rather that the improved access would provide a cheaper alternative to travelers destined for, and those moving freight to Nondalton.
5. The EA has been changed to clarify the information regarding customer base.
6. The EA states, "This economic problem has been exacerbated in recent years due to the commercial fishing crisis in the Bristol Bay Area". Current ADCED data indicates fishing in Bristol Bay is an important source of income for Iliamna, Newhalen and Nondalton residents and that a total of 38 commercial fishing permits have been issued to Iliamna, Newhalen and Nondalton residents. In addition, three Magnuson-Stevens Act 1997 Fish Disaster Grants have been issued to those three communities. These facts support our statement.
7. The EA states that services "could" be consolidated, not that services "will" be consolidated. ADOT&PF and FHWA believe that the proposed project would provide an enhanced opportunity for services to be consolidated. Please see #3 above.
8. The EA states that the school district would like to improve its ability to transport supplies, materials, students and personnel between Iliamna/Newhalen and Nondalton. Because of the high cost of air travel the school district would like another overland option to provide enhanced secondary programs and competitive opportunities for students. Again, the document does not indicate that the proposed project would in fact enhance educational services, rather, that the improvement would provide greater opportunities to the district for enhanced service delivery.
9. ADEC and ADF&G have expressed concern about the possibility of environmental damage by equipment fording the Newhalen River and have requested that

ADOT&PF use the development of this project as an opportunity to address some erosion problems currently occurring at a number of locations adjacent to the existing roadway. The proposed project would eliminate the need for heavy equipment to ford the river and as a result, should eliminate environmental degradation associated with the current practice of fording. ADOT&PF is committed to designing the proposed project to alleviate the current erosion and drainage problems along the existing road. Regulatory permits have been obtained to fix these problems and construct the proposed project. Numerous conditions are included in those permits (see Appendix C) including ADEC and F&G approval of the Departments erosion and sediment control plan.

With regard to the City of Nondalton's plan for a new landfill and/or new landfill and incinerator, ADEC has sent a new Village Safe Water grant offer to the Mayor of Nondalton that once signed, will program funds to locate a site, design and construct a solution to the existing landfill problem.

APPENDIX E

COE

INTERAGENCY WORKING AGREEMENT
TO
INTEGRATE SECTION 404 AND RELATED PERMIT REQUIREMENTS SH
INTO THE NATIONAL ENVIRONMENTAL POLICY ACT

JC/MT
SWILM
All Analysts

I. INTRODUCTION

This Agreement integrates the Section 404(b)(1) Guidelines and other 404 related permitting and certification requirements for compliance with NEPA. The signatories to this Agreement are committed to integrating Section 404 of the Clean Water Act and NEPA in the development of applicable Federal-aid Highway projects. The signatories are committed to ensuring the earliest possible identification and consideration of environmental concerns pertaining to waters of the U.S., including wetlands, within the State of Alaska in the planning, design and construction of these Federal-aid Highway projects. The goal is to improve interagency cooperation and consultation at all levels of government throughout the process.

Consistent with the intent of the 404(b)(1) Guidelines regarding project mitigation sequencing, the signatories place high priority on the avoidance of adverse impacts to the waters of the U.S. within Alaska. Whenever impacts will occur, minimization of those impacts will be pursued and unavoidable impacts will be mitigated in compliance with Federal and State requirements.

II. BACKGROUND & PURPOSE

In an agreement dated May 1, 1992, the U. S. Department of Transportation, the U. S. Department of Army-Civil Works, and the U. S. Environmental Protection Agency adopted as agency policy (1) improved inter-agency coordination and (2) integration of the National Environmental Policy Act (NEPA) and the Clean Water Act, Section 404 procedures.

On December 17, 1992, the U. S. Army Corps of Engineers (COE), Alaska District; the Federal Highway Administration (FHWA), Alaska Division; and the Alaska Department of Transportation and Public Facilities (ADOT&PF) signed an "accord" to merge the elements of the process for obtaining individual 404 permits and the NEPA process for Federal-aid highway projects within the State of Alaska, the "merged process."

The purposes of this Interagency Working Agreement (Agreement), as detailed below, are to refine the merged process and to include additional State and Federal resource and regulatory agencies in the merged process. The signatories to this Agreement include the FHWA, and ADOT&PF,

herein after referred to as the Project Sponsors, and the following regulatory/resource agencies, herein after referred to as the Agencies: the COE, the U.S. Environmental Protection Agency (EPA), the U. S. Fish and Wildlife Service (F&WS), the National Marine Fisheries Service (NMFS), the Alaska Department of Fish and Game (ADF&G), the Alaska Department of Environmental Conservation (ADEC), the Alaska Department of Natural Resources (ADNR), and the Division of Governmental Coordination (DGC).

This Agreement incorporates a procedure for Agency interaction and involvement in the merged process. It provides a mechanism by which the Agencies can ensure that environmental concerns are identified at an early stage in project development, and that 404 and related permit requirements are addressed in the development of projects through the NEPA process. This process does not include any formal or prescribed Agency review of approved draft or final Environmental Impact Statements, but should serve to complement those reviews. The intent of the process is to encourage early substantive participation by the Agencies and preclude the routine revisiting of decisions that have been agreed to early in the process.

III. GOALS

The goals of the signatories to the merged process are to:

- A. Identify and resolve environmentally sensitive issues early in the process and in a timely manner.
- B. Achieve a more efficient and clear decision making process.
- C. Facilitate interagency coordination, cooperation and communication.
- D. Increase protection and preservation of valuable natural resources.
- E. Facilitate early identification and consideration of reasonable alternatives.
- F. Facilitate more realistic and predictable projects and schedules.

