Attachment B
Project Description

Introduction & Project Purpose

The Alaska Department of Transportation & Public Facilities (DOT&PF) Southcoast Region – in coordination with the City of King Cove, King Cove Corporation (KCC), and the Aleutians East Borough – is seeking to construct a road within connecting the community of King Cove to the Cold Bay Airport through construction of a new, single-lane, unpaved road connecting King Cove Road, north of King Cove, with Blinn Lake Loop just north of Cold Bay. This road will be constructed on lands owned by the KCC.

While the project has been designed to avoid impacts to jurisdictional wetlands and other waters of the United States (WOTUS), it will result in unavoidable impacts to such areas. Project components that involve the discharge of fill material into WOTUS will be subject to Section 404 of the Clean Water Act. The DOT&PF is seeking authorization from the United States Army Corps of Engineers (USACE) to conduct this work under an individual permit. This document also identifies other environmental permits and authorizations that may be required prior to construction.

The Section 404 Permit and all responsibilities under that permit will be accepted by the State of Alaska to be implemented by DOT&PF. The constructed road will be a public road operated and maintained by the Aleutians East Borough, a political subdivision of the State of Alaska, and the public road will provide access to the inholding of the community of King Cove for the benefit of the residents of the City of King Cove, also a political subdivision of the State of Alaska.

Project Overview

The King Cove Road project will construct approximately 19 miles of road between the communities of King Cove and Cold Bay. One bridge with a span of approximately 150 feet will be constructed over an unnamed creek at the approximate milepoint 2.6. The road will be a 13-foot wide, single-lane road with intervisible turnouts. Project features are outlined in Table 1.

Table 1. Project Features

Project Features	Quantities
Roads (miles)	19
Number of stream crossings	64
• Culverts/Pipe arches installed for stream crossings	63
• Bridges installed for stream crossings	1
Material Sites	2

The project will discharge approximately 60,000 cubic yards of fill material for the roadway embankment and stream crossings, impacting approximately 8.9 acres of wetlands and other WOTUS. Discharges in wetlands and waters of the U.S. are described in more detail below.

The project is planned for a three-year construction period.

Summary of Discharges into Wetlands and Waters of the U.S.

Wetland Identification

In August 2025, the DOT&PF contracted with DOWL Inc. to conduct a field wetland delineation of the proposed project area, including the land identified to satisfy compensatory mitigations requirements. Wetlands were identified in accordance with *Part IV of the Corps of Engineers Wetlands Delineation Manual* and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Alaska Region Version 2.* Wetlands were classified and grouped according to guidelines outlined in the *Classification of Wetlands and Deepwater Habitats of the United States.*

Data was collected at sampling locations in distinct habitat types to verify the results of preliminary wetland mapping based on review of existing data (Section 2.1). Sampling point locations typically included excavation to a depth of 24 inches, or to a restrictive digging layer (e.g., regolith, bedrock). Observations were recorded at each sampling point using the combined three-parameter approach: site-specific indicators of hydrophytic vegetation; presence of hydric soils; and wetland hydrology.

This field effort found that within the 1,402-acre road study area, 169.3 acres (12.1% of the study area) of wetlands were present. Surveyors noted that this was due to the topography of the area – which includes primarily low rolling hills – and well-draining soils.

Construction associated with the 19-mile road, including one new material site and the expansion of an existing material site, would impact approximately 181 acres of land. Wetlands would be directly affected as a result of road construction. Impacts to wetlands and other WOTUS from the proposed project are presented in the table below:

Table 2. Wetland and Waters Impact Types

Cowardin Class	Acres Impacted by Road Construction
L1UBH	0.12
PEM1B	0.19
PEM1C	3.72
PEM1F	1.56
PEM2A	0.15
PSS1B	2.50
PSS4/EM1B	0.14
PUBH	0.23
R2UBH	0.29
Grand Total	**8.90**

Road Construction

The proposed project will construct approximately 19 miles of roadway. Construction of the roadway will require the permanent discharge of approximately 60,000 cubic yards of fill material over 8.9 acres of wetlands and other WOTUS (Table 3). The discharge of fill material in

these areas is not proposed.

