

Appendix G
Agency Involvement

Nenana-Totchaket Road Project
NSHWY00657

Agency Scoping Letter



**AGENCY SCOPING
REQUEST FOR EARLY COORDINATION**

Project Name: Nenana-Totchaket Road
Project Number: NSHWY00657
Project Website: Anticipated January 2022
Comments Due Date: January 20, 2022
Anticipated Level of Documentation: State-Funded Project Environmental Checklist

Dear Agency Staff:

The Alaska Department of Transportation and Public Facilities (DOT&PF) is proposing to construct the Nenana-Totchaket Road from the Nenana River to the Kantishna River. Project will include improving approximately 12 miles of existing road and constructing 20 miles of new road. The proposed Nenana-Totchaket Road Project is entirely State funded.

Please comment on the Project, including your knowledge of resources in the project vicinity under the jurisdiction of your agency or organization, and the potential need for permits and approvals from your agency or organization. To ensure your comments are addressed in the Project’s design and environmental documentation, please refer to the Project by the above name and number, and e-mail your comments to:

Brett Nelson/ Northern Region Environmental Manager
Attn: Bill Sexton/ Environmental Impact Analyst
Alaska Department of Transportation and Public Facilities
2301 Peger Road
Fairbanks, AK 99709
Email: william.sexton@alaska.gov Phone: 907-451-2605

Brett D Nelson

12/23/2021

Brett Nelson/Regional Environmental Manager

Date

Figures 1-5: Project location, vicinity, and proposed alignment figures attached.

I. Purpose and Need of Project:

Construct the Nenana-Totchaket Road from the Nenana River to the Kantishna River. Project will include improving approximately 12 miles of existing road and constructing 20 miles of new road. The Project will provide access for future agricultural development as well as increased access for hunting and fishing in the area.

II. Project Description and Location:

Rehabilitation:

The existing approximately 12 mile roadway will undergo minor re-leveling in areas that have experienced settling, flattening of embankment side slopes, installation of new surface course, clearing of vegetation at slope toes, minor repair of three bridge crossings, and some drainage improvements including culvert replacement and ditch work. Existing turnouts will also be improved, and new turnouts may be constructed as needed to support hauling materials during construction. No realignment of the existing roadway is anticipated.

Extension:

Approximately 20 miles of new road will be constructed to extend the existing Totchaket Road, extending westerly to end at the Kantishna River. The first 16 miles of new road extension will be built within the City of Nenana's existing 500' wide R/W easement, and new R/W would be required for the remainder. For the westernmost section of the proposed extension, there are two Proposed Alternatives:

Alternative 1: In this option the road will maintain the bearing of the preceding road extension alignment, extending westerly an additional 4.5 miles to the East bank of the Kantishna River.

Alternative 2: In this option the road will alter course, taking on a northwesterly bearing. The road would then extend approximately 3 miles over higher ground to terminate at a point further North near the Kantishna River.

Both Alternatives would be constructed entirely above the ordinary high-water limits of the river.

Material Sources:

Material to construct the road are anticipated to be extracted from a combination of; new site development within the floodplains of the Kantishna River near the western end of the new road, utilization of material extracted within upland areas along the R/W alignment, as well as contractor furnished from existing commercially available sources. Due to lack of information for the area, general material extraction zones have been identified for study, as shown in yellow in Figures 2-5. As more detailed data becomes available, the proposed material extraction zones will be refined. Any extraction of materials from the Kantishna River floodplain would occur above ordinary high water and outside of a 1000' buffer from the main channel. Material sources are further described in Section O below.

III. Agency Review (TO BE COMPLETED BY THE RESOURCE OR REGULATORY AGENCY):

1. Responding Agency:
2. Is the information provided herein consistent with agency knowledge?
3. Does this scoping request adequately identify resources and permit needs under your agency's jurisdiction?
4. Will the project result in only minor affects that can be addressed through the use of appropriate BMPs or mitigation measures, as needed?

Please provide any additional project-related comments, recommendations, or resource information below:

IV. Anticipated Environmental Consequences

A. Right-of-Way (R/W)

- | | |
|--|-----|
| 1. Additional ROW required. | Yes |
| 2. Estimated number of parcels impacted. | 36 |
| 3. Property transfer from local, state, or federal agency. | Yes |
| 4. Business or residential relocations. | No |
| 5. Property acquisition from Tribe or ANCSA Corporation. | No |
| 6. Describe: The project will take place within the existing 500' wide R/W easement owned by the City of Nenana, except Alternative 1 and Alternative 2 will require a new R/W easement be established from DNR. | |

B. Socio-Economic

- | | |
|--|-----|
| 1. Project could affect community cohesion, neighborhoods, or other community facilities. | No |
| 2. Project could affect economic development, such as established area businesses. | Yes |
| 3. Project could affect travel patterns and accessibility. | Yes |
| 4. Project could disproportionately affect minorities or disadvantaged persons. | No |
| 5. Project will result in adverse economic impacts. | No |
| 6. Describe: This Project has the potential to improve and expand economic activity and development in the area by providing improved access to natural resources and subsistence. | |

C. Land Use and Transportation Plans

- | | |
|---|-----|
| 1. Project is consistent with land use plans. | Yes |
| 2. Project is consistent with transportation plans. | N/A |
| 3. Describe: Project has purpose of creating access to new agricultural development area. No known transportation plan is currently in place for this new road. | |

D. Historic Properties

- | | |
|--|-------------|
| 1. National Register listed eligible/potentially eligible historic properties in project area. | No |
| 2. Places of traditional religious or cultural importance to Tribes are present in the project area. | Unknown |
| 3. Historic Properties survey may be required to identify if sites are present. | Anticipated |
| 4. Possible adverse effect on historic properties. | Unknown |
| 5. Describe: Cultural resource survey anticipated for project. | |

E. Fish and Wildlife Impacts

- | | |
|---|-------------|
| 1. Project could affect anadromous or resident fish species. | Yes |
| 2. Problem fish pass culverts within the project area. | No |
| 3. Essential Fish Habitat (EFH) present in the project area. | No |
| 4. Project in area of high wildlife/vehicle accidents. | No |
| 5. Project could affect migration corridors or segment habitat. | No |
| 6. Eagle nesting tree(s) or ledge(s) in the project area. | Unknown |
| 7. Construction activities could affect migratory bird nests. | Potentially |
| 8. Describe: The area of the proposed road extension runs through part of the extent of the 2009 Minto Flats South Fire. Preliminary information suggests the area is predominately open black spruce forest. | |

F. Threatened and Endangered (T&E) Species

- | | |
|---|----|
| 1. Listed T&E species in project area. | No |
| 2. Proposed or Candidate species in project area. | No |
| 3. Designated Critical Habitat in the project area. | No |
| 4. Describe: No known threatened or endangered species are present in project area. | |

G. Wetlands and Waterbodies

- | | |
|--|---------|
| 1. Project involves Waters of the U.S. and/or wetlands. | Yes |
| 2. Wetlands survey/delineation may be needed. | Yes |
| 3. USACE authorization anticipated. | Yes |
| 4. Rough estimate on wetland acreage impacted. | Unknown |
| 5. U.S. Coast Guard bridge permit anticipated. | No |
| 6. Designated Wild & Scenic River in project area. | No |
| 7. Describe: NWI data for the area shows the existence of small, discontinuous pockets of wetlands within low elevated areas and adjacent to drainages. Wetland field investigations are anticipated in Spring 2022 to further delineate wetlands and determine the overall scope of affected wetland areas. | |

H. Invasive Species

- | | |
|--|---------|
| 1. Known invasive species infestation in project area. | Unknown |
| 2. Describe: There are no known invasive species inhabiting this region. | |

I. Hazardous Waste/Contaminated Sites

- | | |
|---|-----|
| 1. Known or potentially contaminated sites along project corridor. | No |
| 2. Existing and/or proposed ROW is contaminated. | No |
| 3. Potential for encountering contaminated material during construction. | Yes |
| 4. Describe: While there are no contaminated sites along the project corridor, there are sites located near a potential contractor furnished material site in the Nenana River. | |

J. Air Quality

- | | |
|--|----|
| 1. Project is located in an air quality nonattainment or maintenance area (i.e. – CO or PM-2.5). | No |
| 2. Describe: This project is not located in an air quality nonattainment or maintenance area. | |

K. Floodplains

- | | |
|---|-----|
| 1. Project encroaches (including material sites) into a 100-year floodplain. | Yes |
| 2. Project involves a regulatory floodway. | No |
| 3. Project is located within an area protected by local flood hazard ordinances. | No |
| 4. Flood hazard permit is required from local government. | No |
| 5. Describe: Floodplain extents for the Kantishna River are not well understood. Material extraction may occur within the 100- year floodplain. | |

L. Noise

1. The project is located on new location, would result in substantial changes in vertical or horizontal alignment, or would increase the number of through lanes (Type I project)? No
2. There are noise-sensitive receivers/land uses adjacent to the proposed project? No
3. Describe: This project is primarily an extension of an existing road, providing improved access West of Nenana without scaling the existing access beyond its current level. There are no known noise-sensitive receptors or land uses adjacent to the project.

M. Water Quality

1. Project could involve a public or private drinking source. Yes
2. Project could result in a discharge of storm water to Waters of the U.S. Yes
3. Project could affect a designated impaired water body. No
4. Storm water discharges to a Municipal Separate Storm Sewer System (MS4). No
5. Runoff may mix with discharges from an APDES permitted industrial (MSGP) facility. No
6. Excavation dewatering is anticipated within 1,500 feet of a contaminated site. No
7. Describe: The potential contractor furnished source of material on the Nenana River is the only known potential affecter of local drinking water sources. This source is commercially available and actively mined by the City of Nenana and its operators.