IV. APPLICABILITY

- A. This agreement applies to Federal-aid Highway projects within the State of Alaska, including marine highway facilities, that require an individual Section 404 permit from the COE and are processed with either an Environmental Assessment (EA) or an Environmental

Impact Statement (EIS). Consistent with the need for a Section 404 permit, this agreement is limited to projects involving excavation and discharge of dredged and fill material in waters of the United States, including wetlands, within the State of Alaska

- B. Agreement applicability may be further limited by funding constraints and will only apply to projects for which Agencies have adequate funding to participate. Agency participation in any or all parts of this Agreement is subject to resource constraints. Agency non-participation due to resource constraint is not to be construed as non-participation by choice.
- C. ADOT&PF will give priority to State Agencies when services are required for project-related activities (e.g., inventories, surveys, mitigation planning and project monitoring). Funding for these services will be provided for under separate agreement (i.e. reimbursable services agreement or other arrangement).
- D. Signatories to this Agreement acknowledge that other permits and approvals will be required for Federal-aid Highway projects to proceed. This Agreement is intended to broaden, clarify and strengthen the existing merged process referenced in Section I by incorporating, where appropriate, the activities, actions and/or interests of additional Federal and State Agencies pursuant to Section 404 and NEPA (33 U.S.C. 1344, 42 U.S.C.4371 et seq,).
- E. Agency participation in this process does not imply endorsement of a highway project. Nothing in this Agreement or its appendices is intended to diminish, modify or otherwise affect the statutory or regulatory authorities, or the appeal processes of the Agencies. Further, nothing in this Agreement shall be construed as altering, or in any way limiting, any Agency's ability or responsibility to act in accordance with all applicable Federal, State and local laws and regulations.
- F. The Division of Governmental Coordination administers the coastal management program. Participants in that program include the state resource agencies and affected coastal resource districts. The state resource agencies are signatories to this agreement. DGC's signature enables and conveys full standing to the affected coastal resource districts to participate in this agreement in the same manner as other signatories. Nothing in this agreement replaces the coastal consistency review process or prejudices the outcome of the consistency review.

- G. This agreement in no way obligates any Agency to the expenditure of agency resources.
- H. The signatories agree that the merger time frames need to be flexible to accommodate unexpected contingencies or emergencies which impact any participating Agency.

V. IMPLEMENTATION PROCEDURES

A. Meetings

ADOT&PF will conduct four meetings annually. The annual Statewide meeting will be held in Anchorage to review the ADOT&PF's State Transportation Improvement Program (STIP), and other information on prospective highway projects and to evaluate this Agreement. Following the Statewide meeting, a meeting will be held to evaluate specific projects in each of the three ADOT&PF regions.

1. Statewide Meeting

The Statewide meeting will provide the Agencies an overview of all projects in ADOT&PF's program, including Categorical Exclusions, with 404 impacts. An overview and agenda will be provided by ADOT&PF in advance of the meeting. This meeting is intended to provide information to Agency representatives regarding the status of projects in ADOT&PF's work program that may require a 404 permit.

To the extent practical, ADOT&PF will provide information on project scope, potentially impacted resources, and other pertinent data that will allow the Agencies to identify inventory needs and establish project and related resource allocation priorities. Meeting topics will include project priorities, Agency resource allocation concerns and related funding considerations. Monitoring and evaluation of the Agreement will also occur at this meeting (See Section X); each signatory will designate a representative with authority to speak for them. It is intended that the representatives include the interagency body that developed the Agreement.

A principal task of the Statewide meeting will be to assess the STIP and make preliminary findings on the projects that will be processed according to the Agreement. As stated previously, Agreement

applicability will be limited to FHWA projects requiring individual section 404 permits and an EA or an EIS for which adequate funding is available. Taking into consideration resource and funding concerns, Statewide meeting participants will make initial determinations as to the projects that will be covered by this Agreement.

At the initial Statewide meeting after this Agreement becomes effective, projects on which the NEPA process is underway will be reviewed to determine which projects should be included in the merged process. For those projects included, the signatories will establish how the selected projects will be melded into the Agreement. The signatories will determine how to accommodate the analysis required by the earlier stages of the Agreement and the appropriate concurrence (see Concurrence p.6) to be obtained prior to proceeding to the next NEPA stage or phase.

2. Regional Meetings

The regional meetings will be held to provide an opportunity for ADOT&PF staff knowledgeable about specific projects to share detailed information and concerns with their field-level counterparts, as well as give Agencies the opportunity to identify specific concerns and provide recommendations on projects. The information provided at these meetings will be in sufficient detail to allow the Agencies to make decisions as to the extent of their participation and level of involvement on specific projects. ADOT&PF will discuss the proposed level of NEPA documentation for Agency comment. Regional meetings are not intended to eliminate the need for project specific meetings and/or field reviews to discuss specific issues or permit concerns.

In unusual circumstances, priorities may dictate that projects are advanced or delayed. When new projects that may require an individual Section 404 permit are either added to or advanced in the program, ADOT&PF will notify all Agencies by letter. Agency field personnel will be provided detailed project information to allow them to make a determination regarding the need for project involvement. Project meetings will be held if necessary.

B. Process

Included in this Agreement are two Process Flow Diagrams (Appendix B) which illustrate the Section 404/NEPA merged process for EAs and EISs. These diagrams outline the roles and responsibilities of the signatories throughout the project development process -- from project inception through actual construction of the project -- and include responsibilities and opportunities for project monitoring. The several phases identified in the flow diagrams are defined in Appendix C. The time frame for each phase is also identified.