Material Sites

In order to access competent material and avoid impacts from dedicated material sites, cut slopes were expanded in areas where competent material is expected to be encountered. Due to the presence of bedrock and the nature of topography at these locations, the presence of wetlands was found to be minimal. These sites were further limited to eliminate material harvesting within wetlands, where present.

Two dedicated material sites will be developed within the project area. The first is an existing site adjacent to the historic hovercraft landing at the end of King Cove Road. The second is located at the approximate milepoint 5 of the proposed road. Neither of the proposed material sites are located within wetlands.

Stream Crossings

The proposed road construction will install 64 culverts for stream crossings along the alignment. One bridge will be constructed to cross an unnamed creek at the approximate milepoint 2.6. The DOT&PF contracted a fish habitat survey along the proposed alignment, which is included as Attachment E. This survey found that ten of the proposed stream crossings contain fish. Structures conveying these waterways will be designed to meet aquatic organism passage criteria, as required by Title 16 of Alaska Statute.

Permits & Approvals

Table 6 provides applicable permits and authorizations that may be required for the proposed project, the regulatory agency responsible for issuing permit approvals, and the pertinent regulatory authority of the agency.

Table 3. Summary of Permits and Authorizations

Permit / Authorization	Agency	Description
Individual Permit Clean Water Act, Section 404 and Rivers and Harbors Act of 1899, Section 10.	USACE	Section 404 requires approval prior to discharging dredged or fill material into the waters of the United States (U.S). Section 10 requires approval prior to conducting activities such as dredging, filling, or building structures in, over, or under navigable waters of the U.S.
Clean Water Act Section 401 Certification	ADEC	A state-issued Section 401 Certificate of Reasonable Assurance must accompany a Section 404 permit.
APDES Construction General Permit	ADEC	This regulation designates a threat to water quality for projects with activity 200 ft. from a wetland or water body and/or has a disturbance of greater than or equal to 5 acres. It addresses operational practices and monitoring during and after the project construction.
Alaska Title 16 Fish Habitat Permit	ADF&G	The Fishway Act (Alaska Statute (AS) 16.05.841) requires that an individual or government agency notify and obtain authorization from the ADF&G Division of Habitat for activities within or across a stream used by fish, if the ADF&G determines that such uses or activities could represent an impediment to the efficient passage of (anadromous and/or resident) fish. The Anadromous Fish Act (AS 16.05.871) requires that an individual or government agency provide notification and provide approval from the ADF&G "to construct a hydraulic project or use, divert, obstruct, pollute, or change the natural flow or bed" of a specified waterway.

Note: This table does not include an exhaustive list of all construction-specific permitting requirements (e.g., temporary water use permits, air permits). Additional construction permits would be the responsibility of the contractors selected by DOT&PF to complete the final design and to construct the project.

Attachment C
Description of Avoidance, Minimization, and Compensation

Introduction

This Mitigation Statement was prepared as an attachment to the Section 404 Individual Permit application for the King Cove Road project proposed by the Alaska Department of Transportation and Public Facilities (DOT&PF). The purpose of the Mitigation Statement is to (1) describe the proposed avoidance and minimization of impacts to jurisdictional wetlands and other resources in the project area, and (2) identify the proposed compensatory mitigation for unavoidable impacts to wetlands and other waters of the United States from construction of the road. Please see the project description, included as Attachment B of the permit application package for additional project details.

The project has been developed to avoid and minimize fills in wetlands and other aquatic resources to the maximum extent practicable, as described below. Direct impacts to wetlands and waters, however, are unavoidable for most projects on the Alaska Peninsula, as wetlands and streams are abundant and widespread.

Avoidance and Minimization

The project has been designed to avoid and minimize the discharge of fill into wetlands and other waters. The following avoidance and minimization measures have been incorporated into the design and construction of the project.

Design avoidance measures:

- By incorporating existing roads into the alignment, the project has been designed to avoid discharge fill into wetlands and other aquatic resources.
- The proposed road has been located to follow upland ridges wherever possible to avoid wetlands and minimize snowdrift.
- The design incorporates 4:1 side slopes, as recommended for slope stability and traffic safety, to avoid impacts to wetlands and other waters, where practicable.