N. Section 6(f)

1. Section 6(f) properties affected by the proposed action. No
2. Describe: The Minto Flats Game Refuge, while none of its land would be used, is located several miles North of the proposed project area.

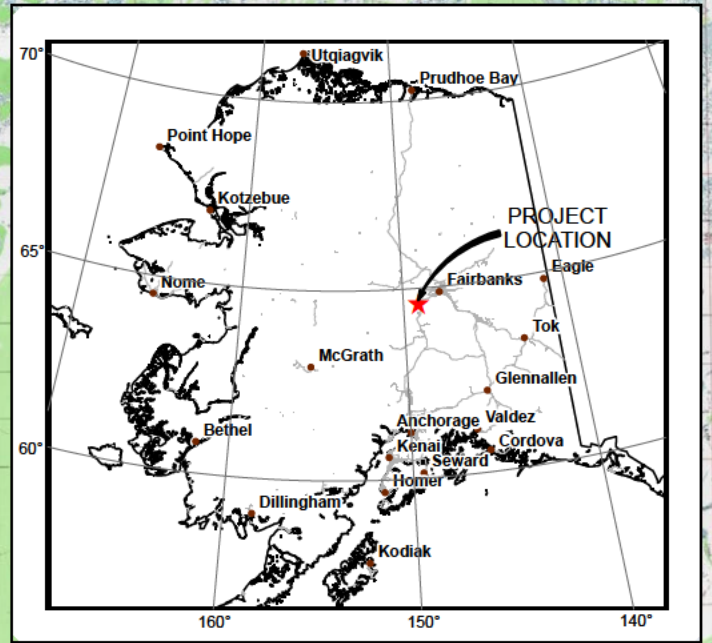
O. Material Source(s) and Staging Areas

1. Potential sites needed for project have been identified. Yes
2. Describe: **Existing Sources:** Along the East bank of the Nenana River there is a commercially available source of alluvial soils, extracted from un-vegetated gravel bars which are self-replenishing. This site is owned and operated by the City of Nenana. **Proposed Sources:** Alluvial material is also widespread along the floodplains of the Kantishna River. Large material extraction zones were identified as potential sites for material sourcing. As more information is gathered, these zones will be refined. Extraction within these zones would occur within smaller 1-10 acre cells, not to exceed a total area of ground disturbance of 20 acres. Extraction anticipated to occur outside a 1000' buffer of the Kantishna at elevations above the river's ordinary high water level (Fig.2-5). Large material extraction zones have also been identified along the proposed road extension, within the existing 500' R/W. Similar to how the existing portion of the Totchaket Road was constructed, the majority of the proposed road extension will use in-situ material, primarily sand located in higher elevation upland areas. Areas in which suitable materials may be found are shown in Fig.2-5, these were determined using aerial imagery and elevation data. The current "material extraction zones" do not represent the actual proposed area of extraction. Actual areas will be determined within these zones and extraction will occur within 1-10 acre cells contained within. Total ground disturbance from material extraction within the R/W is not expected to exceed 50 acres.

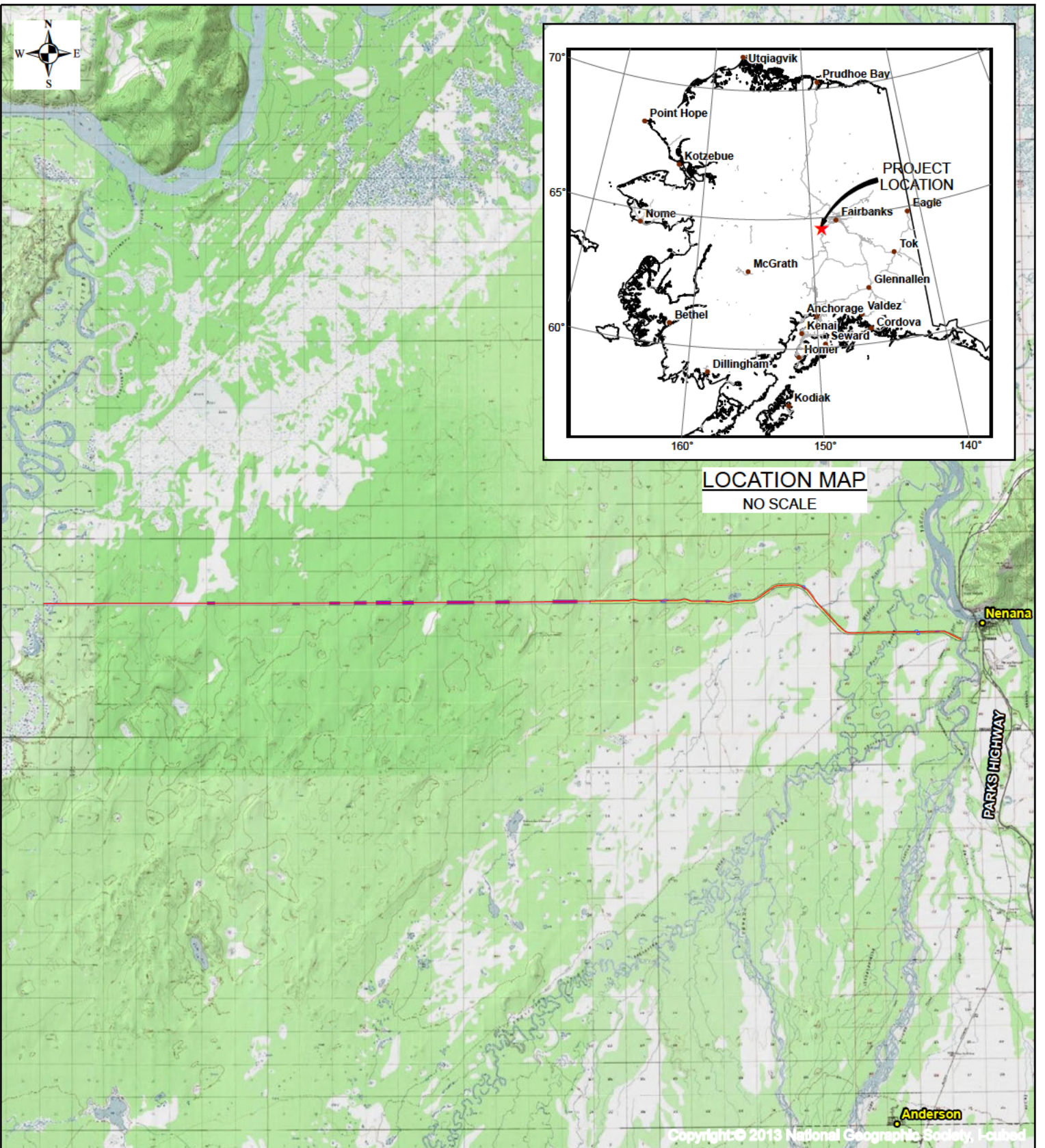
P. Permits and Authorizations

1. USACE, NWP or IP: Yes
2. USCG, Bridge Permit: No
3. ADF&G, Fish Habitat Permit: Yes

- | | |
|---|---------|
| 4. Material Site(s) Sales Agreements/Permits: | Yes |
| 5. Floodplain Permit: | No |
| 6. ADEC, 401 Cert.: | Yes |
| 7. ADEC, Storm Non-domestic Storm Water Disposal Plan Approval: | No |
| 8. APDES, CGP: | Yes |
| 9. ADNR, Land Use Permit: | Yes |
| 10. Borough/City, Development Permit: | Unknown |
| 11. ADEC, Excavation Dewatering Permit: | No |
| 12. ADNR, Temp. Water Use Permit: | Yes |
| 13. ADF&G, Special Area Permit: | No |
| 14. Other(s): | Unknown |



LOCATION MAP
NO SCALE



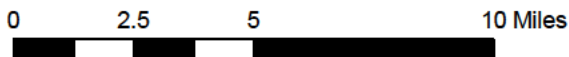
<u>Township and Range</u>	<u>Sections</u>
T4SR12W	7-13
T4SR11W	7-17
T4SR10W	7-12, 14-18
T4SR9W	7-13, 15-18
T4SR8W	15-22

