

CWA 401 Water Quality Certification Request

version 2.17

(Submission #: HQS-3XS5-ZJ4MR, version 2)

Digitally signed by:
dec.alaska.gov
Date: 2026.10.07 14:08:16 -08:00
Reason: Submission Data
Location: State of Alaska

Details

Site: AIDEA West Susitna Access Project

Submission ID HQS-3XS5-ZJ4MR

Form Input

Form Instructions

Form Instructions

Instructions for filling out the 401 Prefiling Meeting Request Form are located on the Alaska DEC website at the link below.

[401 Prefiling Meeting Request Form Instructions](#)

Agents: For Delegation of Authority to act on behalf of the applicant in processing the application, use the following form, have signed, and upload with application.

- [Delegation of Authority - 401 Application](#)

Contact Information (1 of 3)

Required Contacts

The following **Contact Roles are REQUIRED**. Please select the appropriate role(s) for each contact and complete the contact details. Multiple role(s) may be assigned to each unique individual.

- **Applicant** (Responsible Party)
- **Billing Contact**

Contact Role(s)

Agent

Consultant

Contact

Prefix

NONE PROVIDED

First Name Last Name

Rachel McNamara

Title

NEPA Practice Manager

Organization Name

VHB

Phone Type Number Extension

Business 7572792903

Email

rmcnamara@vhb.com

Mailing Address

1001 G St., NW

Suite 1125

Washington, District of Columbia 20001

United States

Contact Information (2 of 3)

Required Contacts

The following **Contact Roles are REQUIRED**. Please select the appropriate role(s) for each contact and complete the contact details. Multiple role(s) may be assigned to each unique individual.

- **Applicant** (Responsible Party)
- **Billing Contact**

Contact Role(s)

Applicant

Contact

Prefix

NONE PROVIDED

First Name Last Name

Brandon Brefczynski

Title

Deputy Director

Organization Name

AIDEA

Phone Type Number Extension

Business 907-347-4569

Email

bbref@aidea.org

Mailing Address

813 West Northern Lights Blvd.

Anchorage, AK 99503

United States

Contact Information (3 of 3)

Required Contacts

The following **Contact Roles are REQUIRED**. Please select the appropriate role(s) for each contact and complete the contact details. Multiple role(s) may be assigned to each unique individual.

- **Applicant** (Responsible Party)
- **Billing Contact**

Contact Role(s)

Billing Contact

Contact

Prefix

NONE PROVIDED

First Name

Taryn

Last Name

Perez

Title

Special Project Manager

Organization Name

AIDEA

Phone Type

Business

Number

9077713013

Extension

Email

ap@aidea.org

Mailing Address

813 West Northern Lights Blvd.

Anchorage, AK 99503

United States

Project / Facility Site Info

Identify the applicable federal license or permit

A copy of the federal permit or license application is required to be submitted with the request for the water quality certification. (18 AAC 15.130, 18 AAC 15.180)

Federal Agency

Army Corps of Engineers (USACE)

Permit License Number (ex. USACE: POA-XXXX-XXXX; FERC: FERC-xxxx-xxxx; EPA: AK#####)

POA-2022-00165

Project Name or Title

AIDEA West Susitna Access Project

Primary Receiving Waterbody Name

Skwentna River

Estimated Project Dates (+/- 30 days)

Project Estimated Start Date	Project Estimated End/Completion Date
01/01/2028	01/01/2032

Approximate date(s) when any Discharge(s) may commence (+/- 30 days)

Description	Discharge Estimated Start Date	Discharge Estimated End Date
NONE PROVIDED	NONE PROVIDED	NONE PROVIDED

Project Description (Nature of Activity, include all features)

The approximately 78.5-mile proposed road would begin approximately 1.4 miles west of Alexander Creek (the western terminus of DOT&PF's proposed West Susitna Access project), or Milepost (MP) 0. From there, the proposed road would continue along the northeastern toe of slope of Mount Susitna and Beluga Mountain. The proposed road would continue westward into the Skwentna River valley, ending at the Whiskey Bravo airstrip and mineral exploration camp.

In addition to the two-lane access road, the Project would include construction of culverts and bridges at river/stream crossing locations as well as a maintenance station, airstrip, material source areas, and water extraction site access roads. Table 1 (see attached) presents a summary of the major components to be included in construction of the proposed road. Approximately 56 miles of the proposed route between Beluga Mountain and Happy River roughly parallels the proposed natural gas pipeline corridor for the proposed Donlin Gold Project (POA-1995-120). Temporary construction components for the Project would include winter access routes, temporary river/stream crossings, temporary stream diversions, and cofferdams for bridge construction.

The Project would be constructed entirely on State-owned land. The Project would not directly impact or encroach on any private property. A total of 951 existing private parcels are located within 5 miles of the road centerline. Property owners within 5 miles of the proposed Project are identified in Appendix D Land Ownership Table and Map Set (see attachment). The Project would include a proposed 300-foot-wide right-of-way which would be available for routing of future utilities.

