

MATANUSKA-SUSITNA BOROUGH Fish & Wildlife Commission

350 E Dahlia Ave., Palmer, Alaska 99645

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Andy Couch

VICE CHAIR

Peter Probasco

MSB STAFF

Maija DiSalvo



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Howard Delo

Larry Engel

Tim Hale

Gabe Kitter

Bill Gamble

Kendra Zamzow

Ex officio: Jim Sykes

Special Meeting

August 22, 2024

Meeting Packet - Table of Contents

Pg. = Item:

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Physical Location of Meeting: Assembly Chambers, DSJ Bldg, 350 E. Dahlia Ave., Palmer

Remote Participation: See attached agenda on p. 1

Planning and Land Use Department - Planning Division

<http://www.matsugov.us> • planning@matsugov.us

MATANUSKA-SUSITNA BOROUGH
MSB Fish and Wildlife Commission
AGENDA

Edna Devries, Mayor

Andy Couch – Chair
Peter Probasco – Vice Chair
Gabriel Kitter
Howard Delo
Larry Engel
Tim Hale
Bill Gamble
Kendra Zamzow
Jim Sykes – Ex officio member

Maija DiSalvo – Staff



Michael Brown, Borough Manager

PLANNING & LAND USE DEPARTMENT
Alex Strawn, Planning & Land Use Director
Vacant, Planning Services Manager
Jason Ortiz, Development Services Manager
Fred Wagner, Platting Officer

*Assembly Chambers
Dorothy Swanda Jones Building
350 E. Dahlia Avenue, Palmer*

August 22, 2024
SPECIAL MEETING
5:00 p.m.

Ways to participate in MSB Fish and Wildlife Commission meetings:

IN-PERSON: Back of Assembly Chambers, DSJ Building

REMOTE PARTICIPATION VIA MICROSOFT TEAMS:

Join on your computer:

[Click here to join the meeting](#)

Meeting ID: 250 683 024 408

Passcode: DV8YS6

Or call in (audio only):

1-907-290-7880

Phone Conference ID: 228 548 69#

I. CALL TO ORDER

II. ROLL CALL – DETERMINATION OF QUORUM

III. LAND ACKNOWLEDGEMENT

"We acknowledge that we are meeting on traditional lands of the Dena'ina and Ahtna Dene people, and we are grateful for their continued stewardship of the land, fish, and wildlife throughout time immemorial."

IV. PLEDGE OF ALLEGIANCE

V. APPROVAL OF AGENDA

VI. AUDIENCE PARTICIPATION (*three minutes per person*)

VII. STAFF/AGENCY REPORTS & PRESENTATIONS

- A. Staff Report
- B. Chair's Report

VIII. UNFINISHED BUSINESS

IX. NEW BUSINESS

- A. West Susitna Access Road Public Comment

X. MEMBER COMMENTS

XI. NEXT MEETING DATE: Thursday, August 29, 2024 – 5:00 pm Assembly Chambers

XII. ADJOURNMENT

Disabled persons needing reasonable accommodation in order to participate at a MSB Fish and Wildlife Commission Meeting should contact the Borough ADA Coordinator at 861-8432 at least one week in advance of the meeting.

Draft Brief Statement of Purpose & Need

Background

The purpose of this memo is to document a brief statement of Purpose and Need for the West Susitna Access (WSA) Road Project (Project) consistent with Federal Highway Administration (FHWA) methodologies and standard transportation project practices. The “purpose” states why the Project is being proposed and states the intended positive results. The “need” describes the key problems the Project aims to address and explains the underlying causes of those problems. This memo is intended as a starting point for soliciting public and agency comments during scoping. The draft National Environmental Policy Act (NEPA) document will flesh out and refine the purpose and need based on public and agency comments.

Purpose and Need

Purpose

The purpose of the Project is to provide a safe public road linkage from the existing highway system west to public lands owned by the State and Matanuska Susitna Borough (MSB). This improved access would allow for increased recreation, guiding and settlement opportunities and economic development of State and Borough resources including forestry, agriculture, minerals, and energy.