C. Concurrence Points

Within the merged process, there are up to three concurrence points specifically referenced in the Process Flow Diagrams (Appendix B). At each point, ADOT&PF will request written concurrence from the Agencies on a specific stage of the project. These concurrences will be documented for future reference of the good faith effort to reach agreement. However, concurrence does not limit Agency ability to condition or deny permits, based on statutory/regulatory authorities, at a later date.

Written concurrences will be sought on:

1. Project purpose and need, as specified in 40 CFR Parts 1500-1508 (Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act), to be presented in the DEIS/EA;
2. Alternatives to be carried forward for the DEIS/EA with the avoidance, minimization and preliminary mitigation requirements of each discussed; and
3. Preferred alternative including a proposed mitigation plan, when required, for the FEIS/FONSI.

In the case of EA's, where only one build alternative will be evaluated, written concurrence will be sought on items 1 and 3.

The signatories agree not to revisit issues considered as part of previous concurrences unless:

1. There is new information bearing on project impacts;

2. There is a change to the project bearing on project impacts;
3. There is a change in the environment within the project area bearing on project impacts;
4. There is a change in legislation or regulations, related to the project, requiring a reevaluation.

It is recognized that non-participation by an Agency results in there being no formal concurrence or non-concurrence and consequently may result in issues being addressed later in the process.

It is incumbent on ADOT&PF to advise the Agencies of possible changes in impacts resulting from the above items. It is incumbent upon an Agency to notify ADOT&PF whenever they become aware that relevant changes have occurred.

VI PROGRAM/PROJECT MEETINGS & FIELD REVIEWS

The signatories agree that a 30-calendar day advance notice will be provided for all Statewide and Regional program/project meetings called through the Agreement (unless by consensus of the agencies an earlier date is agreed to). Any signatory can request that ADOT&PF convene a meeting to discuss a program or project issue.

These meetings will be organized and chaired by the ADOT&PF representative(s). ADOT&PF will be responsible for providing facilities, taking meeting notes and distributing a meeting summary.

This Agreement does not cover nor preclude interagency meetings between or among two or more signatories to discuss specific project concerns.

VII PARTICIPATION

If any Agency does not participate in all or part of the early planning/scoping phase or subsequent phase of project development, they will notify ADOT&PF, who will acknowledge the notification in writing. The project may proceed to the next stage or phase of project development without prejudice. If an Agency does not participate, there will be no formal concurrence or nonconcurrence. However, nonparticipation by choice will be interpreted to mean that, based on the information provided by the project sponsors, it appears that regulatory and resource issues can be resolved at the next stage or phase of development. Non-participation at an early stage does not preclude full participation at later stages. However, project issues will

not be reviewed retroactively unless one of the circumstances described on page 6 occur. Non-participation due to resource constraints will not be construed as non-participation by choice.

VIII CONCURRENCE/NONCONCURRENCE

A concurrence point is a point within the merged Section 404/NEPA process where ADOT&PF requests formal concurrence and the Agencies provide concurrence, nonconcurrence or elect not to participate at that stage. The intent of the concurrence points in the process is to encourage early substantive participation by the Agencies and preclude the routine revisiting of decisions that have been agreed to early in the process.

A. Timeliness:

Agencies will provide concurrence or nonconcurrence within 50 calendar days after their receipt of requests. Longer review schedules may be negotiated when needed for complex projects.

B. Concurrence is a written determination that:

1. The information to date is adequate for the stage under development; and
2. The project may proceed to the next stage without modification.

C. Nonconcurrence is a written determination that:

1. The information to date is not adequate to address the stage under development;
2. The potential adverse impacts of the project are unacceptable; or
3. The project should be modified to reduce the impacts.

Agencies agree to provide a detailed explanation for the basis of each nonconcurrence, identifying the issue and proposed resolution when possible. The signatories agree to attempt to resolve issues causing nonconcurrence, and to try to do so informally before entering the dispute resolution process described below and detailed in Appendix A .

IX DISPUTE RESOLUTION

The purpose of this dispute resolution procedure is to provide a process to resolve disagreements among signatory

agencies. This process is not intended to usurp or bypass existing signatory internal appeal processes or authority. It does not obligate any signatory to accept a decision that is contrary to its authority.

Dispute resolution procedures, as described in Appendix A, may be initiated upon request of any signatory. Reasons may include:

- A. Unresolved written nonconcurrence,
- B. Lack of response within agreed-upon concurrence point time limits, and
- C. Departure from the Agreement process regarding concurrence points.

X AGREEMENT EVALUATION AND MODIFICATION

Modification to this Agreement or to the process may be proposed at any time by any of the signatories. Modifications or revisions to the Agreement will be made following consensus and must be signed by the appropriate management official of each signatory.

A. ANNUAL STATEWIDE MEETING

At the annual meeting held in Anchorage the signatory representatives may consider, recommend, and, as appropriate, take action regarding:

- a. Minor editorial corrections;
- b. Substantive proposals for improvements;
- c. Ways to monitor and measure the effectiveness of the agreement;
- d. Changes to the Agreement to reflect monitoring results;
- e. Continuation of monitoring and evaluation;
- f. Effectiveness of funding process;
- g. Effectiveness of merger process; and
- h. Other changes proposed by a signatory.

B. PROCESSING REVISIONS

Signatory representatives attending the annual meeting will:

- a. Present minor revisions to the Agreement to their agencies for concurrence.
- b. For more substantive issues, recommend a process for obtaining the consensus of all signatories to amend the Agreement. This may require reconvening

the interagency body that developed the Agreement.

