



**Cama'i Gravel Pad,
Previously Authorized by POA-
2018-00302**

Section 404 Clean Water Act Permit
Application

Supplemental Information
May 5, 2025

Prepared for:

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Table of Contents

ACRONYMS	II
INTRODUCTION	1
APPLICATION BLOCK 18: NATURE OF ACTIVITY	1
18.1 Background Information	1
18.2 Project Overview	2
APPLICATION BLOCK 23: DESCRIPTION OF AVOIDANCE, MINIMIZATION, AND COMPENSATION ACTIVITIES BOTH UNDERTAKEN AND PROPOSED.....	2
23.1 Avoidance and Minimization by Planning and Design	2
23.2 Minimization Activities Proposed during Construction	3
23.3 Compensatory Mitigation.....	5
REFERENCES	6

LIST OF ATTACHMENTS

Attachment 1: Figures

Acronyms

Afognak	Afognak Leasing, LLC
BMP	Best Management Practice
CMP	Corrugated Metal Pipe
NSB	North Slope Borough
NWI	National Wetland Inventory
USFWS	U.S. Fish and Wildlife Service

INTRODUCTION

This document supplements the information in the attached Engineering Form 4345, a permit application for the proposed expansion of the Cama'i gravel pad, previously authorized by POA-2018-00302. The National Wetland Inventory (NWI) has mapped the entire parcel as wetlands, which was used to authorize the original permit. We concur with the NWI wetland mapping; satellite imagery also confirms this. An Approved Jurisdictional Determination is not requested for this permit application.

APPLICATION BLOCK 18: NATURE OF ACTIVITY

18.1 Background Information

Afognak Leasing, LLC (Afognak) was issued a USACE 404 permit, POA-2018-00302, on May 15, 2019, for fill placement (182,000 cy) into 21.88 acres of palustrine wetlands to construct the Cama'i gravel pad. A portion of the authorized fill has not been completed due in part to the COVID pandemic, requiring a new permit application to be submitted as the authorized permit expired April 30, 2024. The original project intent was to construct the pad in three phases as described below. Because the original phasing timeline has passed, the project will be fully constructed after permit issuance. The location of the pad will minimize the distance companies in the area must travel for access to staged materials and equipment.

Permitted Project:

The originally permitted action included three phases of construction, with a tentative schedule as follows:

- Phase 1 included fill placement to 11.2 wetland acres to be completed in the summer of 2019.
 - Fill placement to total 92,500 cy.
 - Pad dimensions to be 972' x 490' x 972' x 495' with two 65' x 30' driveways. The pad to be offset 30' from the Spine Road.
- Phase 2 included fill placement to 5.42 wetland acres to be completed in the summer of 2021.
 - Fill placement to total 45,600 cy.
 - Pad dimensions to be 495' x 492' x 490' x 467' with one 65' x 30' driveway. The pad to be constructed contiguous to the southern end of Phase 1, with the 30' offset from Spine Road maintained.
- Phase 3 included fill placement to 5.26 wetland acres to be completed in the summer of 2023.
 - Fill placement to total 43,900 cy.
 - Pad dimensions to be 494' x 463' x 497' x 463'. The pad to be constructed immediately northwest of the Phase 2 pad.

The currently filled/constructed area includes a gravel pad with two 40' wide access driveways providing connection to Spine Road. The total footprint is 5.63 acres, and the dimensions are 490' x 490'. The constructed pad is offset from Spine Road. The figures in attachment 1 shows the proposed and built pads, depicting dimensions, latitude and longitude of the pads four corners, as well as driveway locations.

Culverts under each driveway are corrugated metal pipe (CMP), maintaining hydrologic flow of the surrounding wetlands and providing water management along the ditch parallel to Spine Road.

18.2 Project Overview

Afognak proposes to construct the remaining 16.24 acres of the Cama'i Pad previously authorized for construction by POA-2018-00302. Fill material will be clean, contractor furnished fill from commercial sources. Fill calculations in cubic yards have a 10% buffer. See Attachment 1 for figures and cross-sectional drawings of the proposed project.