The proposed Project is being designed to meet basic access road needs for public users. The roadway is designed for highway-legal vehicles, but the design would not preclude the occasional oversize or overweight vehicle with proper traffic control and other considerations.

Two-Lane Road: The proposed action would involve constructing a gravel-surface, 24-foot-wide, two-lane road designed to meet American Association of State Highway and Transportation Officials (AASHTO) standards for a Rural Recreational and Scenic Road (AASHTO 2001). The Project is currently designed to the geometric criteria below. The application of specific criteria is subject to the final design details.

- ◆ Design speed of 30 to 45 miles per hour (mph) depending on terrain and other factors
- ◆ Maximum running grade of 6 percent
- ◆ Localized maximum grade of 8 percent for short distances
- ◆ Minimum grade of 0.5 percent for drainage
- ◆ Cross slope of 3 percent for drainage
- ◆ Maximum super elevation rate of 4 percent
- ◆ Minimum horizontal curve radius: 645 feet (45 mph), 230 feet (30 mph)
- ◆ Minimum K-Value for vertical curves: sag 79 and crest 42 (45 mph), sag 37 and crest 13 (30 mph)
- ◆ Minimum stopping sight distance: 300 feet (45 mph), 165 feet (30 mph)

Stream Crossings: The proposed route crosses numerous creeks, streams, and rivers, collectively referred to as ◆stream(s)◆ in this document. Crossings would be accomplished with culverts or bridges, depending upon the ordinary high water (OHW) stream widths, stream characteristics, and various topographic considerations. In some cases, the decision on stream crossing type was also based on construction cost, constructability, and long-term maintenance considerations.

Culverts: The proposed action would involve constructing culverts from 3 up to 50 feet wide at stream crossing locations along the route. Culvert design for this Project has been divided into two broad categories: drainage culverts (Categories 1, 2, 3, and 5) and fish passage culverts (Categories 4, 6, 7, and 8). Table 7 (see attached) provides details on the numbers of culverts in each category. Appendix C (see attached) lists each culvert identifier, the location of each culvert, characteristics of each stream crossing, fish presence, and the proposed culvert type. Typical culvert details are shown on Figures CX-001 through CX-009 in Appendix A Figures.

Bridges: Table 8 (see attached) describes the stream crossings that would be constructed as bridges. Waterways that are determined to be navigable require a Rivers and Harbors Act Section 9 permit from the U.S. Coast Guard (USCG; USCG 2012). None of the waterways crossed are currently listed as navigable by the USCG (2012) or USACE (2025a). No streams within the Project area are subject to the ebb and flow of the tide. Bridges would have a useable roadway width of 28 feet plus 1.5 feet on each side to allow for railings, for an overall width of 31 feet. Bridge spans up to approximately 150 feet would be subject to site specific designs that may include modular-type pre-engineered bridges (e.g. Acrow Bridge, Bailey Bridge, etc.) or DOT&PF-standard precast deck bulb-tee girders. Similarly, bridge spans over 150 feet would be subject to site specific designs that may include modular pre-engineered bridge or steel plate girder bridges with cast-in-place concrete deck.

Bridge lengths were approximated by examining aerial photography and topography to identify approximate bankfull width of waterways. A minimum 25-foot setback from the bankfull edge of the waterway or adjacent wetland boundary was maintained to the toe of end slopes. For single span routine bridges, a 10-foot setback was used if the channel was well defined and appeared stable over historic aerial photographs. End slopes are proposed to be 2 Horizontal (H):1 Vertical (V) for intermediate and complex bridges. Vertical abutments are proposed for routine single span bridges. During final design, bridge lengths will be refined with more detailed topographic survey, hydraulic analysis, regulatory agency consultation, and structural/geometric optimization. The Figure Index in Appendix A (Figures) shows the location of each bridge crossing, and Figures BX-001 through BX-010 show the plan and profile of each bridge crossing.

Trail Crossings: The current Iditarod trail, historical routes, and prescriptive routes for the Iditarod National Historic Trail (INHT) are located in close proximity to the proposed Project. The proposed route crosses documented INHT alignments at multiple locations. The route also crosses Revised Statute 2477 (RS2477) trails, motorized winter trails, and other miscellaneous recreational trails. Two types of crossing structures would be used where the proposed route intersects trails. At-grade crossings with broad approach slopes would be used for the majority of smaller recreational trail crossings. Bridges would be used over larger or historical trail crossings, such as the INHT. Table 9 (see attached) outlines the trail crossing locations and crossing type for the proposed Project. The Figure Index in Appendix A (Figures) shows the location of each trail crossing, and Figures TX-001 and TX-002 show the typical details of the at-grade and bridge crossing structures.