Fairbanks Meridian

VICINITY MAP
NO SCALE

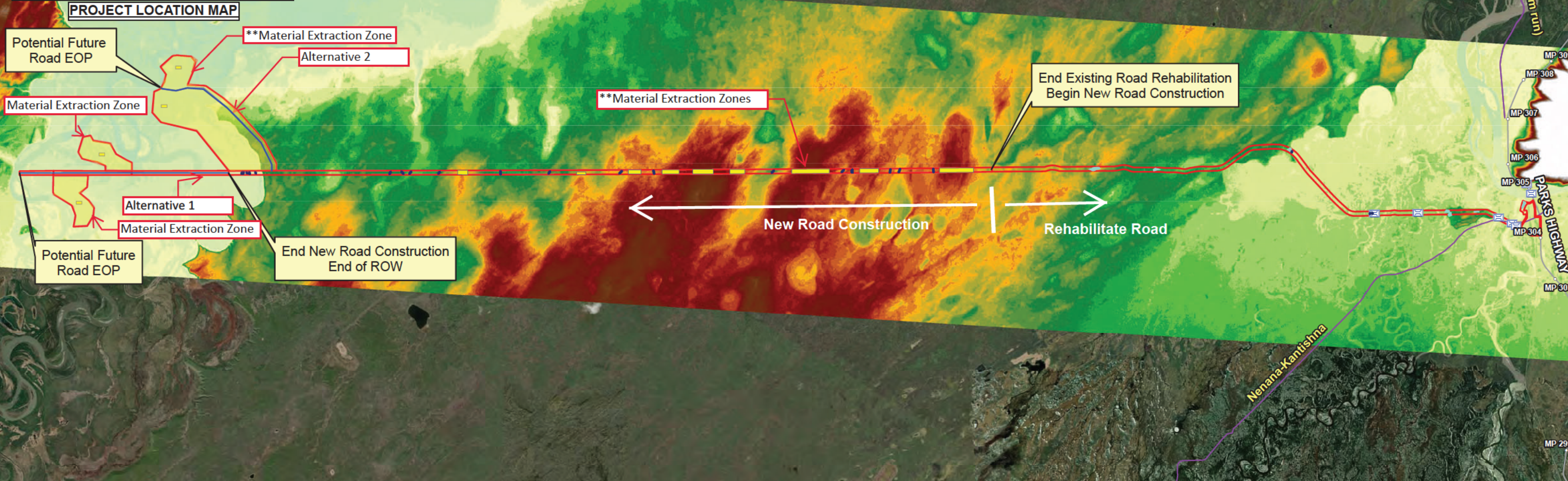
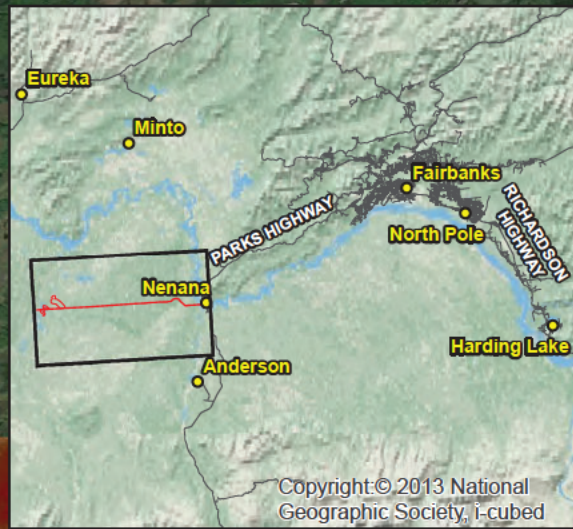
STATE OF ALASKA
Department of Transportation and Public Facilities
2301 Peger Road Fairbanks, AK 99709

NENANA-TOTCHAKET ROAD
NFHWY00657
NENANA, ALASKA



Date: December 2021

Figure 1



Legend

IFSAR Terrain Data (meters)

91 - 93	108 - 111	132 - 135	156 - 159	180 - 183
93 - 96	111 - 114	135 - 138	159 - 162	183 - 186
96 - 99	114 - 117	138 - 141	162 - 165	186 - 189
99 - 102	117 - 120	141 - 144	165 - 168	189 - 192
102 - 105	120 - 123	144 - 147	168 - 171	192 - 195
105 - 108	123 - 126	147 - 150	171 - 174	195 - 198
	126 - 129	150 - 153	174 - 177	198 - 201
	129 - 132	153 - 156	177 - 180	201 - 204

**** MATERIAL EXTRACTION ZONES:** These zones represent general areas in which materials may be extracted. Extraction will occur in smaller 1 to 10 acre cells. The total disturbed area within all extraction zones will not exceed 70 acres, including 50 acres within the road R/W, and 20 acres within/adjacent to the Kantishna River floodplain.

- Bridges
- Alternatives 1&2
- Material Extraction Zone
- Preliminary APE
- RS2477 Trails
- Proposed Culverts
- Material Sites



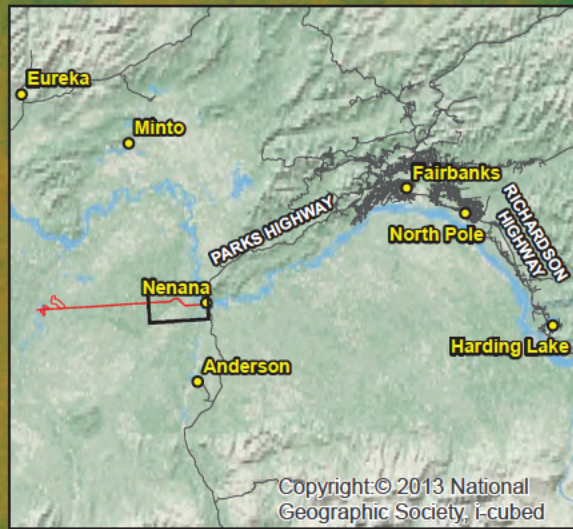
STATE OF ALASKA
Department of Transportation and Public Facilities
2301 Peger Road Fairbanks, AK 99709

Date: December 2021

Figure 2

Nenana Totchaket Road

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PROJECT LOCATION MAP

City owned, existing Material Source

existing road, proposed haul route

existing trail, proposed haul route

EXISTING DREDGE SITE AND HAUL ROUTE

BOP

Legend

IFSAR Terrain Data (meters)

108 - 111	132 - 135	156 - 159	180 - 183
111 - 114	135 - 138	159 - 162	183 - 186
114 - 117	138 - 141	162 - 165	186 - 189
117 - 120	141 - 144	165 - 168	189 - 192
120 - 123	144 - 147	168 - 171	192 - 195
123 - 126	147 - 150	171 - 174	195 - 198
126 - 129	150 - 153	174 - 177	198 - 201
129 - 132	153 - 156	177 - 180	201 - 204

- Bridges
- Alternatives 1&2
- Material Extraction Zone
- Preliminary APE
- RS2477 Trails
- Proposed Culverts
- Existing Material Sites



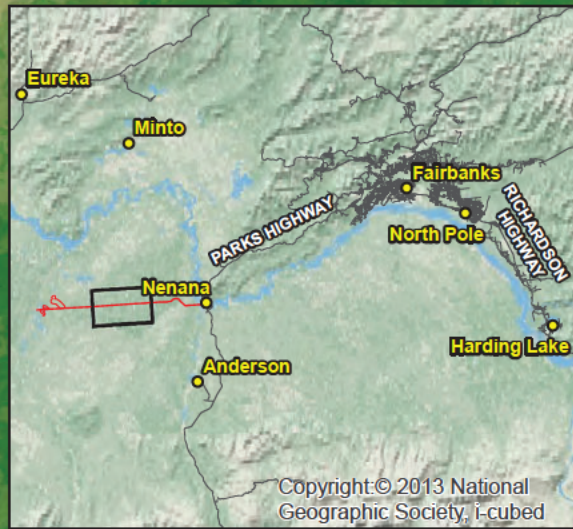
STATE OF ALASKA
Department of Transportation and Public Facilities
2301 Peger Road Fairbanks, AK 99709

Date: December 2021

Figure 3

Nenana Totchaket Road

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End Existing Road Rehabilitation
Begin New Road Construction

**Material Extraction Zones

**Material Extraction Zones

← New Road Construction →
→ Rehabilitate Road ←

Legend

IFSAR Terrain Data (meters)

91 - 93	108 - 111	132 - 135	156 - 159	180 - 183
93 - 96	111 - 114	135 - 138	159 - 162	183 - 186
96 - 99	114 - 117	138 - 141	162 - 165	186 - 189
99 - 102	117 - 120	141 - 144	165 - 168	189 - 192
102 - 105	120 - 123	144 - 147	168 - 171	192 - 195
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	126 - 129	150 - 153	174 - 177	198 - 201
	129 - 132	153 - 156	177 - 180	201 - 204

**** MATERIAL EXTRACTION ZONES:** These zones represent general areas in which materials may be extracted. Extraction will occur in smaller 1 to 10 acre cells. The total disturbed area within all extraction zones will not exceed 70 acres, including 50 acres within the road R/W, and 20 acres within/adjacent to the Kantishna River floodplain.

- Bridges
- Road_Extensions
- Material Extraction Zone
- Preliminary APE
- RS2477 Trails
- Proposed Culverts
- Existing Material Sites



STATE OF ALASKA
Department of Transportation and Public Facilities
2301 Peger Road Fairbanks, AK 99709

Date: December 2021

Figure 4

Nenana Totchaket Road

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Potential Future Road EOP

**Material Extraction Zone

Alternative 2

**Material Extraction Zone

**Material Extraction Zone

Alternative 1

End New Road Construction
End of Existing ROW

Potential Future Road EOP

**Material Extraction Zone

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Legend

IFSAR Terrain Data (meters)

91 - 93	108 - 111	132 - 135	156 - 159	180 - 183
93 - 96	111 - 114	135 - 138	159 - 162	183 - 186
96 - 99	114 - 117	138 - 141	162 - 165	186 - 189
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- Bridges
- Alternatives 1&2
- Material Extraction Zone
- Preliminary APE
- RS2477 Trails
- Proposed Culverts
- Existing Material Sites



STATE OF ALASKA
Department of Transportation and Public Facilities
2301 Peger Road Fairbanks, AK 99709

Date: December 2021

Figure 5

Nenana Totchaket Road

Scoping Letter Responses

From: [Brase, Audra L \(DFG\)](#)
To: [Sexton, William J \(DOT\)](#)
Cc: [Nelson, Brett D \(DOT\)](#)
Subject: RE: Nenana-Totchaket Road Project Scoping - ADF&G comments
Date: Wednesday, January 12, 2022 10:52:38 AM
Attachments: [image001.png](#)
[Nen-Tot_Scoping_Ltr.pdf](#)

Hi Bill,

ADF&G has reviewed this scoping document and here are our initial comments:

1. ADF&G does not support the 20 acres of material sites adjacent to the Kantishna River - a river known to support Chinook, chum and coho salmon, and many species of resident fish. The scoping letter states that these material sites will be located 1000' from the river and above OHW. However, the aerial imagery clearly shows several relic channels/oxbows within the proposed material sites. These relic channels may still flood during OHW events therefore we suggest further analysis by ADOT&PF engineers/ hydrologists.
2. ADF&G Fish Habitat Permits will be required for any water withdrawals and/or other work within fish bearing waterbodies.
3. There are many local access trails in this area (primarily winter) and the existing road system has caused concerns with the locals of Nenana. The Minto/Nenana Fish and Game Advisory Committee has continually expressed concerns about the increased access bringing in more nonlocal hunters. This Advisory Committee has submitted proposals to the Alaska Board of Game because of these concerns. ADF&G suggests that ADOT&PF solicit input from the local Nenana community to identify existing trails, and design the proposed road to accommodate trail crossings and increased access (parking areas/ turnarounds).