The proposed pad would have two additional driveways providing access to Spine Road, each of which would be 65 feet wide with a CMP culvert to maintain hydrologic flow. The pad would be used to support North Slope Oil & Gas development projects (described in Block 19).

On May 23, 2024, the Alaska Department of Natural Resources authorized an entry authorization extension to Afognak for an additional 5 years; the extension is set to expire on September 18, 2029. The proposed project aligns with the goals and objectives of the North Slope Borough (NSB) Comprehensive Plan as the site is zoned for industrial development.

APPLICATION BLOCK 23: DESCRIPTION OF AVOIDANCE, MINIMIZATION, AND COMPENSATION ACTIVITIES BOTH UNDERTAKEN AND PROPOSED

23.1 Avoidance and Minimization by Planning and Design

The proposed project location is directly accessible from the existing Spine Road, avoiding long driveways and off-road travel over wetland tundra. Construction will begin immediately adjacent to Spine Road, progressing outward, thereby minimizing disturbance to wetland tundra outside of the project footprint. During construction, equipment will be mobilized from Deadhorse, stored at existing facilities in uplands and at the project site throughout construction, and then demobilized back to Deadhorse after construction.

Additionally, the proposed project is sited to avoid disturbance to lakes, ponds, streams, and rivers. The proposed project will not have impacts below the ordinary high-water mark of any waters or below the high tide line of any tidal waters, as the project footprint is not located near any of these. No additional stream or river crossings will be necessary for the proposed project. No ice roads or pads will be constructed or used for project construction.

A power source will not be required during construction. The pad is designed with capacity for snow storage following construction and no snow will be plowed into the neighboring wetlands during or following construction.

23.2 Minimization Activities Proposed during Construction

The project evaluated a suite of Best Management Practices (BMPs) to further minimize anticipated impacts from the proposed project.

Construction Methods

Staging and flagging will occur along the project boundary prior to the commencement of construction. Throughout construction, vehicles will be operated in a manner to avoid disturbing, blading, or removal of tundra or vegetative cover. No off-road (tundra) travel would take place related to construction of the proposed project as existing roads and pads provide direct site access. A layer of fill material at least four feet thick would be placed to maintain the integrity of permafrost, where present. Appropriately sized culverts will be placed at the driveways to maintain hydrologic connectivity of drainage patterns. Fill material would not be discharged within 100-feet of the high-tide line of any tidal water or the ordinary high-water mark of any lake, stream, river, pond, slough, or other non-tidal water. Gravel fill would be manually compacted to expedite the settling process.

Best Management Practices

Erosion Control Measures

The project will comply with the State's Water Quality Standards. Erosion control and construction methods will be described in the Stormwater Pollution Prevention Plan required by the State of Alaska. BMPs for road grading will be employed including proper ditch contouring and sizing; side slopes of all fills would not exceed 3:1. BMPs for embankment stabilization will be employed, including contouring and seeding. Sediment will be managed by using filter materials such as silt fence, straw wattles, and filter fabric or through settlement in ponds or weir systems constructed in ditches. The existing Spine Road will be reinforced and repaired as required. Disturbed vegetated areas will be stabilized with hydro-mulch and an approved seed mix if required.

Water needs for construction purposes will be withdrawn from Lake K214, as aligned with a sharing agreement between Afognak and all other users of K214.

Surface drainage will be culverted to ensure hydrologic connectivity. Existing surface drainage will not be adversely impeded. Existing surface and sediment controls will be maintained.