XI. EFFECTIVE DATE AND TERMINATION

This Agreement becomes effective when signed by all participating Agencies. Any signatory may choose to withdraw from this agreement upon 30-day written notice to all other signatories. This Agreement will remain in effect for two years at which time it will be reassessed and the signatories will decide to extend, modify or terminate the Agreement. In addition, at the annual meeting, the effectiveness of this Agreement will be reviewed and assessed and the Agreement modified if agreed by a consensus of the signatories.

for Marc Van Dongen, LTC *Acting DE*
District Engineer
U.S. Army Corps of Engineers, Alaska District

17 Jun 96
Date

Richard Holt
Director, Alaska State Office
U.S. Environmental Protection Agency

2/19/97
Date

Robert E. Ruby
Division Administrator
Federal Highway Administration, Alaska Division

6-3-96
Date

Regional Director
U.S. Fish and Wildlife Service,

Date

for: Itho J. Zimm
Regional Director
National Marine Fisheries Service,

9/4/96
Date

Joseph L. Perkins
Commissioner
Alaska Department of Transportation & Public Facilities

6/6/96
Date

Frank Au
Commissioner
Alaska Department of Fish and Game

3-28-97
Date

[Signature]
Commissioner
Alaska Department of Natural Resources

6/11/97
Date

[Signature]
Commissioner
Alaska Department of Environmental Conservation

8/19/96
Date

Dianne E. Mayer
Director
Division of Governmental Coordination

6-17-96
Date

APPENDIX A

DISPUTE RESOLUTION

I. INTRODUCTION

The purpose of this dispute resolution procedure is to provide a process to resolve disagreements among signatory agencies. The intent is to expeditiously resolve disputes at the field or project level of the organizations through consensus. Facilitation or mediation can be used to augment the procedures described below.

II. LEVELS OF DISPUTE RESOLUTION

These levels of dispute resolution reflect current general processes for resolving disputes.

A. Primary Dispute Resolution

1. Primary dispute resolution is agency field or project level staff and/or management-level coordination between parties to resolve outstanding issue(s).
2. Primary dispute resolution can be initiated by any signatory agency. ADOT&PF will coordinate the meeting.
3. Agencies will make all reasonable efforts to resolve disputes at the primary level before secondary dispute resolution is initiated.

B. Secondary Dispute Resolution

1. If the parties agree that the Primary dispute resolution process has been exhausted, a signatory or their designee can initiate the secondary dispute resolution process.
2. At the signatory's request, ADOT&PF will notify, in writing, the signatories or their designees of a meeting to be held within 15 days to resolve the issue(s).
3. The notice from ADOT&PF will include a statement of the issue(s) and any pertinent background material.
4. The written conclusion of the formal process will be distributed to all signatory agencies.

AGENCY	PROGRAM DEVELOPMENT	PROJECT DEFINITION	SCOPING	ALTERNATIVES DEVELOPMENT
FHWA	<p>Participate with ADOT/FF's planning and program development process.</p> <p>Participate in annual program review meeting.</p>	<p>Review NEPA - purpose & need for NEPA and 404 purposes.</p> <p>Coordinate ADOT/FF resource agency interaction if necessary</p> <p>Concur in type of document</p>	<p>Participate in interagency meetings and field reviews.</p> <p>Review and comment on project purpose & need</p>	<p>Participate in evaluation of alternatives and selection of the alternative to be carried forward.</p>
ADOT/FF	<p>Develop transportation plan & program</p> <p>Schedule and participate in annual program review meeting</p>	<p>Develop and transmit purpose & need.</p> <p>I.D. parallel processes, procedures, permits</p> <p>Review and evaluate comments on P&N</p> <p>Propose document type</p> <p>Prepare NEPA for publication</p> <p>Request initial species list from FWS and NMFS.</p>	<p>Develop initial range of alternatives for consideration.</p> <p>Initiate public and interagency meetings and field reviews as necessary.</p> <p>Request concurrence in P&N</p> <p>Provide information as requested</p>	<p>Analyze alternatives & select alternative to carried forward.</p> <p>*Request concurrence in alternative to be carried forward.</p> <p>Provide information as requested</p>
COE	<p>Participate in annual program review meetings.</p> <p>Identify projects likely to require individual permits.</p> <p>Identify preliminary concerns and recommendations for specific projects.</p>	<p>Evaluate P&N and other data.</p> <p>Review and comment on permit needs.</p> <p>I.D. parallel processes, procedures, permits</p> <p>Provide input on type of NEPA document</p> <p>Indicate level of coordination and involvement desired.</p>	<p>Participate in public and interagency meetings and field reviews as necessary.</p> <p>Provide technical assistance</p> <p>Identify issues to be addressed</p> <p>* Respond to request for concurrence in P&N.</p>	<p>Participate in evaluation of alternatives and selection of the alternative to be carried forward.</p> <p>* Respond to request for concurrence in alternative to be carried forward.</p>
FWS NMFS EPA	<p>Participate in annual program review meetings.</p> <p>Identify projects likely to require individual permits.</p> <p>Identify preliminary concerns and recommendations for specific projects.</p>	<p>Evaluate P&N and other data.</p> <p>Review and comment on permit needs.</p> <p>I.D. parallel processes, procedures, permits</p> <p>Provide input on type of NEPA document</p> <p>Indicate level of coordination and involvement desired.</p> <p>FWS & NMFS - Provide species list</p>	<p>Participate in public and interagency meetings and field reviews as necessary.</p> <p>Provide technical assistance</p> <p>Identify issues to be addressed</p> <p>* Respond to request for concurrence in P&N.</p>	<p>Participate in evaluation of alternatives and selection of the alternative to be carried forward.</p> <p>* Respond to request for concurrence in alternative to be carried forward.</p>
DEC DGC DF&G DNR	<p>Participate in annual program review meetings.</p> <p>Identify projects likely to require individual permits.</p> <p>Identify preliminary concerns and recommendations for specific projects.</p>	<p>Evaluate P&N and other data.</p> <p>Review and comment on permit needs.</p> <p>I.D. parallel processes, procedures, permits</p> <p>Provide input on type of NEPA document</p> <p>Indicate level of coordination and involvement desired</p>	<p>Participate in public and interagency meetings and field reviews as necessary.</p> <p>Provide technical assistance</p> <p>Identify issues to be addressed</p> <p>* Respond to request for concurrence in P&N.</p>	<p>Participate in evaluation of alternatives and selection of the alternative to be carried forward.</p> <p>* Respond to request for concurrence in alternative to be carried forward.</p>