Thank you for the opportunity to comment.

Audra Brase
Regional Supervisor
ADF&G Habitat - Fairbanks
907-459-7282

From: Sexton, William J (DOT) <william.sexton@alaska.gov>
Sent: Thursday, December 23, 2021 11:06 AM
Cc: sturges.susan@epa.gov; ak_fisheries@fws.gov; akr.prd.section7@noaa.gov; ellen.h.lyons@usace.army.mil; jessica.jobee@usda.gov; Cole, Cory - NRCS, Palmer, AK <cory.cole@usda.gov>; Edwards, Alice L S (DEC) <alice.edwards@alaska.gov>; Heil, Cynthia L (DEC) <cindy.heil@alaska.gov>; McCabe, Gene C (DEC) <gene.mccabe@alaska.gov>; Bates, Randy W (DEC) <randy.bates@alaska.gov>; McGee, Chandra J (DEC) <chandra.mcgee@alaska.gov>; Rypkema, James (DEC) <james.rypkema@alaska.gov>; Wiegers, Janice K (DEC) <janice.wiegers@alaska.gov>; Fish, James T (DEC) <james.fish@alaska.gov>; Larson, Tiffany M (DEC) <tiffany.larson@alaska.gov>; Bruning, Darren L (DFG) <darren.bruning@alaska.gov>; Brase, Audra L (DFG) <audra.braser@alaska.gov>; Wait, Alexander J (DNR) <aj.wait@alaska.gov>; Leinberger, Dianna L (DNR) <dianna.leinberger@alaska.gov>; Smith, Julie A (DNR) <julie.smith@alaska.gov>; Goodrum,

Brent W (DNR) <brent.goodrum@alaska.gov>; Richie, Melissa A (DNR) <melissa.richie@alaska.gov>; nenanamayor@gmail.com; victor.joseph@tananachiefs.org; marundej@doyon.com; walexander@togcorp.net; supt@nenanalynx.org; ta.nnc@outlook.com; ta.nenana.ak@gmail.com; Aditi Shenoy <aditi.shenoy@gmail.com>; Jodie Anderson <jmanderson@alaska.edu>; lhaas@agdc.us; gallaghera@akrr.com; duberk@akrr.com; gratrixk@akrr.com; Schacher, Sarah E (DOT) <sarah.schacher@alaska.gov>; Nelson, Brett D (DOT) <brett.nelson@alaska.gov>; Hutchinson, Jonathan J (DOT) <jonathan.hutchinson@alaska.gov>; McKinney, Holly Jean (DOT) <holly.mckinney@alaska.gov>; bob_henszey@fws.gov; sean.eagan@noaa.gov

Subject: Nenana-Totchaket Road Project Scoping

All,

The attached scoping letter and accompanying figures are to provide you with an overview of the proposed project, Nenana-Totchaket Road, State project number NSHWY00657. Please review and send any comments you have on the project so that we may evaluate and consider them in our environmental document for this project.

Thank you for taking the time to review and respond.

Bill Sexton
Environmental Impact Analyst II
Alaska DOT&PF

2301 Peger Road / Fairbanks, AK 99709
Office (907)451-2605



January 19, 2022

Mr. Bill Sexton
Alaska DOT&PF, Environmental Impact Analyst II
2301 Peger Road
Fairbanks, AK 99709
william.sexton@alaska.gov

ENGINEERING
TEL 907.265.3095

RE: Nenana-Totchaket Road Project Scoping Comments (NSHWY00657)

Dear Mr. Sexton:

The Alaska Railroad Corporation (ARRC) has reviewed and the Scoping Letter figures associated with the Alaska Department of Transportation and Public Facilities (ADOT&PF) Nenana-Totchaket Road Project (NSHWY00657) provided on December 23, 2021. The Project is proposing to provide roadway access from the Nenana River to the Kantishna River by improving approximately 12 miles of existing road and constructing 20 miles of new road.

ARRC has the following comments:

1. The following at-grade railroad crossings will be impacted by this project:
 - a. The 10th Avenue crossing at ARRC MP 410.68 (DOT #910231V). It is anticipated that traffic over this crossing will increase significantly.
 - b. The Marine Ways Access crossing at ARRC MP 411.38 (DOT #868363T). Based on the proposed plans, this crossing will be used heavily during construction for material hauling.

Both of these crossings are currently protected with passive signage and include timber crossing surfaces. Due to the anticipated increased/change in usage for these crossing as a result of the Nenana-Totchaket Road Project, a Diagnostic Team Study must be performed in accordance with the 1988 Alaska Policy on Railroad/Highway Crossings. This study will evaluate safety conditions at these crossing and other nearby crossings and provide recommendations for warning devices, sight triangles, and surface improvements.

2. The State of Alaska has long-term plans to extend the railroad west and north from Nenana to the North Slope, as well as west to Nome. These conceptual alignments should be taken into consideration with the overall development west of the Nenana River. The material site shown is located immediately to the west of an old Wye track. This is the proposed point of connection for the eventual extension of the ARRC to the North Slope and Ambler Mining District, as well as communities located on the west coast including Nome. Although these plans are conceptual in nature, we are concerned that the development of a material source in this location not only will

make the eventual track construction more complicated, but may affect the river behavior near this location making the eventual crossing of the Nenana River by ARRC more complicated and significantly more expensive.

3. Access to the site goes directly through ARRC Reserve Land which is currently leased to the City of Nenana on the east side of the Nenana River. Permitting for the use of this road will need to be addressed and coordinated with the City of Nenana and ARRC.

Please continue to keep ARRC informed as the project progresses and don't hesitate to reach out with any questions.

Sincerely,



Brian Lindamood
Vice President, Chief Engineer

- cc. Kate Dueber, ARRC Manager ROW and Public Projects
Andy Donovan, ARRC Director Real Estate Leasing/Permitting
Tim Sullivan, ARRC Director External Affairs
Kristen Gratrix, ARRC Manager Real Estate Contracts
Andrew Gallagher, ARRC Engineer, Public Projects

From: [Joshua Verhagen](#)
To: [Sexton, William J \(DOT\)](#)
Subject: Re: Nenana-Totchaket Road Project Scoping
Date: Thursday, December 23, 2021 11:52:56 AM
Attachments: [image001.png](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Wow! That's incredible. Where did the funding come from? I didn't see this in the Governor's budget.

Josh

On Thu, Dec 23, 2021 at 11:37 AM Sexton, William J (DOT) <william.sexton@alaska.gov> wrote:

Hey Josh,

Thanks for the quick response. Yes, this project is entirely funded by the State. I look forward to any comments and insights you have.

Happy Holidays,

Bill

From: Joshua Verhagen <nenanamayor@gmail.com>
Sent: Thursday, December 23, 2021 11:31 AM
To: Sexton, William J (DOT) <william.sexton@alaska.gov>
Subject: Re: Nenana-Totchaket Road Project Scoping

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Morning Bill,

Thanks, this is exciting, I'll do a thorough review and get back with you.

Does this accurately state that this IS entirely funded, or just that it's being proposed to be funded by the state?

Thanks,

Josh

On Thu, Dec 23, 2021 at 11:07 AM Sexton, William J (DOT) <william.sexton@alaska.gov> wrote:

All,

The attached scoping letter and accompanying figures are to provide you with an overview of the proposed project, Nenana-Totchaket Road, State project number NSHWY00657. Please review and send any comments you have on the project so that we may evaluate and consider them in our environmental document for this project.

Thank you for taking the time to review and respond.

Bill Sexton

Environmental Impact Analyst II

Alaska DOT&PF

2301 Peger Road / Fairbanks, AK 99709

Office (907)451-2605



Joshua Verhagen

Mayor, City of Nenana

723 A st, Nenana, AK 99760

Office (907) 888-5036 or Cell (907) 888-5037

“Improving Nenana, one day at a time”

--

Joshua Verhagen

Mayor, City of Nenana

723 A st, Nenana, AK 99760

Office (907) 888-5036 or Cell (907) 888-5037

“Improving Nenana, one day at a time”



From: [Sexton, William J \(DOT\)](#)
To: [Alimi, Adeyemi S \(DEC\)](#)
Cc: [Nelson, Brett D \(DOT\)](#); [Heil, Cynthia L \(DEC\)](#)
Subject: RE: Nenana-Totchaket Road Project Scoping
Date: Wednesday, January 5, 2022 10:41:00 AM
Attachments: [image001.png](#)

Hey Yemi,

Thank you for the quick response to our request for comments. To dispose of organic debris on this project we will either shred/hydroaxe vegetation or, in the case of larger timber, salvage for local use. I'll let you know if I or anyone else on the project thinks of any questions as the planning phase progresses.

Thanks,
Bill

From: Alimi, Adeyemi S (DEC) <adeyemi.alimi@alaska.gov>
Sent: Wednesday, January 5, 2022 10:06 AM
To: Sexton, William J (DOT) <william.sexton@alaska.gov>
Cc: Nelson, Brett D (DOT) <brett.nelson@alaska.gov>; Heil, Cynthia L (DEC) <cindy.heil@alaska.gov>
Subject: RE: Nenana-Totchaket Road Project Scoping

Dear Bill Sexton,

The Alaska Department of Transportation and Public Facilities (DOT&PF) has requested Alaska Department of Environmental Conservation (ADEC) to comment on the proposed construction of the Nenana-Totchaket Road from the Nenana River to the Kantishna River.