Material Sites: The proposed road would have 17 material site locations at approximately 1- to 7-mile intervals. These sites would provide the sand, gravel, and riprap needed for construction and maintenance of the road. Material sites are divided into two types: borrow sites provide gravel and sand, while quarry sites provide rock that can be processed into riprap or smaller aggregates. Materials would be transported from the material site to the Project site by truck along constructed access roads. If the material site is not located directly adjacent to the road, access roads would be constructed to the material site to transport heavy equipment to the site and transport material to the road corridor. Not all 17 material sites, nor all areas demarcated within the material site boundary, are expected to be used during construction to provide materials for the road. Additional geotechnical information will be collected during final design to determine the quantity and quality of the resources available at each material site. This information would help determine which subset of material sites would be used, and where within the material site boundary the actual borrow and quarry sites would be located. Material sites located in uplands may also be used as waste material disposal sites. Excess excavated material that is either unsuitable or not used as backfill would be disposed at these sites. Material sites that were used during construction and determined to be no longer needed for road maintenance would be closed subject to State of Alaska landowner reclamation requirements and made available for public use.

Maintenance Station: The proposed road would include the construction of one permanent maintenance station. The maintenance station would have fence line dimensions of approximately 500 by 1,000 feet and would provide equipment storage, worker housing, and materials needed to maintain the road year-round. Ground disturbance outside the fence line is estimated to be approximately 100 feet for an overall disturbance area of 700 by 1,200 feet. The maintenance station would include onsite diesel-electric generators with secondary-containment fuel storage tanks for electricity generation. The maintenance station would also have a groundwater well for potable water supply as well as a septic tank and drain field for sanitary sewage treatment and disposal. During construction, the maintenance station footprint would be used as staging and laydown areas as well as temporary construction camps. The maintenance station is generally sited near other Project components to support major construction activities. The maintenance station is located adjacent to Shell Creek airstrip to facilitate worker shift changes as well as the transport of materials and equipment.

Airstrip: One airstrip would be constructed along the proposed route to support construction through the transport of construction equipment, materials, and worker crews. After construction is complete, the airstrip would facilitate emergency transport of workers and supplies to the maintenance station in the event of a road closure. The airstrip would be closed to public use during construction but could be open to public use after construction is complete. The runway would be 200 feet wide and 5,000 feet long, have a 500-foot-wide runway safety area (RSA), and be able to accommodate a C-130 Hercules. Areas 1,000 feet from the ends of the runway would be cleared of vegetation to prevent obstructions to the airspace, improve visibility, and limit wildlife habitat. Vegetation would be removed at or above the ground surface. No grubbing or ground-disturbing activities would occur within these areas.

Water Extraction Sites: The proposed Project would have nine water extraction sites located at regular intervals along the proposed route. Water extraction sites are composed of access roads to the bank of a water source, where water trucks can pump water for use during construction and maintenance. The access roads would have a 24-foot-wide surface to accommodate water trucks and heavy machinery during construction as well as for road maintenance. The typical structural section of the access road is the same as for the primary road and is shown on Figure RX-001 in Appendix A (Figures). Water extraction sites are located adjacent to some bridges; however, within areas with few stream crossings, water extraction sites are located at nearby ponds. Water extraction methods, equipment, and timing will comply with ADF&G guidelines for avoiding fish impingement. Water extraction sites and related access roads that were used during construction and determined to be no longer needed for road maintenance would be closed subject to State of Alaska landowner reclamation requirements and made available for public use.

Winter Access Route: The Skwentna River Bridge No. 1 crossing is at a location with steep topography. For this crossing a winter access route would be used to access and transport material to the other side of the bridge crossing during construction. The access route would generally be located within 1 mile of the proposed stream crossing, within areas with gentler slopes that are more favorable for transporting equipment. The route would only be used during winter. Construction would only involve vegetation clearing. Vehicles and equipment would drive on the frozen ground and river ice surface. No fill would be placed; however, minor cuts into steep upland sections of banks may be necessary.

Construction Staging Areas and Worker Camps: Construction staging areas and worker camps would be sited within the proposed footprint of the Project. Most staging and laydown areas as well as camps would either be located within the material sites, the road footprint, or the proposed footprint of the permanent maintenance station. No additional temporary construction staging areas or worker camps would be required.