Design minimization measures:

- Existing drainage patterns will be maintained to the greatest extent practicable. Properly sized and designed culverts will be used in appropriate locations to maintain the natural flow patterns and timing of surface water inflows to adjacent wetlands and waters.
- Stream crossings are designed to be perpendicular to the axis of the channel as engineering and routing conditions allow.
- The design incorporates 4:1 side slopes, as recommended for slope stability and traffic safety, to minimize impacts to wetlands and other waters (Attachment A: Permit Figures).

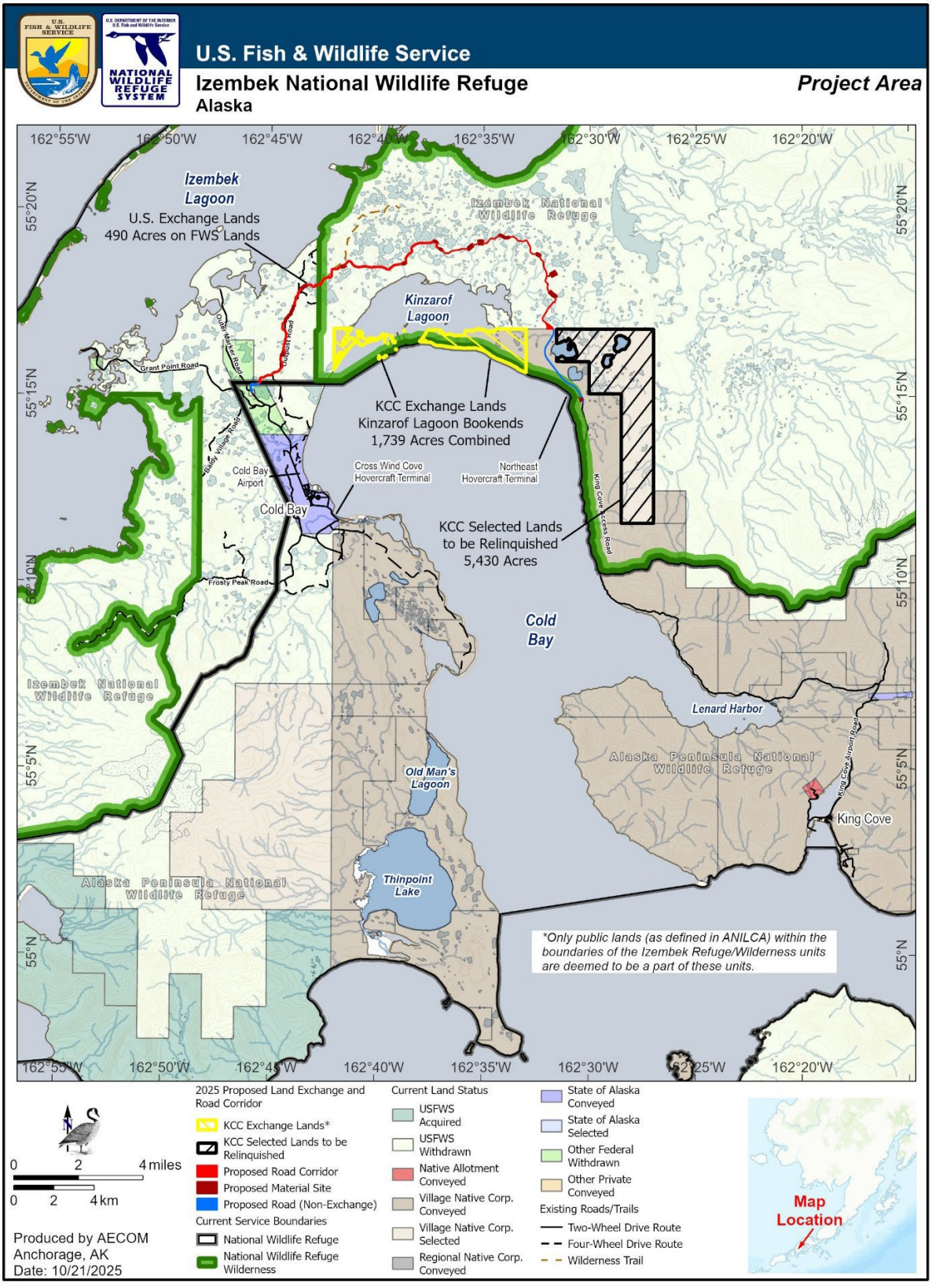
Construction avoidance and minimization measures:

- To the extent practicable, staging areas and other work areas will be located in uplands, at least 50 feet away from wetlands and/or water's edge. Previously disturbed upland areas will be used where possible.
- Contaminant-free embankment and surface materials will be used during construction to avoid introducing contaminated material to the project area.
- Project limits in waters of the U.S. will be clearly identified in the field (e.g., staking, flagging, silt fencing, existing footprint for maintenance activities, etc.) prior to clearing and construction to ensure avoidance of filling additional waters of the U.S. (including wetlands) beyond project footprints.
- Equipment will remain inside the identified project limits, and will not be stored, maintained, or repaired in waters of the U.S. Temporary stockpiles and equipment staging areas will be located in uplands or previously disturbed areas.
- A Stormwater Pollution Prevention Plan (SWPPP) will be prepared for the project. The plan will clearly describe best management practices (BMPs) required during construction to prevent erosion and runoff from entering aquatic habitats.
    - Erosion and sediment control measures (perimeter protection) such as silt fences and straw wattles will be placed around wetlands and waters within the disturbance limit (within 15 ft).
    - Temporarily disturbed areas, including slopes, will be re-contoured to match existing contours and stabilized within seven days of the completion of construction in the area. All silt fences, curtains, and other structures will be installed properly and maintained in a functioning manner where fill material and exposed soils might cause transport of sediment or turbidity beyond the immediate construction site.
    - Standard spill-prevention measures will be implemented during construction. Spill clean-up equipment (e.g., oil-absorbent pads) will be available onsite during construction.
- Any stream bank affected by the work will be restored and stabilized. The stream bed and banks will be backfilled and restored to the pre-existing course, condition, capacity and location.

Compensatory Mitigation

The DOT&PF has developed the proposed project in coordination with state, borough and city government entities that represent the private landowners in the community of King Cove. Many of those landowners are also shareholders of the King Cove Corporation (KCC) which previously owned land in the vicinity of Kinzarof Lagoon known colloquially as the "bookends". In October 2025, the U.S. Department of Interior entered into a land exchange agreement to convey approximately 500 acres of the Izembek National Wildlife Refuge to the KCC for a single lane gravel road (the subject of this application) in exchange for approximately 1,739 acres of lands in the vicinity of Kizarof Lagoon ("the bookends"). KCC also relinquished its selection rights under the Alaska Native Claims Settlement Act to 5,430 acres of land within the Izembek Refuge. Figure 1 includes a graphic produced during the USFWS land exchange process and depicts lands subject to the land exchange.

Figure 1: USFWS Land Exchange Graphic



The DOT&PF asserts that the unequal land exchange between the King Cove Corporation and the U.S. Fish & Wildlife Service fulfills the compensatory mitigation requirements of the **404(b)(1) Guidelines** for this project because it produces a net gain in long-term ecological function and habitat preservation. The lands contributed by KCC—now incorporated into the Izembek Refuge and designated Wilderness—are conserved in perpetuity and include high-value habitat at the mouth of Kinzarof Lagoon. This area supports exceptionally productive wetlands, providing breeding, staging, and foraging habitat for shorebirds; waterfowl such as black brant and tundra swan; and a variety of terrestrial mammals. Field delineations conducted for the project confirmed that the KCC-acquired lands contain a significantly higher proportion of wetland habitat (33.1%) compared to the USFWS exchange lands (12.1%), demonstrating that the functional resource base being added to federal conservation status far exceeds the limited and localized wetland impacts associated with the road corridor.

Under **40 C.F.R. § 230.93(a)–(f)**, compensatory mitigation must replace or preserve aquatic resource functions such that unavoidable impacts are fully offset, and preservation is expressly appropriate where it protects "ecologically important" areas that would otherwise face a risk of future degradation. The Kinzarof Lagoon parcels meet this standard: their permanent withdrawal from potential corporate development and their integration into the Izembek Refuge ensure the long-term maintenance of hydrologic connectivity, wildlife movement corridors, and high-functioning wetland systems. By contrast, the road corridor impacts are linear, minimal in scale, and tightly confined. Therefore, the exchange yields a **functional surplus**, not merely an acreage substitution, and provides compensatory mitigation that is practicable, environmentally preferable, and consistent with the conservation-balance objectives of the **404(b)(1) Guidelines**.