Thank you for the opportunity to comment on the proposed project. The following comments are limited to the Air Quality Division. Other divisions within ADEC will need to respond within their areas of expertise.

ADEC agrees with DOT&PF that the proposed project is not located within a non-attainment or maintenance area for air quality control under the Clean Air Act. Therefore, in accordance with 40 CFR 93.126, the project does not require a conformity analysis under Transportation Conformity regulations.

-
However, if open burning is chosen as the preferred method of disposal of organic debris, DOT&PF or their contractor must use "reasonable procedures to minimize adverse environmental effects and limit the amount of smoke generated" as well as get any applicable permits. A complete description of the open burn information including policies can be found at: <http://dec.alaska.gov/air/air-permit/open-burn-info/>

Also, any construction activities should follow all reasonable precautions in accordance with 18 AAC 50.045(d) to prevent particulate matter from being emitted into the ambient air.

If you have any questions, please do not hesitate to contact me.

Sincerely,

-
Adeyemi Alimi (Yemi)
State of Alaska, Department of Environmental Conservation
Air Quality Division
Non-Point Mobile Sources Section
adeyemi.alimi@alaska.gov
907-269-6953 (Office)

From: Sexton, William J (DOT)

Sent: Thursday, December 23, 2021 11:06 AM

Cc: sturges.susan@epa.gov; ak_fisheries@fws.gov; akr.prd.section7@noaa.gov; ellen.h.lyons@usace.army.mil; jessica.jobe@usda.gov; Cole, Cory - NRCS, Palmer, AK <cory.cole@usda.gov>; Edwards, Alice L S (DEC) <alice.edwards@alaska.gov>; Heil, Cynthia L (DEC) <cindy.heil@alaska.gov>; McCabe, Gene C (DEC) <gene.mccabe@alaska.gov>; Bates, Randy W (DEC) <randy.bates@alaska.gov>; McGee, Chandra J (DEC) <chandra.mcgee@alaska.gov>; Rypkema, James (DEC) <james.rypkema@alaska.gov>; Wiegers, Janice K (DEC) <janice.wiegers@alaska.gov>; Fish, James T (DEC) <james.fish@alaska.gov>; Larson, Tiffany M (DEC) <tiffany.larson@alaska.gov>; Bruning, Darren L (DFG) <darren.bruning@alaska.gov>; Brase, Audra L (DFG) <audra.braser@alaska.gov>; Wait, Alexander J (DNR) <aj.wait@alaska.gov>; Leinberger, Dianna L (DNR) <dianna.leinberger@alaska.gov>; Smith, Julie A (DNR) <julie.smith@alaska.gov>; Goodrum, Brent W (DNR) <brent.goodrum@alaska.gov>; Richie, Melissa A (DNR) <melissa.richie@alaska.gov>; nenanamayor@gmail.com; victor.joseph@tananachiefs.org; marundej@doyon.com; walexander@togcorp.net; supt@nenanalynx.org; ta.nnc@outlook.com; ta.nenana.ak@gmail.com; Aditi Shenoy <aditi.shenoy@gmail.com>; Jodie Anderson <jmanderson@alaska.edu>; lhaas@agdc.us; gallaghera@akrr.com; duberk@akrr.com; gratrixk@akrr.com; Schacher, Sarah E (DOT) <sarah.schacher@alaska.gov>; Nelson, Brett D (DOT) <brett.nelson@alaska.gov>; Hutchinson, Jonathan J (DOT) <jonathan.hutchinson@alaska.gov>; McKinney, Holly Jean (DOT) <holly.mckinney@alaska.gov>; bob_henszey@fws.gov; sean.eagan@noaa.gov

Subject: Nenana-Totchaket Road Project Scoping

All,

The attached scoping letter and accompanying figures are to provide you with an overview of the proposed project, Nenana-Totchaket Road, State project number NSHWY00657. Please review and send any comments you have on the project so that we may evaluate and consider them in our environmental document for this project.

Thank you for taking the time to review and respond.

Bill Sexton
Environmental Impact Analyst II

Alaska DOT&PF

2301 Peger Road / Fairbanks, AK 99709

Office (907)451-2605



From: [Longacre, Rachel L \(DNR\)](#)
To: [Sexton, William J \(DOT\)](#)
Subject: Agency Scoping: Nenana-Totchaket Road extension NSHWY00657
Date: Tuesday, February 1, 2022 4:07:38 PM
Attachments: [Nen-Tot_Scoping_Ltr.pdf](#)

The Division of Mining, Land and Water (DMLW) has the following comments regarding NFHWY00657, the Nenana-Totchaket Road Project Scoping:

The information provided by DOT on the proposed road extension is consistent

As noted in the scoping letter, an easement issued to the City of Nenana already exists for much of the area proposed to be developed: ADL 409501. Please coordinate with the City of Nenana for development of the existing easement. Please contact DNR-DMLW respecting disposition of any timber or materials.

The Nenana-Totchaket ROW is not a continuous 500' in width throughout the project Area. The University of Alaska owns the East 1/2 of Section 10, Township 4 South, Range 9 West, Fairbanks Meridian, and granted a 100' public access easement via Inst. 2014-000204-0, NRD, and documented this via Record of Survey, Plat No. 2014-6, NRD. DOT should consider keeping the entire 500' corridor intact as part of this project and work with UA and DNR to acquire additional ROW.

An additional public access easement, 100' wide (ADL 413135) runs diagonally through the project area. The path of it also crosses the Uni land.

The scoping letter identifies two alternative routes to reach the Kantishna River. Either route would require an additional easement. In both cases, DMLW-NRO would need an application for an easement to authorize additional road development across both general state land and Tanana Valley State Forest (which DMLW-NRO would need to coordinate with DNR-DOF). The typical timeframe given for the easement adjudication process is 6-8 months.

DOT will need to coordinate with DMLW-NRO regarding identifying material extraction areas and how to authorize them for this project. Material sources identified outside of the authorized right-of-way will require designation by DMLW. The typical timeframe given for the material site designation process is 9-12 months.

The material source identified as owned by the City of Nenana is a designated material site on state lands managed by DMLW. The material site is located within the ordinary high water of the Nenana River. The uplands of this material site are on lands leased by the City of Nenana from the Alaska Railroad Corporation. To obtain material from this material source, a material sale contract from DMLW will need to be obtained. Please coordinate with DMLW-NRO for material from this location.

Rachel Longacre, Section Chief
DNR, DMLW, Land Conveyance Section

550 West 7th Avenue, Ste 640, Anchorage, Alaska 99501

Desk: (907) 269-8596 • Fax: (907) 269-8916

<https://dnr.alaska.gov/mlw/landsales>



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

NORTHERN REGION/DIVISION OF FORESTRY

3700 Airport Way
Fairbanks, Alaska 99709-4699
Main: 907.451.2660
Fax: 907.322.4537

January 10, 2022

Dear Mr. Nelson

Thank you for the opportunity to comment on the Nenana-Totchaket Road. In the purpose and need section you state that the road will provide access for future agricultural development and hunting and fishing purposes. We feel that you could add forest development projects to the intended purpose. The proposed road passes through forest classified land and if extended to the east bank of the Kantishna river, would pass through unit 2A of the Tanana Valley State Forest (map attached). DOF would like to use this proposed road for timber harvest and forest development projects. This project would open access to a new part of the state forest that we currently don't have access to. Opening access to this portion of the state forest could provide additional feed stock to the forest products industry in the lower Tanana region. More forest development projects would mean log trucks and related logging equipment would need to use this road for access. If this project is completed, it will be DOF's intent to build additional roads to the north and south of this ROW, within the boundary of the state forest to access additional stands for commercial harvest.

Some of the proposed material extraction zones are within the boundaries of the state forest. We would like to salvage any commercial timber that would need to be cleared prior to the development of any material sites. Additionally, DOF would like to salvage any commercial timber that would need to be cleared for the development of the ROW.

DOF accesses timber sales on a winter road located at the beginning of this proposed project. The beginning of the winter road is approximately ½ mile from the west bank of the Nenana River. We need continued access to those sales on that winter logging road and while they are active, logging trucks will be entering and exiting at that location. We currently have six timber sale units on our harvest schedule located on that road (map attached).