Project Purpose (Describe the reason(s) for discharge)

The purpose of the West Susitna Access Project (the Project) is to provide safe, year-round public road access to remote areas of the Matanuska-Susitna Borough (MSB). Starting from the Alaska Department of Transportation and Public Facilities (DOT&PF) planned 22-mile West Susitna Access Road, this 78-mile road will continue on to currently remote Alaska State (State) public lands, private lands within MSB, and areas planned for resource development. A year-round road would significantly improve the safety, reliability, and accessibility of the area west of Alexander Creek for public use including uses such as hunting, fishing, trapping, boating, recreation, and settlement. Collectively, this would provide a means for promoting:

- ◆ Health, security, and general welfare of all people of the State
- ◆ Job growth and increased economic development opportunities for the State and population centers in Southcentral Alaska for resource development and land use
- ◆ Long-term, sustainable, economic and public benefits derived from State and MSB revenue from increased land/property values and tax base

The 78-mile gravel access road would connect to the planned Alaska DOT&PF highway system near Alexander Creek and continue northwestward into the Skwentna River valley, ending at the existing Whiskey Bravo airstrip. This route provides an access corridor in close proximity to an already used recreational hunting and fishing area; existing platted subdivision for settlement; and large natural resource areas with marketable timber, critical and strategic minerals, agricultural lands, energy sources (e.g., oil, gas, coal, renewables) that include existing lease block areas, and a planned pipeline infrastructure project (Donlin Gold natural gas pipeline). The Western Susitna Basin contains occurrences of minerals such as antimony, copper, and gold which are minerals referenced in Executive Order 14241, Immediate Measures to Increase American Mineral Production, in Sec. 2(a) (March 20, 2025). The access road would provide surface access to these important minerals.

AIDEA's proposed Project would be a multi-use, gravel road designed for the movement of goods, services, and equipment for a wide range of both public and private users. AIDEA anticipates that use of the Project would be consistent with the planned use of Alaska DOT&PF's road and that both roads would be designed to serve similar purposes, with AIDEA's Project extending public access west beyond Alexander Creek. Funding for the development and operation of the road are anticipated to be provided via public-private partnerships with AIDEA and resource development companies using similar financing and tolling models to AIDEA's Delong Mountain Transportation System (DMTS) for the Red Dog Mine. The DMTS has resulted in significant socioeconomic and public benefits to the area communities and State through long-term, stable, economic opportunities.

The proposed Project would support AIDEA's mission of promoting the health, security, and general welfare of all people of the State; increasing job opportunities; and otherwise encouraging the economic growth of the State, including the development of its natural resources. The Project is consistent with the Alaska Constitution that directs the State to encourage the development of its resources by making them available for maximum use.

Is any portion of the work already complete?

No

Description of current activity site conditions

Hydrologic and floodplain conditions within the project area are subject to several federal, state, and local requirements, including CWA Section 404 regulation of discharges of dredged or fill material into WOTUS. National Flood Insurance Program (NFIP): Federal Emergency Management Agency (FEMA) floodplain management requirements. Projects within the mapped Special Flood Hazard Area (SFHA) must comply with floodplain regulations, including any no-rise or floodway encroachment provisions. Executive Order 11988 Floodplain Management: Federal agencies must avoid, to the extent practicable, long- and short-term adverse impacts associated with the occupancy and modification of floodplains and avoid direct and indirect support of floodplain development.

The Project area is within the area covered by ADNR's (2011) Susitna Matanuska Area Plan. This plan includes the goal to maintain water quantity and quality sufficient to protect the overall ecosystem integrity as well as the human, fish, and wildlife resources and uses of the region (ADNR 2011:2-27).

The Skwentna and Yentna Rivers have segments with existing water reservations that need to be considered for all development upstream. Additionally, new applications for water reservations can be submitted to ADNR for adjudication following procedures in 11 Alaska Administrative Code (AAC) 93.141-147. Reservations of water are reviewed by the commissioner at least once every 10 years.

In 2008, the Alaska Department of Environmental Conservation (ADEC) assumed primary responsibility for developing and implementing state water quality standards (18 AAC 70), managing nonpoint source pollution; evaluating surface water quality including identifying waters listed under Section 303(d) of the Clean Water Act (CWA) providing quality assurance support; formulating regulations; and administering the Alaska Pollutant Discharge Elimination System (APDES), which regulates discharge water quality.

Alaska's 2024 Integrated Water Quality Monitoring and Assessment Report (ADEC 2024) indicated that no impaired water bodies are located within the study area.

Relevant Site Data, Photographs that Represent Current Site Conditions, or other Relevant Documentation

[RFI_WSA_CORPS_404_R_I_Maps_AP_AllAquaticResources.pdf](#) - 10/07/2026 10:56 AM

[WSA_JNJ_Impacts_20260220_Detailed.xlsx](#) - 10/07/2026 11:03 AM

Comment

NONE PROVIDED

Is this a linear project? (i.e., utility line, road, etc.)