* Indicates concurrence point - no further activities until concurrence received from all agencies (concurrence is defined in Section VIII of the Agreement)

* Affected coastal district will participate under authority provided by DGC signature

AGENCY	PREPARE ENVIRONMENTAL ASSESSMENT	APPROVED EA	FINDING OF NO SIGNIFICANT IMPACT	CONSTRUCTION & MONITORING
FHWA	Ensure adequacy of draft EA Ensure other agencies have an opportunity to comment	Approve EA Circulate approved EA	Receive notice that 404 permit issued approve FONSI	Ensure compliance with mitigation and permit conditions. Participate in pre-construction and monitoring meetings and field reviews.
ADOT/PF	Coordinate review of draft EA Finalize technical reports Prepare/submit Section 404 permit application In Coastal Zone - Prepare & transmit CPQ, all permit applications and Consistency Determination to DGC Outside Coastal Zone - submit permit applications to individual agencies Finalize EA and submit for approval	Prepare for joint public hearing, if needed. Hold joint public hearing. Review comments on EA and public hearing. Ensure COE receives all comments.	Prepare and submit FONSI for approval	Arrange for pre-construction and monitoring meetings. Construct project incorporating all mitigation measures agreed to. Monitor and maintain mitigation measures as required.
COE	Circulate permit application to resource agencies. Review and comment on draft EA.	Publish 404 Public Notice Prepare for joint public hearing if needed Review and comment on EA Review comments on public notice and public hearing.	Receive 401 certification Receive coastal zone consistency determination Complete 404(b)(1) determination Final 404 permit decision Announce decision	Participate in pre-construction and monitoring meetings and field reviews.
FWS NMFS EPA	Review and comment on draft EA	Review and comment on EA and 404 permit application (copies to both ADOT/PF and COE)		Participate in pre-construction and monitoring meetings and field reviews.
DEC DGC DF&G DNR	Review and comment on draft EA DGC - Upon receipt of complete application packet, commence coastal zone consistency review	Review and comment on EA and 404 permit application (copies to both ADOT/PF and COE) DEC - 401 Certification DGC - complete coastal zone consistency review DF&G - Fish habitat or Special Area Permit Other required state permits		Participate in pre-construction and monitoring meetings and field reviews.

Indicates concurrence point - no further activities until concurrence received from all agencies (concurrence is defined in Section VIII of the Agreement)

Affected coastal district will participate under authority provided by DGC signature

AGENCY	PROGRAM DEVELOPMENT	PROJECT DEFINITION	SCOPING
FHWA	Participate with ADOT/PF's planning and program development process. Participate in annual program review meeting.	Review evaluate purpose & need for EIS and 404 purposes. Coordinate ADOT/PF resource agency interaction if necessary Concur in type of document	Participate in interagency meetings and field reviews. Request NEPA cooperating agencies Review and comment on project purpose & Need
ADOT/PF	Develop transportation plan & program Schedule and participate in annual program review meeting	Develop and transmit purpose & need. I.D. parallel processes, procedures, permits Review and evaluate comments on P&N Propose document type Prepare NOI for publication Request initial species list from FWS and NMFS.	Develop initial range of alternatives for consideration. Initiate public and interagency meetings and field reviews as necessary. Request concurrence in P&N Provide information as requested
COE	Participate in annual program review meetings. Identify projects likely to require individual permits. Identify preliminary concerns and recommendations for specific projects.	Evaluate P&N and other data. Review and comment on permit needs. I.D. parallel processes, procedures, permits Provide input on type of NEPA document Indicate level of coordination and involvement desired.	Participate in public and interagency meetings and field reviews as necessary. Review initial alternatives Provide technical assistance Identify issues to be addressed <u>* Respond to request for concurrence in P&N.</u>
FWS NMFS EPA	Participate in annual program review meetings. Identify projects likely to require individual permits. Identify preliminary concerns and recommendations for specific projects.	Evaluate P&N and other data. Review and comment on permit needs. I.D. parallel processes, procedures, permits Provide input on type of NEPA document Indicate level of coordination and involvement desired.	Participate in public and interagency meetings and field reviews as necessary. Review initial alternatives Provide technical assistance Identify issues to be addressed <u>* Respond to request for concurrence in P&N.</u>
DEC **DGC DF&G DNR	Participate in annual program review meetings. Identify projects likely to require individual permits. Identify preliminary concerns and recommendations for specific projects.	Evaluate P&N and other data. Review and comment on permit needs. I.D. parallel processes, procedures, permits Provide input on type of NEPA document Indicate level of coordination and involvement desired.	Participate in public and interagency meetings and field reviews as necessary. Review initial alternatives Provide technical assistance Identify issues to be addressed <u>* Respond to request for concurrence in P&N.</u>

* Indicates concurrence point - no further activities until concurrence received from all agencies (concurrence is defined in section VIII of the Agreement)