Spill Control Measures

A fueling plan and Spill Prevention, Control & Countermeasures Plan will be developed and implemented that will minimize the potential for fuel spills and mitigate the impact if a spill does occur. A minimal amount of fuel, engine oil, hydraulic fluid, antifreeze, and wastewater from construction will be located on site, associated only with regular equipment maintenance. Long-term storage of hazardous substances is not anticipated at the Cama'i Pad. BMPs to avoid and minimize spills would include:

- Properly and clearly labeling hazardous material containers;
- Secondary containment around any fueling station would be used in the form of containment berms;

- Though not expected to be present during construction, an impermeable lining and diking would be implemented for fuel storage facilities with a capacity greater than 660 gallons;
- Spill containment and cleanup kits would be located at the work area and at any fueling station;
- Regular inspection of equipment would be conducted to ensure proper functioning. Hydraulic equipment will be inspected daily for signs of wear or other potential sources of leaks;
- Refueling will occur in Deadhorse or via a fuel truck at least 100 feet from the closest waterbody;
- Adequate liners will be used under all valves or connections to diesel fuel tanks to ensure no diesel spills onto the ground;
- Pink dye would be added to all diesel fuel prior to transporting to site to aid in spill detection;
- All spills at site would be reported to the Alaska Department of Environmental Conservation and cleaned up by Afognak;
 - Oil or hazardous material spills exceeding 55 gallons would be immediately reported to the NSB. A report of all spills would be submitted weekly to the NSB.
- Drip pans will be deployed for equipment parked in the work area for more than five minutes;
- All empty grease tubes and sorbent pads will be hauled offsite by the contractor and disposed of properly;
- Fuel storage will not be placed during 100 feet of wetlands throughout construction and fuel will not be stored on the pad following project completion.

Fish and Wildlife Avoidance

Vegetation will be cleared outside of the migratory bird timing windows to avoid nesting birds. If clearing must be completed during the windows, a qualified professional can conduct a clearing survey to ensure no impacts to nesting birds. No rivers or streams are crossed or impacted for the Project.

Endangered Species Act

The spectacled eider was listed as an endangered species on May 10, 1993; as such, the U.S. Fish and Wildlife Service (USFWS) conducted a Programmatic Biological Opinion for the project in 2018 (USFWS 2018). Spectacled eider near the project area were estimated to occur at a density of 0.008 per km² (USFWS 2015). The findings of the 2018 review state that the proposed project would result in minimal permanent habitat loss to the spectacled eider.

Afognak would comply with the U.S. Fish and Wildlife Service Conditions, dated February 1, 2019, as well as with the Federal Endangered Species Act, as follows:

- Ground disturbing activities would not occur between June 1 and July 31;

- Project components would not include overhead wires or guyed towers;
- Lighting shielding would be implemented to decrease the potential of bird strikes;
- A Spill Prevention and Response Plan would be developed, approved, and implemented;
- A wildlife interaction plan, including polar bear interaction guidelines would be developed, approved, and implemented (or Afognak would adopt the Service's *Polar Bear Interaction Guidelines* prior to conducting field activities).

A No Effect Determination is recommended for the Endangered Species Act. Consultation with the USFWS Information for Planning and Consultation determined that “the proposed action is not likely to adversely affect listed species because (1) the applicant would adhere to the Minimization Measures described above, including the timing restriction intended to minimize take of nesting eiders, and (2) effects to spectacled eiders are expected to be insignificant.”, and stated “in the unlikely and unexpected event incidental take occurs, we will consider it to have been authorized under the programmatic Biological Opinion because the project applicant has agreed to adhere to minimization measures prescribed therein.”

23.3 Compensatory Mitigation

The project has avoided and minimized impacts to wetlands and waters to the greatest extent practicable by proposing to construct a pad that maximizes utility. The project footprint, and the larger surrounding area are all mapped as wetlands or waters by the NWI.