Yes

Linear Feet

415,000

Project Address

[NO STREET ADDRESS SPECIFIED]

[NO CITY SPECIFIED], AK [NO ZIP CODE SPECIFIED]

Visit the link below to help with conversion between DMS and Latitude/Longitude

[DSM - Lat/Long converter](#)

Project Location

61.898455,-151.514055

Visit the following link if you need to convert the lat/long to get the **PLSS information**

[Converter for Section, Township, and Range](#)

PLSS Location (Public Land Survey System)

State Tax Parcel ID	Borough/Municipality	Meridian	Section	Township	Range
NONE PROVIDED	Matanuska-Susitna Borough	Seward	6	17N	8W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	7	17N	8W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	8	17N	8W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	16	17N	8W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	17	17N	8W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	20	17N	8W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	21	17N	8W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	22	17N	8W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	23	17N	8W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	1	17N	9W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	2	17N	9W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	7	18N	9W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	18	18N	9W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	19	18N	9W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	20	18N	9W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	27	18N	9W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	28	18N	9W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	29	18N	9W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	33	18N	9W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	34	18N	9W
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NONE PROVIDED	Matanuska-Susitna Borough	Seward	7	19N	10W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	8	19N	10W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	16	19N	10W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	17	19N	10W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	21	19N	10W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	22	19N	10W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	26	19N	10W

State Tax Parcel ID	Borough/Municipality	Meridian	Section	Township	Range
NONE PROVIDED	Matanuska-Susitna Borough	Seward	27	19N	10W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	35	19N	10W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	36	19N	10W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	1	19N	11W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	5	20N	11W
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NONE PROVIDED	Matanuska-Susitna Borough	Seward	19	21N	12W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	20	21N	12W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	21	21N	12W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	22	21N	12W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	25	21N	12W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	26	21N	12W
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NONE PROVIDED	Matanuska-Susitna Borough	Seward	8	21N	13W
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NONE PROVIDED	Matanuska-Susitna Borough	Seward	11	21N	13W
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NONE PROVIDED	Matanuska-Susitna Borough	Seward	13	21N	13W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	30	22N	13W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	31	22N	13W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	32	22N	13W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	33	22N	13W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	19	22N	14W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	20	22N	14W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	21	22N	14W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	22	22N	14W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	23	22N	14W

State Tax Parcel ID	Borough/Municipality	Meridian	Section	Township	Range
NONE PROVIDED	Matanuska-Susitna Borough	Seward	25	22N	14W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	26	22N	14W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	19	22N	15W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	20	22N	15W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	21	22N	15W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	22	22N	15W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	23	22N	15W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	24	22N	15W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	27	22N	15W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	28	22N	15W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	29	22N	15W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	30	22N	15W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	19	22N	16W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	25	22N	16W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	26	22N	16W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	27	22N	16W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	28	22N	16W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	29	22N	16W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	30	22N	16W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	13	22N	17W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	14	22N	17W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	19	22N	17W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	20	22N	17W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	21	22N	17W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	22	22N	17W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	23	22N	17W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	24	22N	17W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	22	22N	28W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	23	22N	28W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	24	22N	28W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	27	22N	28W
NONE PROVIDED	Matanuska-Susitna Borough	Seward	28	22N	28W

Directions to Site

The start of the project is at lat/long coordinates 61.552897/-150.673167, located approximately 1.4 miles west of Alexander Creek at the west terminus of the proposed DOT&PF West Susitna Access project.

Federal Agency Contact (1 of 1)

Have you been working with anyone in the Federal Agency?

Yes

Federal Contact Role

USACE

Federal Agency Contact

First Name Estrella
Last Name Campellone

Title
NONE PROVIDED

Organization Name
USACE AK RD

Phone Type **Number** **Extension**
Business 9077532518

Email
estrella.f.campellone@usace.army.mil

Dredge Material to be Discharged

Is dredging involved?

No

Tier Analysis

A tier analysis is comprised of a layered approach to determine the need for testing the dredge material to aid in generating physical, chemical, toxicity and bioaccumulation information, but not more information than is necessary to make factual determinations. The tier analysis is a series of tiers (I ♦ IV) or levels of intensity (and cost) of investigation. It is necessary to proceed through the tiers only until information is sufficient to make factual determinations, no further testing is required.

-

Tier I - Site Evaluation and History. The initial tier (Tier I) uses readily available, existing information (including all previous testing). For certain dredge materials with readily apparent potential for environmental impact (or lack thereof), information collected in Tier I may be sufficient for making factual determinations.

- **Tier II - Chemical Testing** is concerned solely with sediment and water chemistry.
- **Tier III - Biological Testing (bioassay and/or bioaccumulation testing)** is concerned with well-defined, nationally accepted toxicity and bioaccumulation testing procedures.
- **Tier IV - Special Studies** allows for case-specific laboratory and field testing, and is intended to for use in unusual circumstances.

For more information regarding a Tier analysis, see below references

-

[EPA Inland Testing Manual](#)

- [USACE Seattle District Civil Works DMMP User Manual](#)

Fill Material to be Discharged

Will Fill Material be Discharged?