** Affected coastal district will participate under authority provided by DGC signature

AGENCY	ALTERNATIVES DEVELOPMENT	PREPARE DRAFT EIS	APPROVED DRAFT EIS
FHWA	Participate in development of full range of alternatives. Participate in selection of alternatives to be carried forward	Ensure adequacy of pre-draft EIS Ensure other agencies have an opportunity to comment	Approve draft EIS Circulate approved DEIS
ADOT/PE	Develop full range of alternatives Analyze alternatives & select alternatives to be carried forward. Identify preliminary preferred alternative if known Request concurrence in alternatives to be carried forward. Provide information as requested	Coordinate review of pre-DEIS Finalize technical reports Prepare/submit draft Section 404 permit application Finalize DEIS and submit for approval	Prepare for joint public hearing, if needed. Hold joint public hearing. Review comments on DEIS and public hearing. Ensure COE receives all comments. Propose preferred alternative and request concurrence.
COE	Participate in development of full range of alternatives. Review and comment on alternatives. <u>* Respond to request for concurrence in alternatives to be carried forward.</u>	Circulate draft permit application to resource agencies. Review and comment on pre-draft EIS. Issue draft 404 Public Notice for inclusion in DEIS.	Prepare for joint public hearing if needed Review and comment on DEIS Review comments on public notice and public hearing. <u>* Respond to request for concurrence in preferred alternative.</u>
FWS NMFS EPA	Participate in development of full range of alternatives. Review and comment on alternatives. <u>* Respond to request for concurrence in alternatives to be carried forward.</u>	Review and comment on pre-draft EIS	Review and comment on DEIS and draft 404 application (copies to both ADOT/PE and COE) <u>* Respond to request for concurrence in preferred alternative.</u>
DEC DGC DF&G DNR	Participate in development of full range of alternatives. Review and comment on alternatives. <u>* Respond to request for concurrence in alternatives to be carried forward.</u>	Review and comment on pre-draft EIS	Review and comment on DEIS and draft 404 application (copies to both ADOT/PE and COE) <u>* Respond to request for concurrence in preferred alternative.</u>

Indicates concurrence point - no further activities until concurrence received from all agencies (concurrence is defined in section VIII of the Agreement)

* Affected coastal district will participate under authority provided by DGC signature

AGENCY	PREPARE FINAL EIS	APPROVED FINAL EIS	ROD PERMIT ISSUANCE	CONSTRUCTION & MONITORING
FHWA	Ensure all comments are addressed and adequacy of pre-final EIS.	Approve FEIS Circulate and receive comments on FEIS. Public Notice	Receive notice that 404 permit issued. Review comments to FEIS. Issue ROD	Ensure compliance with mitigation and permit conditions. Participate in pre-construction and monitoring meetings and field reviews.
ADOT/PF	In Coastal Zone - Prepare & transmit CPO, all permit applications and Consistency Determination to DGC Outside Coastal Zone - submit permit applications to individual agencies Prepare pre-final EIS and circulate to signatory agencies. Submit final 404 permit application Review comments, complete FEIS and submit for approval.	Complete and submit FEIS for approval.		Arrange for pre-construction and monitoring meetings. Construct project incorporating all mitigation measures agreed to. Monitor and maintain mitigation measures as required.
COE	Review and comment on pre-final EIS. Review final 404 permit application	Review FEIS verify that concerns were addressed. Publish 404 Public Notice	Receive 401 Certification. Receive Coastal Zone Consistency determination. Complete 404(b)(1) determination Final 404 Permit Decision Announce Decision	Participate in pre-construction and monitoring meetings and field reviews.
FWS NMFS EPA	Review and comment on pre-final EIS.	Review FEIS verify that concerns were addressed. Complete 404 review.		Participate in pre-construction and monitoring meetings and field reviews.
DEC DGC DF&G DNR	Review and comment on pre-final EIS. DGC - upon receipt of complete application packet, commence coastal zone consistency review	Review FEIS verify that concerns were addressed. Complete 404 review DEC- 401 Certification FSG - Fish Habitat or Special Area Permit DGC- Complete coastal zone consistency review. Other required state permits		Participate in pre-construction and monitoring meetings and field reviews.

Indicates concurrence point - no further activities until concurrence received from all agencies (concurrence is defined in section VIII of the Agreement)

* Affected coastal district will participate under authority provided by DGC signature

APPENDIX C EXPLANATION OF APPENDIX B PROCESSES

Program Development

Program Development is an ongoing process for both long-term and short-term transportation planning. ADOT&PF develops a multi-year State Transportation Improvement Program (STIP). All Federal-aid highway projects must come from an approved STIP. The STIP must be updated every 2 years. This document will be used to provide program information at the annual statewide meeting referred to in the Agreement.

Project Definition

During project definition, ADOT&PF expands and refines the definition of a project beyond that identified in the STIP. The need for and purpose of the project are more specifically addressed based on additional studies and projections. Possible alternatives are also investigated and analyzed for feasibility and reasonableness. The proposed type of NEPA document will be identified at this phase. Information from this phase could be available and provided at the annual meeting, and will be made available at the Regional meeting, to the extent practicable. Agencies should have sufficient information during project definition to determine the need for their involvement. As project purpose and need are finalized, Agency comment will be requested. The time frame for this activity varies depending on the scope and complexity of the project.

Scoping

Project scoping involves public and agency review, and comments on the proposed project including comments on scope and range of alternatives. Potential problem areas can also be identified at this time. The time frame is approximately one month. By the end of this phase, agencies will provide concurrence comments on purpose and need.