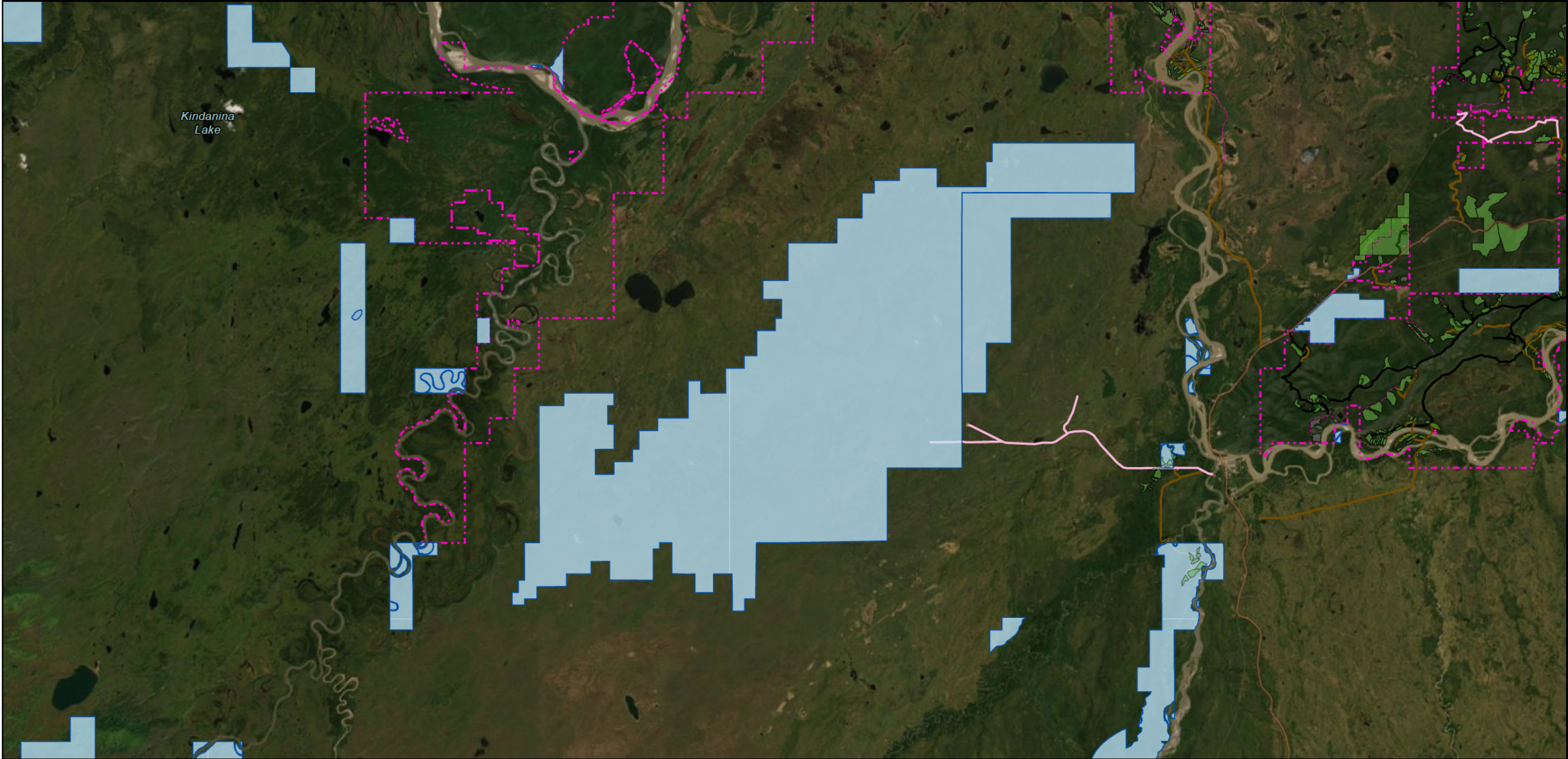
DOF has a ROW permit on the North Commissioner Line which intersects this proposed road (ADL 414604). The intent of the ROW is to access northern portions of unit 2A, western portions of unit 2E and unit 2D of the TVSF. DOF will want to retain that ROW for the North Commissioners line.

DOF supports this proposed project and looks forward to seeing this project successfully completed.

Sincerely,
Jeremy Douse
Northern Region Forester

CC: Bill Sexton

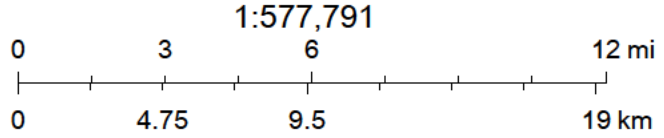
AK DNR Forestry Resources



1/7/2022, 4:28:50 PM

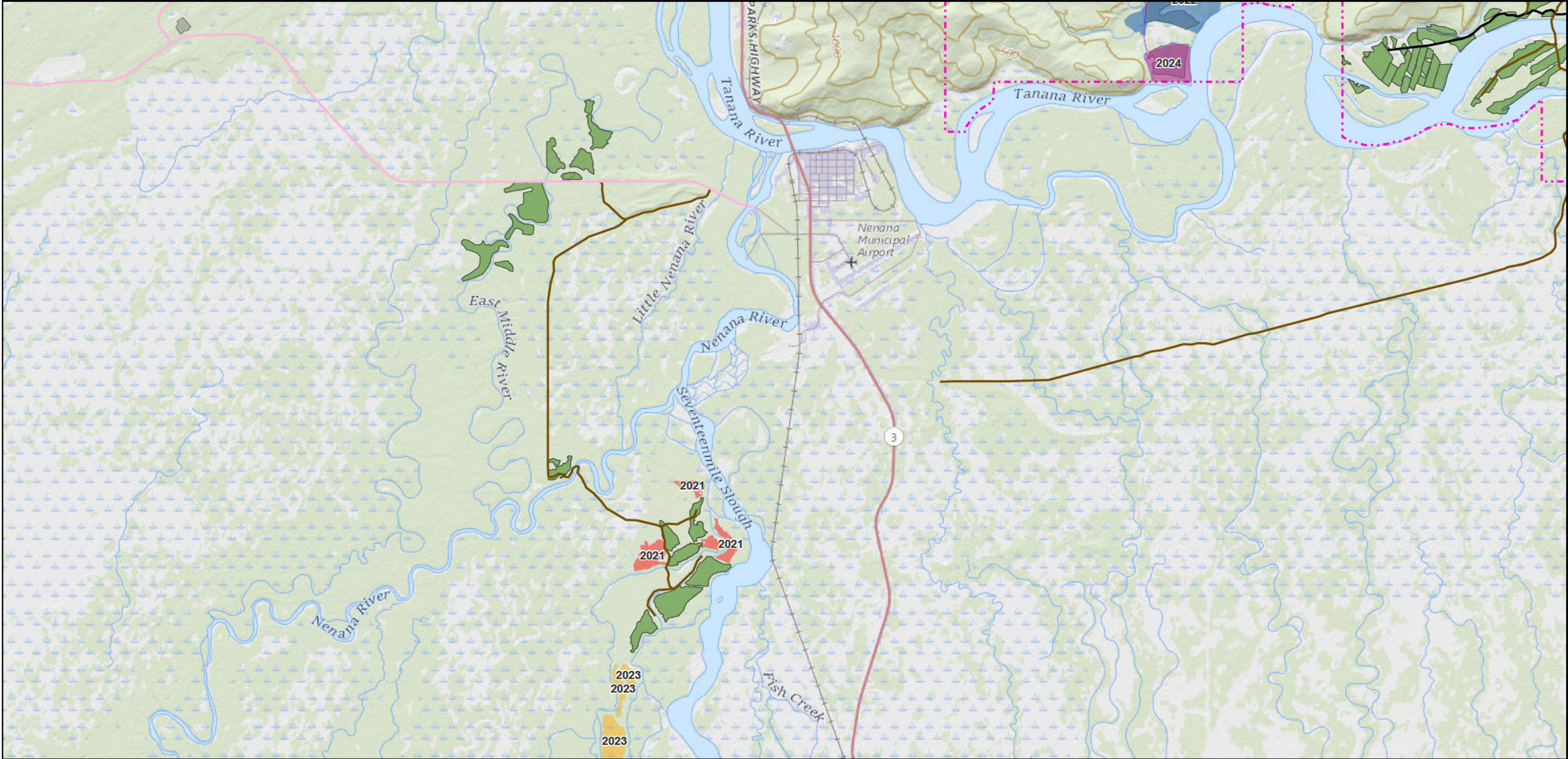
- Reforestation Public View
- Alaska Forest Classified Lands - Alaska_Forest_Classified_Lands
- Forestry Roads Public View
- Active
- Inactive

- Proposed
- Non-FRPA
- Alaska DNR Timbersales Public View
- State Forest Boundary Public View
- Resource Management Boundaries



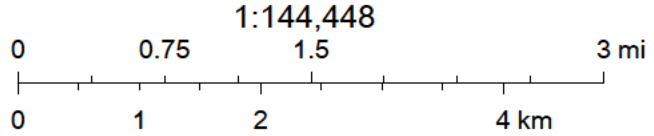
Earthstar Geographics, State of Alaska, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

AK DNR Forestry Resources



1/10/2022, 11:23:02 AM

Forestry Roads Public View	Five Year Schedule of Timber Sales Public View	Reforestation Public View
Active (Black line)	Schedule Year 2 (Red)	Alaska DNR Timbersales Public View (Grey)
Inactive (Brown line)	Schedule Year 3 (Blue)	State Forest Boundary Public View (Dashed Pink)
Proposed (Dashed Pink line)	Schedule Year 4 (Yellow)	Resource Management Boundaries (Green Outline)
Non-FRPA (Pink line)	Schedule Year 5 (Purple)	



USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset;



Mr. Brett Nelson/ Northern Region Environmental Manager
Attn: Mr. Bill Sexton/ Environmental Impact Analyst
Alaska Department of Transportation and Public Facilities
2301 Peger Rd., Fairbanks, AK 99709

January 20th, 2022

Re: Nenana-Totchaket Road Project (Project# NSHWY00657)

Dear Mr. Nelson and Mr. Sexton,

I would like to provide some information regarding invasive plants in the vicinity of the existing road from Nenana to the Totchaket area as it relates to the Nenana-Totchaket Rd which will be constructed between Nenana and the Kantishna River as described in the project scoping letter.

I have made observations of extensive, dense stands of white sweet clover (*Melilotus alba*), and large patches of bird vetch (*Vicia cracca*) in the vicinity of the Nenana boat launch (64.556568, -149.113138), along 10th ave. leading up to Totchaket Rd (64.552765, -149.101930), and in several areas along the existing 12-mile long Nenana-Totchaket Rd (e.g. white sweet clover was found as far as 64.584894, -149.444778). Many of the infestations that I observed along the Nenana-Totchaket Rd were found to be spreading from existing turnouts and other disturbed areas. I made these observations in summer 2021. Some of the proposed material extraction zones that are demarcated in Fig.4 in the project scoping letter are very likely to contain white sweet clover or bird vetch. These are both highly invasive plants that spread easily, have persistent seed banks, and are very difficult to eradicate once established. The Nenana-Totchaket Rd will no doubt serve as a conduit and the material extraction zones as potential vector sites, for the spread of these invasive plants from Nenana deeper into the Nenana-Totchaket area towards the Kantishna River, in an area that is important for subsistence activities. Furthermore, the spread of invasive plants would compromise the quality of the agricultural land that the road is intended to serve. Therefore, it would be prudent to manage outlying infestations of these highly invasive plants in order to prevent their spread and protect natural areas, at the outset of project implementation.