Yes

For fill material, identify the material source

17 material site locations located at approximately 1-7 mi intervals (sand, gravel, riprap and small agregages)

Types of material being discharged and the amount of each type (cubic yards)

Type	Cubic Yards
Embankment Borrow	26,113

Type	Cubic Yards
Road Prism Borrow	2,619
Surface Course	654
Stream Bed Material	4,329
Concrete	154

Surface area in (acres or linear feet) of wetlands or other waters filled

Surface Area	Units
66	Acres

Discharge Location Information (1 of 1)

Identify the location and nature of any potential discharge that may result from the proposed project and the location of receiving waters

Discharge Location ID (001, 002, 003, - increment by one)
001

NOTE: if you have a receiving water that is Wetlands, just enter the generic term "Wetlands". Do not enter "Wetlands of Tanana River", for example.

Please select 'Other' if your waterbody is not in the list below.
You can start typing the name of the waterbody to filter the list.

Receiving Waterbody / Wetlands Name
Wetlands

Discharge Location
61.55290,150.67317

Other Pollutant Sources

Contaminated Site Information

Determine if your project is **within 1,500 feet** of a known Alaska DEC Contaminated Site. See the *Alaska DEC Contaminated Web Map* below. This will help you to identify if any potential pollutants/parameters of concern may be present on your project site., see DEC's website:

- Contaminated Sites Web Map
- Contaminated Sites Database Search website

Is the project within 1,500 feet of a known contaminated site?
No

Parameters of Concern that may be present in discharge

Parameter(s) of Concern

Identify the parameters of concern that may be present in your discharge from the dredge and/or fill material.

Note, **TURBIDITY** and **SEDIMENT** are routine parameters associated with dredge and/or fill activities.

Consider if other parameters may be present from past activities in the area such as contaminated site data, impaired waters or other relevant water quality data, or other parameters of concern identified during the application process.

Parameter(s)

Sediment

Turbidity

If known, describe respective concentrations, persistence, and potential impacts to the receiving water and data on parameters that may alter the effects of the discharge to the receiving water

Disturbed areas, including slopes, could result in temporary turbidity or sediment. Disturbed areas would be recontoured to match existing contours and stabilized in a timely manner within the post disturbance growing season as work is completed. All silt fences, curtains, and other structures would be installed properly and maintained in a functioning manner for the life of the construction period where fill material and exposed soils might cause transport of sediment or turbidity beyond the immediate construction site.

Impaired Waters

An **impaired waterbody** are those listed as a **Category 4 [304(b)]** or **Category 5 [303(d)]** in the current EPA approved **Alaska's Integrated Water Quality Monitoring and Assessment Report**.

For the most recently *Approved Integrated Water Quality Monitoring And Assessment Report (Integrated Report)*, see DEC's website:

- [Integrated Water Quality Monitoring And Assessment Report https://dec.alaska.gov/water/water-quality/integrated-report](https://dec.alaska.gov/water/water-quality/integrated-report)

Does a discharge of any parameter identified above occur to an impaired waterbody?

No

If determined necessary and requested by the Department, submit sufficient and credible baseline water quality information for the receiving water which meets the requirements of 18 AAC 70.016(a)(6)(A-C).

Avoidance & Minimization BMPs and Mitigation Measures

Describe how impacts are being avoided and minimized on the project site. Include best management practices (BMPs) for sediment and erosion controls that will be implemented to minimize environmental impacts, and any methods and means proposed to monitor the discharge and the equipment or measures planned to treat, control, or manage the discharge.

Include a description of any methods and means proposed to monitor the discharge and the equipment or measures planned to treat, control, or manage the discharge

Stormwater best management practices (BMPs) would be employed to prevent runoff from carrying sediment into adjacent areas and waterbodies.

Avoidance Measures

- 1) The proposed route has been designed to avoid and minimize impacts on WOTUS (including EFH) to the maximum extent practicable. Design engineers worked with wetland scientists to adjust the route throughout the length of the proposed project to avoid WOTUS, move road crossings perpendicular to stream channels, and cross wetlands at the narrowest possible point in consideration of topography and design criteria constraints. Alignment shifts were completed at multiple intervals throughout the proposed project preliminary alternative design starting in 2019.
- 2) Material sites, the airstrip, the maintenance station (SCMS), and other proposed project facilities have been sited in uplands to the maximum extent practicable.
- 3) Material sites, the airstrip, the maintenance station, and other proposed project facilities are located, to the maximum extent practicable, to avoid impacts on WOTUS. -11-
- 4) The dimensions of the road would be the minimum required to meet the overall proposed project purpose.
- 5) The proposed project is designed to include a 50-foot buffer for anadromous waters and EFH, except where streams would be crossed, to avoid impacts on riparian habitat.