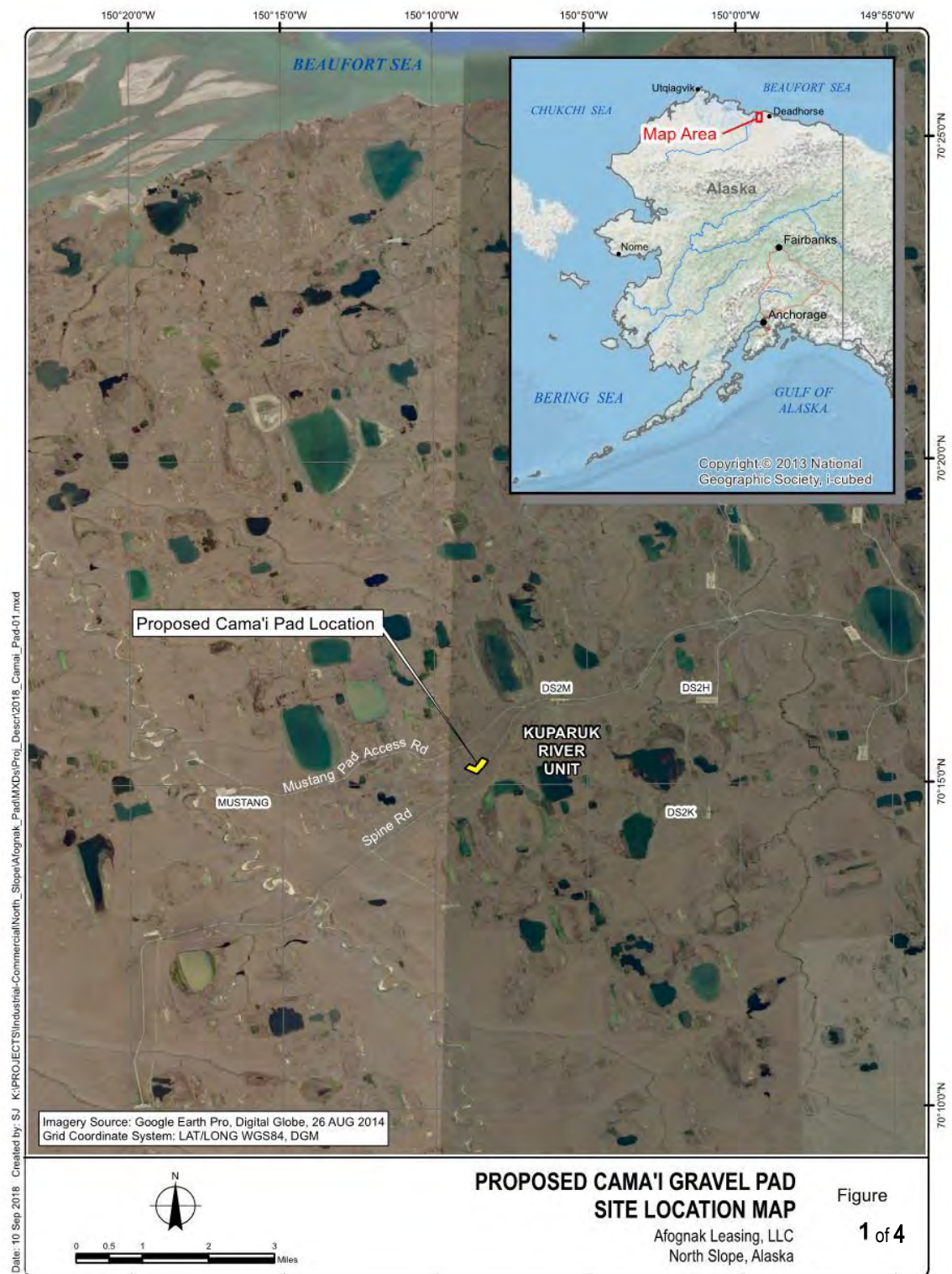
A revegetation plan will be developed in consultation with the USACE upon termination of the lease. At a minimum, the revegetation plan will address removal and treatment of the gravel, types of vegetation to be used, performance standards, and monitoring. Afognak will be liable for revegetation or reclamation efforts until all performance standards have been met.