A detailed survey of the invasive plants in the Nenana-Totchaket Rd area and vicinity has not as yet been conducted to the best of my knowledge, and I would consider this a priority in the 2022 season. We recommend the following steps to prevent the spread of high priority invasive plants by the construction of the Nenana-Totchaket Rd:

(1) identify and map the current infestations of white sweet clover, bird vetch, and other high priority invasive plants between 10th Ave. in Nenana and the end of the existing 12-mile section of the Nenana-Totchaket Rd, (2) identify and map invasive plants present in the proposed material extraction sites, (3) conduct targeted control of invasive plants (e.g. control white sweet clover at material extraction sites), (4) implement best management practices to prevent the spread of invasive plants during all project operations, and (5) install signage and conduct outreach to alert the public of the presence of invasive plant infestations and how to prevent their spread. FSWCD would be happy to assist in the planning and implementation of these important activities. We believe that preventing the spread of invasive plants at the outset of the Nenana-Totchaket Rd Project would be an ecologically and economically beneficial step to take.

Thank you for your attention in this matter, and please feel free to contact me with any questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Aditi Shenoy".

Ms. Aditi Shenoy, PhD.
Invasive Species Specialist
Fairbanks Soil and Water Conservation District
aditi.shenoy@gmail.com

From: [Ajmi, Amal R](#)
To: [Sexton, William J \(DOT\)](#)
Cc: [Henszey, Bob](#); [Brase, Audra L \(DFG\)](#); [Leinberger, Dianna L \(DNR\)](#); [LaCroix, Matthew](#); ellen.h.lyons@usace.army.mil; nenanamayor@gmail.com
Subject: USFWS Comment for Nenana-Totchaket Road Project Scoping
Date: Wednesday, January 19, 2022 9:06:13 AM
Attachments: [Nenana-TotchaketRoad_Historical_USFWS_Comments.pdf](#)
[19January2022_USFWS-Comments_Nenana-Totchaket_Road_Scoping_Request.pdf](#)

You don't often get email from amal_ajmi@fws.gov. [Learn why this is important](#)

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Good Morning. Please find attached the USFWS comments regarding the referenced scoping request. Please contact me via email with any questions. Thank you for the opportunity to comment.

Respectfully,

Amal Ajmi
Fish & Wildlife Biologist
Planning and Consultation
US Fish & Wildlife Service
101 12th Ave, Room 110
Fairbanks, AK 99701
~~907-456-0324 (Office)~~
907-456-0208 (Fax)
amal_ajmi@fws.gov

"You haven't seen a tree until you've seen it's shadow from the sky". Amelia Earhart

From: [Ajmi, Amal R](#)
To: [Sexton, William J \(DOT\)](#)
Cc: [Henszey, Bob](#)
Subject: RE: [EXTERNAL] Nenana-Totchaket Comment Response
Date: Thursday, January 27, 2022 9:19:53 AM
Attachments: [image001.png](#)

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Morning , thank you for the response. It is most helpful. Yes, I would be very interested in accompanying on a site visit....barring Covid restrictions. Have a great day.

Amal Ajmi
Fish & Wildlife Biologist
Planning and Consultation
US Fish & Wildlife Service
101 12th Ave, Room 110
Fairbanks, AK 99701
~~907-456-0324 (Office)~~
907-456-0208 (Fax)
amal_ajmi@fws.gov

"You haven't seen a tree until you've seen it's shadow from the sky". Amelia Earhart

From: Sexton, William J (DOT) <william.sexton@alaska.gov>
Sent: Thursday, January 27, 2022 08:32
To: Ajmi, Amal R <amal_ajmi@fws.gov>
Subject: [EXTERNAL] Nenana-Totchaket Comment Response

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good Morning Amal,

Thank you for commenting on the ADOT&PF scoping request for the proposed Nenana-Totchaket Road project. We appreciate USFWS's recommendations to mitigate potential impacts to several environmental resources in the project area and will take them into consideration as we advance the project. We would also like to take the time to address some of your concerns by providing additional information about this proposed project.

The purpose and need of the project is to support improved access for agricultural development

planned by DNR as well as increase access for hunting and fishing opportunities. DOT&PF has no plan or intent to further lengthen Totchaket Road beyond the scope of this project. Potentially extending the road to the Kantishna floodplain would allow for its potential use as a material source for construction of the new portion of road, would provide access to DNR's Division of Forestry for future development in the Tanana Valley State Forest, and would further improve access to hunting and fishing opportunities.

ADOT&PF will continue to consult with our federal partners, including the USACE, for impacts to wetlands and waters of the U.S. We will be performing wetland field investigations this Summer 2022 and invite you to accompany our team on a site visit once a date has been established.

Thank you again, your comments bring up some good points that will help us to continue developing our plan for this road project. Let us know if you require any more information and we will keep in touch as we advance the project.

Sincerely,

Bill Sexton

Environmental Impact Analyst II

Alaska DOT&PF

2301 Peger Road / Fairbanks, AK 99709

Office (907)451-2605





United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
Fairbanks Fish and Wildlife Conservation Office
101 12th Avenue, Room 110
Fairbanks, Alaska 99701
January 19, 2022



Brett Nelson/ Northern Region Environmental Manager
Alaska Department of Transportation and Public Facilities
2301 Peger Road
Fairbanks, AK 99709

Re: Nenana-Totchaket Road
NSHWY00657

Dear Mx. Nelson:

The U.S. Fish and Wildlife Service (Service) has reviewed the referenced ADOT&PF scoping request to construct the Nenana-Totchaket Road from the Nenana River to the Kantishna River. Proposed work will include improving approximately 12 miles of existing road and constructing 20 miles of new road. Based on our understanding for the scoping request information, we offer the following comments and recommendations for resources that may be affected by the proposed road.

Background: The Service provided comments on previous proposals for portions of the Nenana-Totchaket Road, including the attached letters to the US Army Corps of Engineers (USACE) on 22 December 1980 (Phase I of the Nenana Agricultural Project), 3 March 1993 (2-920857), 23 May 1994 (M-920857), 16 March 2009 (POA-2009-11) and 22 December 2009 (POA-2009-11-4).

Potentially Affected Fish and Wildlife Trust Resources: The Service's trust resources are natural resources we have been entrusted to protect for the benefit of the American people. Within the proposed project area these resources may include species listed as threatened or endangered under the Endangered Species Act, migratory birds (including eagles), inter-jurisdictional fish, and wetland habitats used by these species.

Threatened and Endangered Species: The purpose of the Endangered Species Act (ESA) is to conserve threatened and endangered species and the ecosystems upon which they depend. Projects that may affect ESA listed species and/ or designated critical habitat must be evaluated under section 7(a)(2) of the ESA to ensure Federal agencies authorizing, funding, and conducting the projects are not likely to jeopardize the continued existence of any listed species, or result in the destruction or adverse modification of designated critical habitat. In this case, no ESA-listed species or designated critical habitat occur within the project area. Therefore, the project would have no effect on listed species or critical habitat, and no further action regarding ESA-listed species is required. This information can be confirmed, and the potential for effects of other projects can be evaluated, at <https://ecos.fws.gov/ipac/>.

Eagles and Their Nests: The Bald and Golden Eagle Protection Act protects eagles from take,¹ including disturbance to their nests, roosts, and foraging sites. The Service maintains an eagle-nest database that provides an indication of past nest activity, which is useful for identifying the presence and suitability of nesting habitat in the project area, but the coverage is limited, and we cannot predict future use. This database does not include any eagle nests near the proposed project area. Ultimately, the applicant is responsible for preventing disturbance to eagles. If an eagle nest is discovered within one mile of the project site, please contact our office for further assistance. For additional guidance, please see our webpages for measures to avoid disturbing eagles,² how to determine the likelihood of disturbing nesting bald eagles,³ and our national eagle management webpage.⁴

Fish and Wildlife Habitat: This project would result in the yet to be determined permanent loss of wetlands and riparian (streamside) habitat. Wetlands provide habitat for a variety of wildlife such as resident and migratory birds (including waterfowl, raptors, shorebirds and songbirds), moose, lynx, marten, mink and other furbearers, and small mammals. Riparian corridors associated with riverbanks in the proposed project area provide essential breeding, rearing and feeding habitat for numerous species of fish and wildlife, since they generally provide more habitat diversity than the adjacent uplands (Magoun and Dean 2000). Some of Alaska's richest bird habitats are in riparian corridors where the combination of water, diverse woody plant growth, high primary productivity, and associated insects and other invertebrates provide an abundant source of food and cover. Other recognized functions of riparian vegetation include stabilizing streambanks and preventing erosion; filtering suspended solids, nutrients, and harmful or toxic substances; providing flood protection in developed areas; and supporting and protecting fish and wildlife species and providing migration corridors (Johnson and Ryba 1992).

In addition to the direct loss of habitat by placing fill in wetlands, the proposed project may also have indirect impacts to wetlands and other associated habitats not included in the project footprint. Increased activity in this relatively undisturbed area can disrupt normal breeding behavior, possibly causing nest failure or reduced productivity (Steidl and Anthony 2000, White and Thurow 1985) in the adjacent wetlands and other habitats. Similarly, large mammals may experience increased energy costs, changes in behavior, decreased fitness, and avoidance of suitable nearby habitat (Boyle and Samson 1985, Taylor and Knight 2003).