Alternatives Development

Based on comments obtained from the scoping process and with the involvement of the Agencies, alternatives developed by the ADOT&PF will be refined, and alternatives identified during the scoping process will be analyzed and developed as appropriate. From the full range of alternatives, ADOT&PF will select those alternatives which are considered to be reasonable that it proposes to carry forward for consideration in the NEPA document. Agencies will be asked to concur in the Department's selection of alternatives. These alternatives should be reviewed in light of the 404(b)(1) guidelines. The time frame for this activity is expected to range from 1 to 2 months or longer, depending on the

complexity of the project or need for additional field studies.

When an Environmental Assessment is proposed for a project where impacts are not known for certain, but are not expected to be significant, a preferred alternative will likely be identified. The preferred alternative will be the only build alternative fully analyzed in the NEPA document. In these instances, a concurrence decision on the preferred alternative will be requested from the Agencies.

Prepare Draft EIS

ADOT&PF will develop the draft EIS. All necessary studies, surveys etc., will be developed and analyzed. Agency participation in these studies may be requested. Possible mitigation measures and preliminary mitigation plans will be developed and presented. Agency involvement in this effort may also be requested. All Agencies will be given the opportunity to review and comment on a preliminary draft document before a final draft is submitted for approval and formal circulation. All agency comments on the pre-draft will be addressed in the final DEIS. A draft Section 404 permit application will be made after the pre-draft review but prior to approval of the DEIS. Preparation of a DEIS is expected to take from 9 months to 1 year.

Approved Draft EIS

The approved DEIS is circulated for public and official agency comment. This official review is not within the scope of the Agreement. However, it is expected that Agency review and comment done within the context of the Agreement would be recognized and taken into account in the review and formal comments. During this period a public hearing will be held. The COE may request that this be a joint public hearing. Comments on the DEIS and public hearing comments will be reviewed and addressed. A preferred alternative will be selected by ADOT&PF. ADOT&PF will submit the preferred alternative to the Agencies for their concurrence decision. The time frame for this phase is between 3 and 6 months.

Prepare Final EIS

The FEIS is prepared during this phase. Final mitigation plans are developed and incorporated. Agency involvement in final plan development may be requested. All signatories will be given an opportunity to review and comment on a pre-final EIS before it is submitted for approval. As soon as possible, but before the document is submitted for approval, the final 404 application will be submitted to COE. State coordinated review for Coastal Zone Consistency, Section 401 Certification, etc. will be initiated at this time.

Approved FEIS

The approved FEIS will be published and circulated for formal review and comment. This activity is outside the scope of the Agreement. During this period the Agencies will complete their 404 and related reviews such as the 401 Certification or the Coastal Zone Consistency Finding. The COE will complete its 404(b)(1) determination. Time for this activity is approximately 2 months.