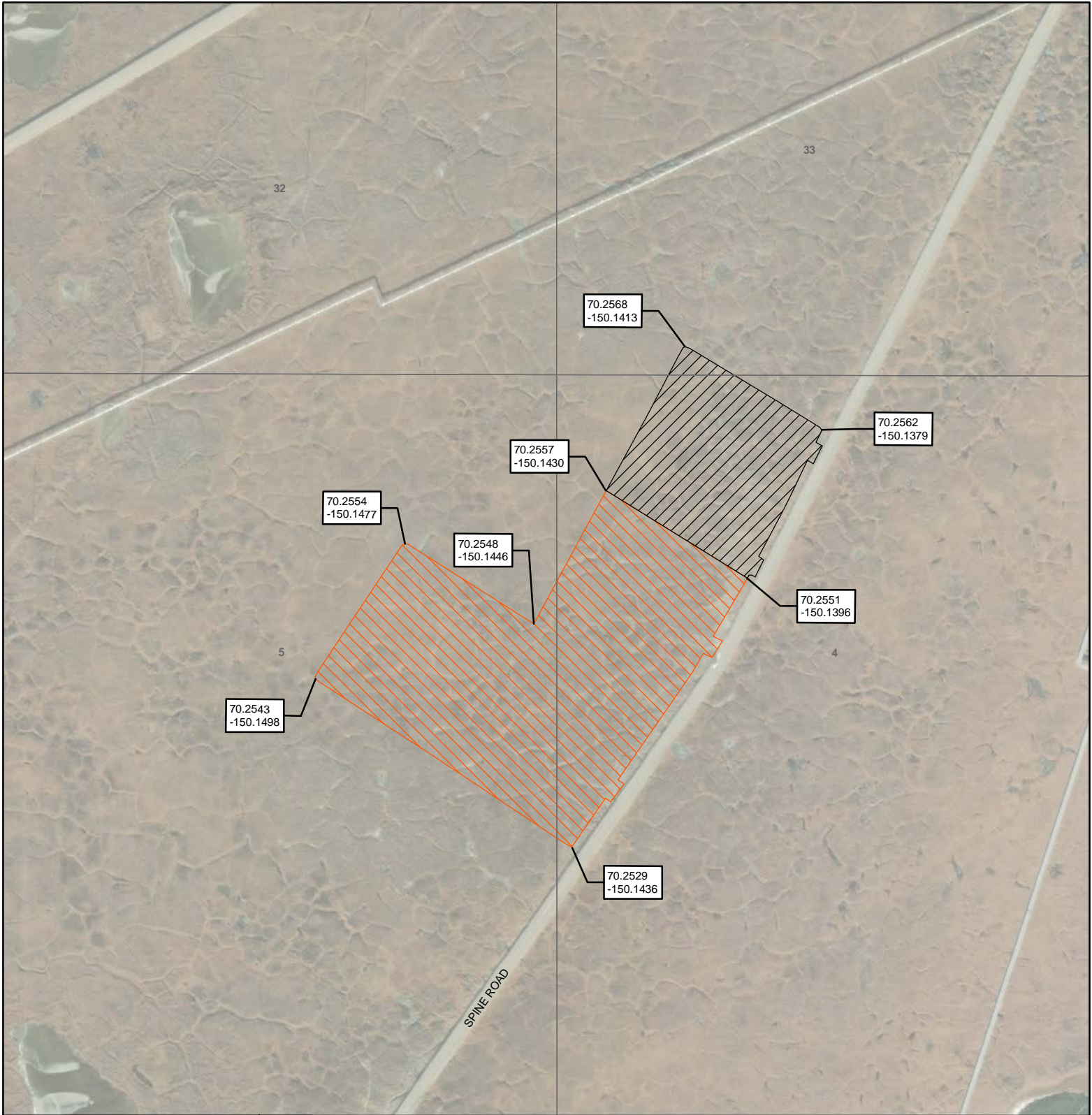
This project has already been permitted by USACE. This permit application proposes to finish the work authorized by the original permit, no new impacts are proposed. Therefore, no additional mitigation is proposed.