Fugitive dust creating dust shadows (area within 328 feet [100 m] of gravel roads and pads) from vehicle traffic over the life of the road could cause long-term impacts to wetlands, adjacent stream and lake fish habitat through alteration of shoreline and aquatic vegetation (Auerbach et al. 1997, Myers-Smith et al. 2006; McGanahan et al. 2017). Even with dust control measures in place some dust deposition would still occur impacting the adjacent vegetation, soil, wetlands, and water resources.

¹ The Bald and Golden Eagle Protection Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb" (16 U.S.C. 668-668c).

² <https://www.fws.gov/alaska/pages/migratory-birds/eagles-other-raptors/eagle-permits/voluntary%20guidance>.

³ <https://www.fws.gov/alaska/pages/migratory-birds/eagles-other-raptors/eagle-permits/disturbance-guidance>.

⁴ <https://www.fws.gov/birds/management/managed-species/eagle-management.php>.

Comments and Recommendations: We offer the following comments and recommendations to help minimize the proposed project's impacts on fish, wildlife, and their habitats.

Migratory Birds: The Service appreciates employing any measures to help avoid disturbing migratory-bird nesting habitat during the nesting season when nests and nestlings are most vulnerable. The most effective Best Management Practice (BMP) to help minimize impacts to nesting birds is to conduct land disturbing activities (e.g., tree and vegetation clearing, excavation, gravel fill, brush hogging, etc.) before or after the breeding season, which is generally May 1 through July 15 at the proposed site.⁵ Some bird species may nest at different times or the habitat may affect nesting dates (e.g., eagles nest two or more months earlier), so we recommend consulting our timing recommendations for your area. Additionally, we appreciate and support employing other conservation measures to minimize impacts to migratory birds. For some example conservation measures to avoid and minimize impacts to birds, please refer to our Migratory Bird Program website.⁶

If gravel will be extracted from sandy or silty sites that could support swallow nests in the cutbanks, or if sand and silt will be stockpiled, the Service recommends making these features unattractive to swallows during or before the next nesting season (generally May 1 through July 15). To discourage bank swallows from building cavity nests in material stockpiles and cutbanks, we recommend avoiding vertical faces by leaving a slope less than 70 degrees on these features (OMNRF 2017). Additionally, removing old, inactive nests before birds return will discourage easy nesting at the same nest site (note: it is prohibited to remove an active migratory bird nest, or an active or inactive eagle nest without a permit; see eagle section).

Floodplain Connectivity: The Service appreciates designing bridges to pass the 100-year flood event and to account for fish passage using natural channel design practices. In addition to considering hydraulics and fish passage, we also recommend the proposed project include provisions for maintaining the floodplain integrity both up and downstream at all floodplain crossings, including culverts (USFWS 2021). Floodplains are an important component of the aquatic ecosystem with many benefits beyond enhancing fish habitat. When considering floodplain connectivity (USFS 2008, Figures 2.5 and 6.30), options for water crossings range from no connectivity (simple high discharge passage) to preserving full functioning of all floodplain processes (full-span crossing). Thus, we recommend constructing stream crossings that preserve floodplain connectivity to the greatest extent possible. We also recommend setting the invert for overflow culverts at the same grade level as the floodplain. These culverts would be in addition to the elevated culverts intended to account for aueis overflow, which would not support floodplain connectivity because they are elevated.

Invasive Species: Invasive species pose a threat to fish, wildlife, and their habitats by outcompeting and extinguishing native species, resulting in monoculture habitats. Unlike most of the country, the Alaska climate and limited access to remote areas previously minimized the potential for introducing and proliferating invasive species in the state. However, these barriers are no longer as effective due to a warming climate and improved access such as the proposed

⁵ <https://www.fws.gov/alaska/pages/nesting-birds-timing-recommendations-avoid-land-disturbance-vegetation-clearing>,

⁶ <https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>.

Nenana-Totchaket Road extension. Special precautions are now needed to ensure protection from invasive species.

The Service recommends implementing Best Management Practices (BMPs) for minimizing the introduction and transport of invasive species into and out of the project area. This is especially important along rivers and streams, which can transport invasive species into more remote areas of the state. Prevention is the most critical aspect of invasive species management, including winter months. BMPs can include thoroughly washing equipment before entering the project area to remove dirt and debris that may harbor invasive plant seeds and propagules, using weed-free fill and certified weed-free erosion control materials, appropriately disposing of spoil and vegetation contaminated with invasive species, and revegetating with local native plant species. BMP's may also include invasive species education for staff and contractors, using weed-free erosion control products, employing management strategies that anticipate and suppress secondary invaders while rapidly restoring native plants to fill the space vacated by invasive species control, and developing a monitoring and treatment plan.

Please refer to <http://aknhp.uaa.alaska.edu/maps/akepic/> for the location of non-native invasive species within the project area, with the understanding that lack of information does not equate to the potential absence of invasives at the location. To enhance on-the-ground knowledge of invasive species management, we recommend project contractors review a free self-paced training course on invasive species control, which can be found at <http://weedcontrol.open.uaf.edu/>. Additional BMPs can be found at the UAF Cooperative Extension Service by searching for "invasive" at <http://cespubs.uaf.edu/publications>.

Fugitive Dust: Some dust palliatives include chemical suppressants. Use of these chemicals, often containing chloride, introduce toxins, like heavy metals, into the environment which can persist in the soil for many decades (Neitlich et al. 2017). To minimize additional impacts from dust suppressant chemicals, the Service recommends using water alone when practicable, and avoiding dust suppressants with ingredients potentially harmful to aquatic organisms within 328 feet (100 meters) of any fish-bearing stream and higher-value wetlands (e.g., emergent wetlands, fens, and shallow ponds) to minimize potentially degrading these important fish and wildlife habitats.

Sediment and Erosion Control Products: We recommend avoiding the use of sediment and erosion control materials that contain plastic. Prior to degradation plastic materials, especially mesh netting found in erosion control mats, can entangle wildlife, including amphibians, birds, small mammals, and fish. These materials also contribute to plastic debris pollution ranging from large sections of dislodged netting to small bits of plastic fragments entering the environment and posing secondary hazards to fish and wildlife. Therefore, we recommend using temporary erosion and sediment control products that either do not contain netting, or that contain netting manufactured from 100% biodegradable non-plastic materials such as jute, sisal, or coir fiber. Degradable, photodegradable, UV-degradable, oxo-degradable, or oxo-biodegradable plastic netting (including polypropylene, nylon, polyethylene, polyester, poly-jute, etc.) are not acceptable alternatives as all these materials contain plastics.

If netting is used, it should have a loose-weave, wildlife-safe design with movable joints between the horizontal and vertical twines, allowing the twines to move independently and thus reducing

the potential for wildlife entanglement. Additionally, we recommend avoiding the use of silt fences reinforced with metal or plastic mesh, which can also cause an entanglement hazard to wildlife. Finally, to further minimize hazards to fish and wildlife, temporary erosion and sediment control products, when no longer required, should be promptly removed before its removal becomes too difficult, potentially damaging new vegetation. For more information, please refer to https://documents.coastal.ca.gov/assets/water-quality/permits/Wildlife-Friendly_Netting_in_Erosion_&_Sediment_Control-Factsheet_r5_Sept_2016.pdf.

New Right of Way (ROW) Alternatives: The western-most 3 to 4.5 miles would require acquiring a new ROW. Alternative 2 would require fewer miles of habitat disturbance (3 miles) and appears to avoid more of the Kantishna River floodplain than the straight-line Alternative 1. If habitat disturbance and floodplain avoidance (not simply ordinary high water) were the only considerations, the Service would recommend Alternative 2. However, given the Totchaket Road keeps getting longer, we recommend also considering an alternative with the best location for a potential Kantishna River crossing with minimal disturbance to the western side of the Kantishna River floodplain. A third alternative, such as terminating the road about 1 mile downriver from Alternative 2 might address these considerations by avoiding a Kantishna River side channel west of the main channel.

Comprehensive Environmental Review: The purpose and destination of the Totchaket Road has fluctuated for over 40 years, including access to a proposed landfill, agricultural development, oil and gas prospects, and possibly a road to McGrath (e.g., attached comment letters). While these are noteworthy endeavors, piecemealing an improved access road into undeveloped fish and wildlife habitat by first constructing a portion of the road without an access bridge, followed later by a bridge, and now proposing to extend the road into undeveloped areas overlooks a proper environmental review. By constructing the road entirely with State funds does not negate the need for a comprehensive environmental review by federal permitting agencies (e.g., a Clean Water Act permit for wetlands). A new road into an undeveloped region of Alaska, such as the Totchaket Road, should include a comprehensive environmental review, and we encourage ADOT&PF to consult with its federal permitting agencies to conduct a formal Environmental Impact Statement for the public's review.

Conclusion: We appreciate this opportunity for early comment. Our comments are based on the information provided in this public notice. Should the project plans change, we would appreciate an opportunity to review the changes. Please contact Amal Ajmi at 907-456-0324 (amal_ajmi@fws.gov) should you have any questions concerning these comments.

Sincerely,

Bob Henszey
Branch Chief
Conservation Planning Assistance

Attachments:

22 December 1980 Letter to Alaska Transportation Consultants, Inc.
 3 March 1993 Letter to USACE
 23 May 1994 Letter to USACE
 16 March 2009 Letter to USACE
 22 December 2009 Letter to USACE

ecc: Bill Sexton, ADOT&PF, Fairbanks
 Joshua Verhagen, Nenana Mayor
 Dianna Leinberger, DNR, Fairbanks
 Ellen Lyons, USACE, Fairbanks
 Audra Brase, ADF&G-Division of Habitat, Fairbanks
 Matt LaCroix, EPA, Anchorage

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