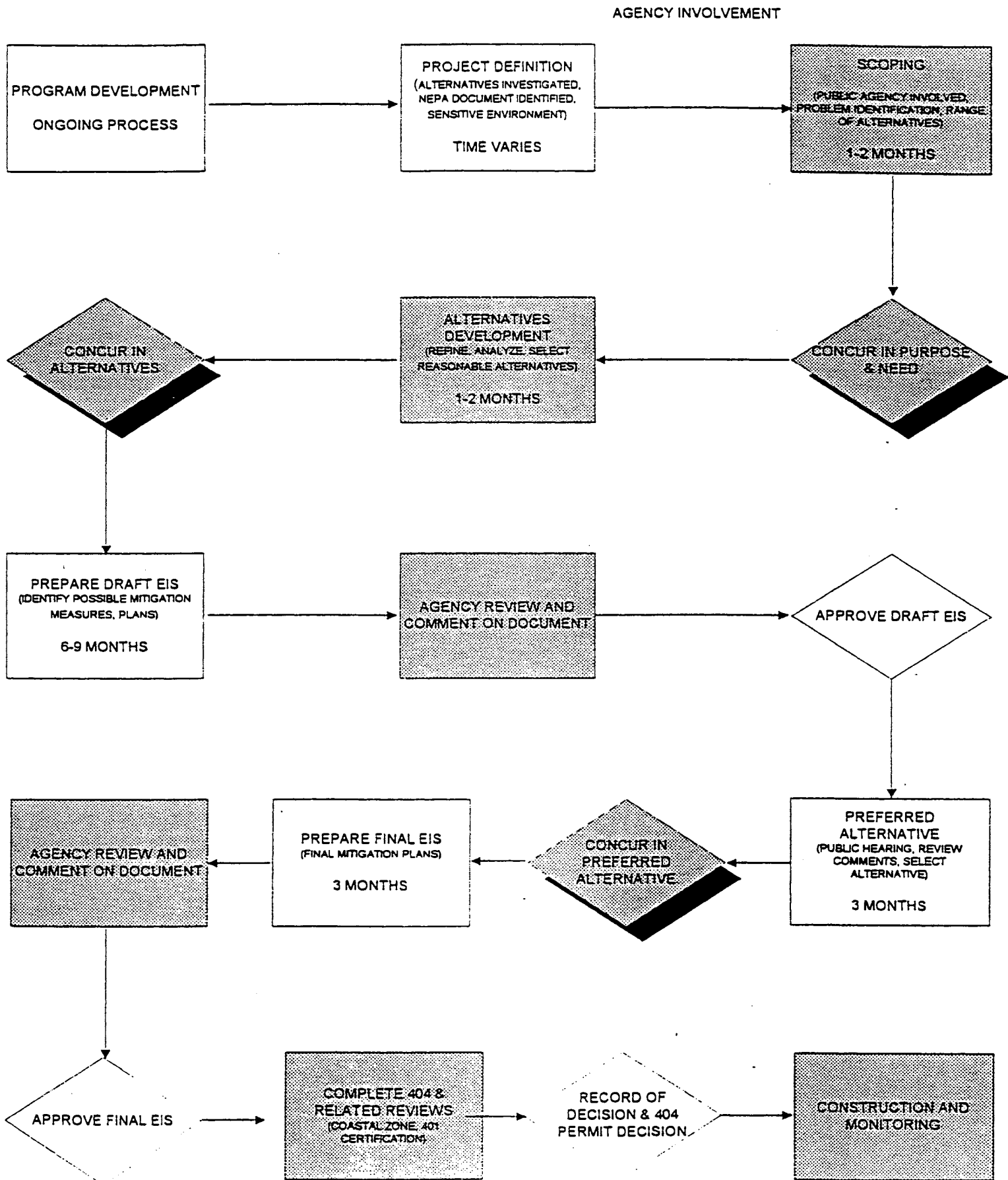
ROD & Permit Decision

These two items are events rather than activities. At the end of the review period and after all comments on the FEIS are addressed the FHWA will issue a Record of Decision. At about the same time, after receipt of all necessary documents, the COE will make the 404 permit decision and announce the decision in its ROD.

Construction and Monitoring

During this phase, the Agencies will be included in reviewing construction plans and actual construction activities to ensure that agreed to mitigation measures and permit conditions are implemented. ADOT&PF could request agency participation in the actual monitoring of construction activities, or agency participation in monitoring could be mandated as a permit condition.

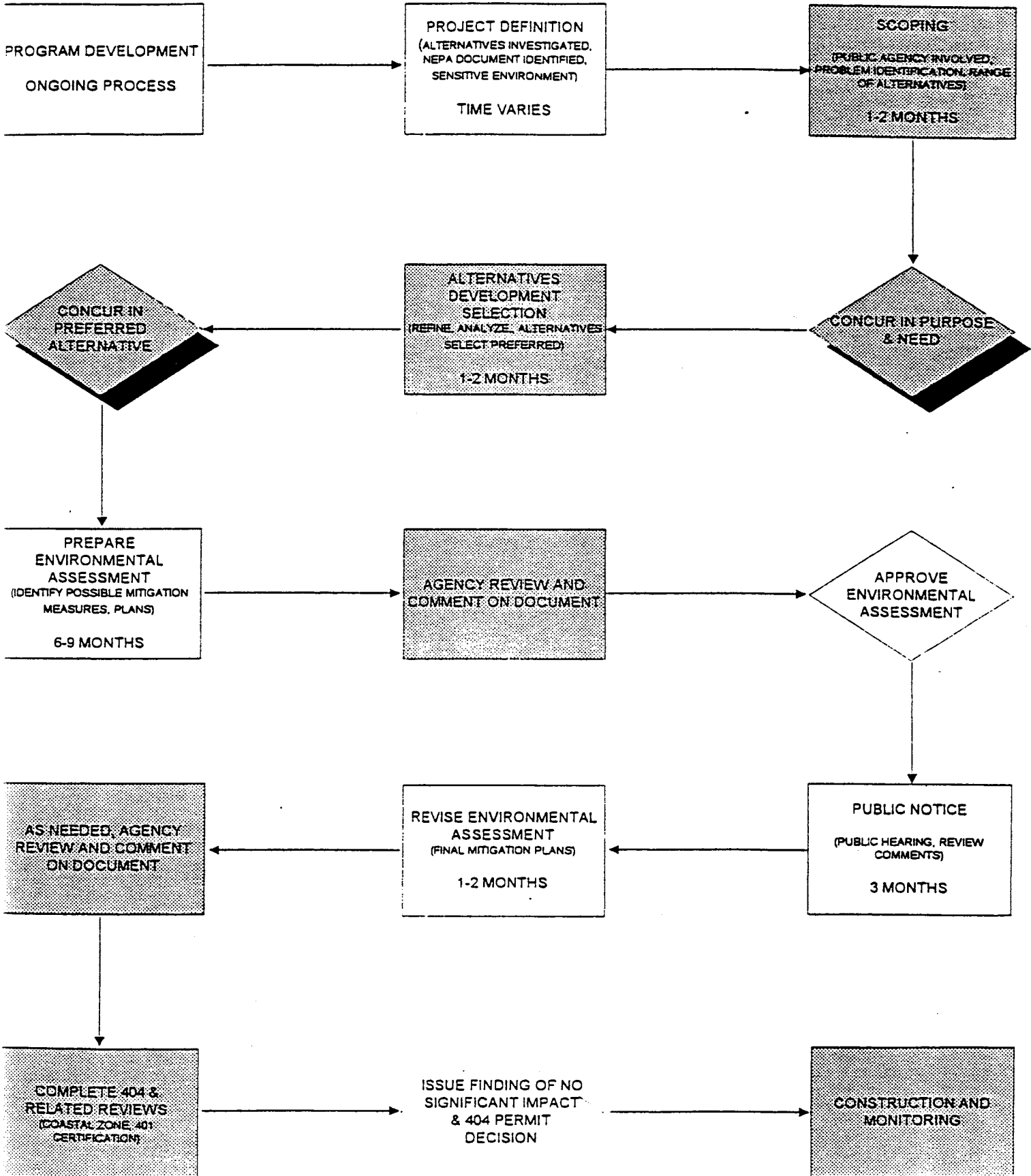
INTEGRATED EIS PROCESS DEFINED



shaded areas indicate resource agency involvement, shadowed decision boxes indicate agency concurrence points

INTEGRATED EA PROCESS DEFINED

AGENCY INVOLVEMENT



SHADED AREAS INDICATE RESOURCE AGENCY INVOLVEMENT, SHADOWED DECISION BOXES INDICATE AGENCY CONCURRENCE POINTS