REFERENCES

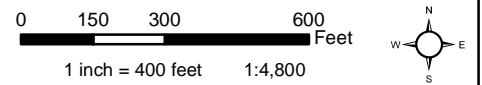
U.S. Fish and Wildlife Service (USFWS). 2015. 2012-2015 ACP Aerial Breeding Pair Waterbird Survey. Waterfowl Branch, Migratory Bird Management, USFWS, Anchorage, Alaska.

---- 2018. Wetland Impacts on the North Slope of Alaska: 2018 and 2019. Programmatic Biological Opinion. USWFS, Fairbanks, Alaska. 36 pp.



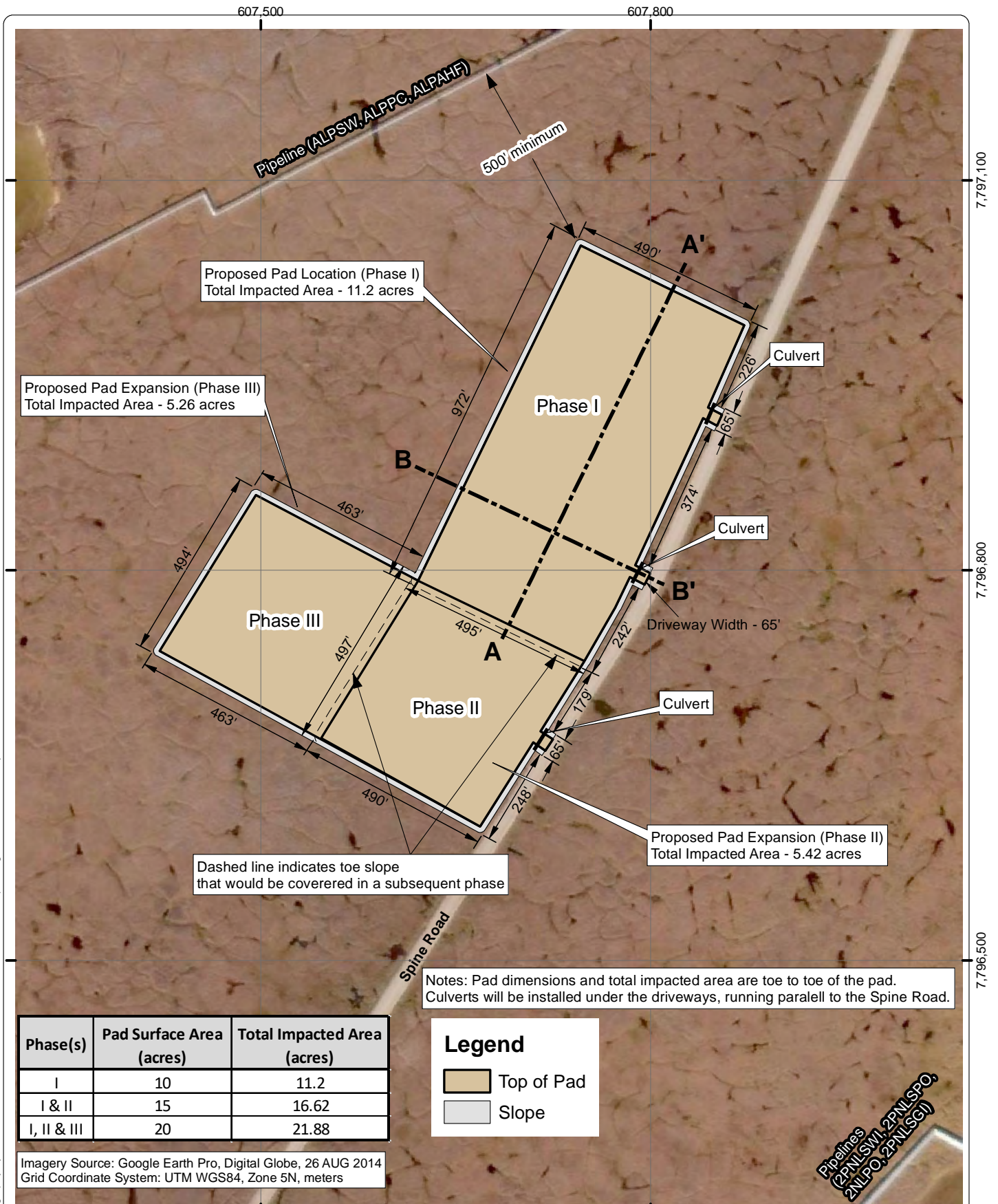


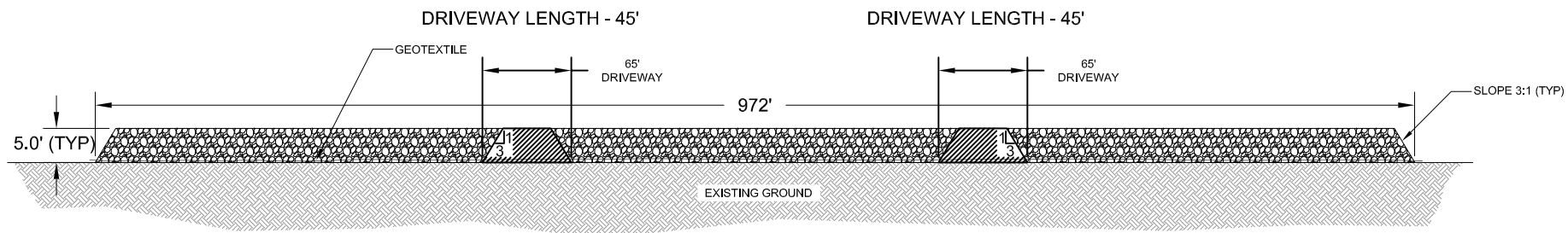
- Public Land Survey Section
- Constructed Pad (5.63 Acres in Wetlands)
- Proposed Pad (16.24 Acres in Wetlands)



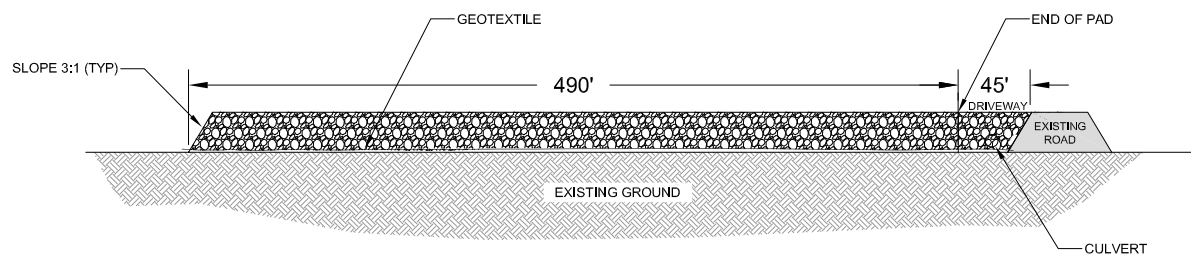
Applicant: Afognak Leasing, LLC	
File No.: POA-2018-00302	
Waterway: Miluveach River	
Proposed Activity: Cama'i Gravel Pad, Previously Authorized by POA-2018-00302	
Umiat Meridian, T10N, R8E, Sections 4, 5, 33	
Lat.: 70.2557	Long.: -150.1408
Sheet: 2 of 4	April 2025

Date: 26 Dec 2018 Cartography by: SJ K:\PROJECTS\Industrial\Commercial\North_Slope\Afofnak_Pad\MXDs\Proj_Desc\2018_Camal_Pad-04.mxd

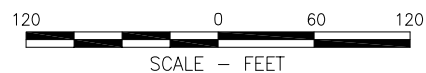




A - A'



B - B'



VERTICAL EXAGGERATION - 5x

DATE: 16 JUL 2018

PREPARED BY: S. Johnson

REVIEWED BY: M. Larson

PROJECT No:



AFOGNAK PAD CROSS-SECTIONS

POA-2018-00302, Miluveach River
Afognak Leasing, LLC.
Drawings dated December 27, 2018
Sheet 4 of 4