Minimization Measures

- 1) The proposed road alignment is routed to minimize unavoidable impacts on sensitive areas such as WOTUS (including streams and EFH) to the extent practicable and in consideration of design criteria constraints.
 - 2) Existing drainage patterns would be maintained; properly sized and designed culverts would be used in appropriate locations to maintain the natural flow patterns and timing of surface water inflows to adjacent wetlands and waters.
 - 3) Culverts would be sized to reduce maintenance associated with debris clogging and icing, potential glaciation concerns, and sediment deposition; the minimum culvert size proposed is 3 feet in diameter to minimize ponding potential and allow for break-up flow capacity if ice forms in the culverts.
 - 4) The proposed alignment would be routed so stream crossings are as close to perpendicular to the axis of the channel as engineering and routing conditions allow to minimize culvert and bridge length as well as reduce stream impacts.
 - 5) Properly sized and designed culverts would be installed to minimize impacts on fish in fish bearing streams, and all anadromous fish stream crossings would be permitted according to ADF&G Title 16 guidelines. Fish passage culvert diameters would be sized to convey peak 100-year flows.
 - 6) A 24-foot-wide, gravel road section with minimized use of roadside ditches would be used to promote sheet flow of runoff water from the road surface, increasing infiltration and vegetative filtration, thereby minimizing impacts on water quality resulting from concentrated runoff.
 - 7) Roadside ditches would be designed to accommodate maintenance demands and snow storage.
-
- 1) To the extent practicable, laydown/staging areas and other work areas would be located within the road or other proposed project facility footprints, at least 50 feet from wetlands and/or the water's edge. Equipment would remain within the identified proposed project limits, and would not be stored, maintained, or repaired within WOTUS.
 - 2) In locations where the roadway would be constructed over jurisdictional wetlands, geo-fabric may be placed under roadway fill to minimize subsidence and migration of fill material into native soils.
 - 3) Proposed project limits within WOTUS would be clearly identified in the field (e.g., staking, flagging, silt fencing) prior to clearing and construction to -12- ensure avoidance of impacts on WOTUS (including wetlands) beyond the proposed project footprints.
 - 4) A Stormwater Pollution Prevention Plan would be prepared for the proposed project. The plan would clearly describe BMPs required during construction to prevent erosion and runoff from entering aquatic habitats:
 - a. Erosion and sediment control measures (perimeter protection) such as silt fences and straw wattles would be placed around jurisdictional wetlands and waters within the disturbance limit (within 15 feet).
 - b. Temporarily disturbed areas, including slopes, would be recontoured to match existing contours and stabilized in a timely manner within the post disturbance growing season as work is completed. All silt fences, curtains, and other structures would be installed properly and maintained in a functioning manner for the life of the construction period where fill material and exposed soils might cause transport of sediment or turbidity beyond

the immediate construction site.

c. Road embankment side slopes would be stabilized with an Alaska native seed mix as soon as possible after final grading.

d. Standard spill-prevention measures would be implemented during construction; spill clean-up equipment (e.g., oil-absorbent pads) would be available onsite during construction.

5) Locally sourced, contaminant-free embankment and surface materials would be used during construction to avoid introducing contaminated material to the proposed project area.

6) All seeds used for revegetation would be certified to be free of prohibited noxious weeds in accordance with Alaska Administrative Code, Title 11, Chapter 34.

7) Any stream bank affected by the work would be restored and stabilized. The stream bed and banks would be backfilled and restored to the pre-existing course, condition, capacity, and location.

8) Coordination with USFWS would occur prior to construction to avoid and minimize impacts on nesting eagles in compliance with the BGEPA.

9) Timing windows would be implemented to avoid clearing, grubbing, and other site preparation and construction activities during critical life stages for migratory birds, in compliance with the Migratory Bird Treaty Act and BGEPA.

10) ADF&G would determine timing windows during which in-water work would be authorized to minimize potential impacts on sensitive fish life stages such as spawning and/or migration periods. Timing windows for in-water work would be incorporated into the construction schedule.

11) Construction activities would not result in a migration barrier for resident or anadromous fish. Fish passage would be maintained using temporary stream diversion channels, unless otherwise approved by the ADF&G Division of Habitat. Diversion techniques would likely involve creating a temporary diversion channel, plugging the natural channel upstream and downstream of the construction area, and temporarily rerouting flow into the diversion channel.

Mitigation Measures

AIDEA has designed the proposed project to avoid impacts on wetlands and waterbodies wherever practicable, and to minimize impacts where impacts are not avoidable. Due to the number of streams within the proposed project area and the length of the proposed project, complete avoidance of WOTUS is impractical. AIDEA believes that the proposed project would impact 3.18 acres of WOTUS over four HUC10 watersheds. In Alaska, implementation of regulations governing compensatory mitigation is further guided by a document called the [Compensatory Mitigation Considerations for the U.S. Army Corps of Engineers, Alaska District Regulatory](#) (CM Considerations; USACE 2025). Due to the proposed project's small impact on jurisdictional waters, the distribution of the minimal impacts over multiple watersheds, and the extensive avoidance and minimization measures that AIDEA has already performed and committed to, AIDEA proposes no compensatory mitigation for the 3.18 acres of unavoidable impacts of jurisdictional aquatic resource impacts.

Social / Economic Importance

Social or Economic Importance

(18 AAC 70.016(c)(5): Provide information that demonstrates the accommodation of important social or economic development. The applicant shall complete either a social OR economic importance analysis (or both) for each affected community in the area where the receiving water for the proposed discharge is located.

Social Importance Analysis

Infrastructure improvements
Recreational opportunities

Economic Importance Analysis

Access to resources

Describe Social and/or Economic Importance of the project

There is no year-round road network in the Project area; recreational and subsistence access is currently limited to navigable waters, off-road and over-snow vehicle use, air, or foot travel. There are 3 recreational lodges in the Project area, as well as recreational trails and the Iditarod National Historic Trail. The project would significantly improve the accessibility of the area west of the Susitna River for a variety of public uses, including fishing, hunting, and other recreational opportunities. The proposed Project would also increase natural resource development opportunities that are currently inaccessible, including agriculture, timber, minerals, coal, and oil and gas. Lack of surface access to the West Susitna River Basin currently limits development of resources in the area.

Description of Social or Economic Importance, if needed

NONE PROVIDED

Comment

NONE PROVIDED

List of Other Permits or Certificates

*Would include but is not restricted to zoning, building, and flood plain permits.

Include a list of all other federal, interstate, tribal, state, territorial, or local agency authorizations required for the proposed project, including all approvals or denials already received.

Agency	Type of Approval*	Identification Number	Date Applied	Date Approved	Date Denied
NONE PROVIDED	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED

Other Agency or Local Contacts (1 of 1)

Contact Role

OTHER_REG_CNTCT

Other Agency and or Local Contacts

First Name **Last Name**

Joseph Kemp

Title

Project Manager

Organization Name

AIDEA

Phone Type **Number** **Extension**

Business 907-771-3906

Email

jkemp@aidea.org

Attachments

Copy of Federal Application (USACE, EPA, or FERC, etc.)

[POA-2022-00165_SkwentnaRiverPN.pdf - 10/06/2026 01:10 PM](#)

Comment

NONE PROVIDED

Figures and/or Drawings/Plan Sets. To include a map or diagram of the proposed activity site, including the proposed activity boundaries in relation to local streets, roads, and highways.

[POA-2022-00165_20260204_PNFigures.pdf - 10/06/2026 01:10 PM](#)

Comment

NONE PROVIDED

Document Attachments

[WSA SCA PD and App A-D_July2025.pdf - 10/07/2026 01:58 PM](#)

Comment

NONE PROVIDED

Delegation of Authority for Submission of Application

[AIDEA_VHB_delegation-of-authority-401-application signed.pdf - 10/06/2026 01:10 PM](#)

Comment

NONE PROVIDED

As per 18 AAC 15.030 signing of applications, all permit or approval applications must be signed as follows:

- 1) in the case of corporations, by a principal executive officer of at least the level of vice president or his duly authorized representative, if the representative is responsible for the overall management of the project or operation;
- 2) in the case of a partnership, by a general partner;
- 3) in the case of a sole proprietorship, by the proprietor; and
- 4) in the case of a municipal, state, federal or other public facility, by either a principal executive officer, ranking elected official, or other duly authorized employee.

The project proponent hereby certifies that all information contained herein is true, accurate, and complete to the best of my

knowledge and belief. The project proponent hereby requests that the certifying authority review and take action on this CWA 401 certification request within the applicable reasonable period of time.

Revisions

Revision	Revision Date	Revision By
Revision 1	10/6/2026 1:10 PM	rmcnamara@vhb.com rmcnamara@vhb.com
Revision 2	10/7/2026 10:36 AM	rmcnamara@vhb.com rmcnamara@vhb.com

Agreements and Signature(s)

Certification Statement

As per 18 AAC 15.030 signing of applications, all permit or approval applications must be signed as follows:

- 1) in the case of corporations, by a principal executive officer of at least the level of vice president or his duly authorized representative, if the representative is responsible for the overall management of the project or operation;
- 2) in the case of a partnership, by a general partner;
- 3) in the case of a sole proprietorship, by the proprietor; and
- 4) in the case of a municipal, state, federal or other public facility, by either a principal executive officer, ranking elected official, or other duly authorized employee.

The project proponent hereby certifies that all information contained herein is true, accurate, and complete to the best of my knowledge and belief. The project proponent hereby requests that the certifying authority review and take action on this CWA 401 certification request within the applicable reasonable period of time.

Signed By rmcnamara@vhb.com rmcnamara@vhb.com on 10/07/2026 at 1:59 PM
YJY2FiW8nWhp/tFNfGxbvzkAKkCsmKQdWxj/Lr+lhRnxJUIUpmFUC8ptNtGfM+nz3sP7N/EgUN+JLhtSRa5w==