Need

The Project is driven by a lack of developed overland road access to state lands selected and planned for recreation, settlement, and economic/resource development. The state and local governments selected lands in the Project Study Area, and their adopted management plans have identified and planned for development of these opportunities. Absence of road access is a constraint to full utilization of these lands for their selected and planned purposes. Access and development of these lands is consistent with Article VIII, Section 5 of Alaska's Constitution which supports the development of infrastructure facilities and improvements to assure greater utilization, development, reclamation, and settlement of lands, and to assure fuller utilization and development of fisheries, wildlife, and waters. In furtherance of the Constitutional authorization, the Legislature created a DOT&PF purpose, in AS 19.05.125, to provide “a network of highways linking together cities and communities throughout the state (thereby contributing to the development of commerce and industry in the state, and aiding the extraction and utilization of its resources), and otherwise improve the economic and general welfare of the people of the state.” Similarly, Congress

recognized Alaska's underdeveloped road system and created an Alaska-specific authorization, in 23 USC 118(d), that federal-aid funds "may be expended for construction of access and development roads that will serve resource development, recreational, residential, commercial, industrial, or like purposes."

This Project seeks to realize these constitutional and statutory aspirations by improving access and encouraging the responsible use of these lands.

Need 1: Lack of overland public road access limits the use and enjoyment of lands selected and planned for recreation, including tourism, and settlement.

- **Recreation.** Currently the lack of public road access to this area limits the ability for the public to hunt, fish, hike and recreate in areas that were selected and planned by the State and Borough for these activities. Without improved access and associated recreational facilities, the ability for residents and visitors to use the land recreationally is cost prohibitive and difficult. Only the most experienced and seasoned remote travelers are able to safely access these remote locations. The challenges and expense of getting to these lands limits the ability of the general population to enjoy and recreate in the area.
- **Settlement.** Settlement is a planned use of selected areas as identified in approved Department of Natural Resources (DNR) area and management plans. Currently, state and borough lands selected for settlement, including existing platted subdivisions, which are only accessible by air or river travel or overland during winter months. Crossing the Susitna River is a major constraint to access. The challenges and expense of getting to the lands identified for settlement are constraints to those lands being settled and used as planned.

Need 2: Economic development of resources (forestry, minerals, agriculture, and energy) is constrained by the lack of overland road access.

Resource studies and management plans in the area indicate the presence of marketable timber, minerals, agricultural lands, and several energy sources, including renewables (reference list). A lack of road access west of the Susitna River and connecting to the current road network inhibits economic and resource development. The lack of access, especially across the Susitna River, creates a barrier to the development of natural resources in the Susitna Basin for in-state use and export. Currently, transportation to this resource-rich area is cost prohibitive and lacks efficient safe connectivity to major labor markets of MSB and Anchorage as well as to transportation networks and services that would make resource development economical.

References

Alaska Department of Natural Resources (ADNR)

2008 Southeast Susitna Area Plan for State Lands. Division of Mining, Land and Water Resource Assessment & Development Section. April 2008.

2011 Susitna Matanuska Area Plan for State Lands. Division of Mining, Land and Water Resource Assessment & Development Section. August 2011.

2024 Frontier Basins and Rural Energy. Accessed at <https://dggg.alaska.gov/energy/frontier-basins.html> on July 11, 2024.

Alaska Industrial Development and Export Authority

2023 Press Release West Susitna Access Project Update. AIDEA Office of Communications & External Affairs. July 28, 2023.

Alaska Renewables

2024 Phase 1 Projects. Accessed at <https://www.alaskarenewables.com/projects> on July 11, 2024.

DOT&PF (Alaska Department of Transportation and Public Facilities)

2014 West Susitna Access Reconnaissance Study – West Susitna Access to Resource Development, Transportation Analysis Report. January 2014.

HDR (HDR Engineering Inc.)

2023 West Susitna Access Project Conceptual Alternatives Identification Report. Prepared for AIDEA. May 2023. Anchorage, AK.

Matanuska Susitna Borough

2001 Parks, Recreation, and Open Space Component of the Asset Management Plan. Department of Community Development. Land Design North. June 2021.

Background

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1. Introduction

The purpose of this memo is to describe and present the West Susitna Access (WSA) Road Project (Project) background and history that supports the purpose and need, logical termini, and proposed action.

2. Who is proposing the Project?

The Alaska Department of Transportation and Public Facilities (DOT&PF) proposes to construct the Project as a new, rural public road to facilitate public access to State of Alaska and Matanuska Susitna Borough (MSB) lands in the Susitna basin. DOT&PF is advancing this Project consistent with state policy laid out in the constitution and statutes which encourages the development of public roads to assure greater utilization, development, and settlement of lands and improving the economic and general welfare of Alaskans.

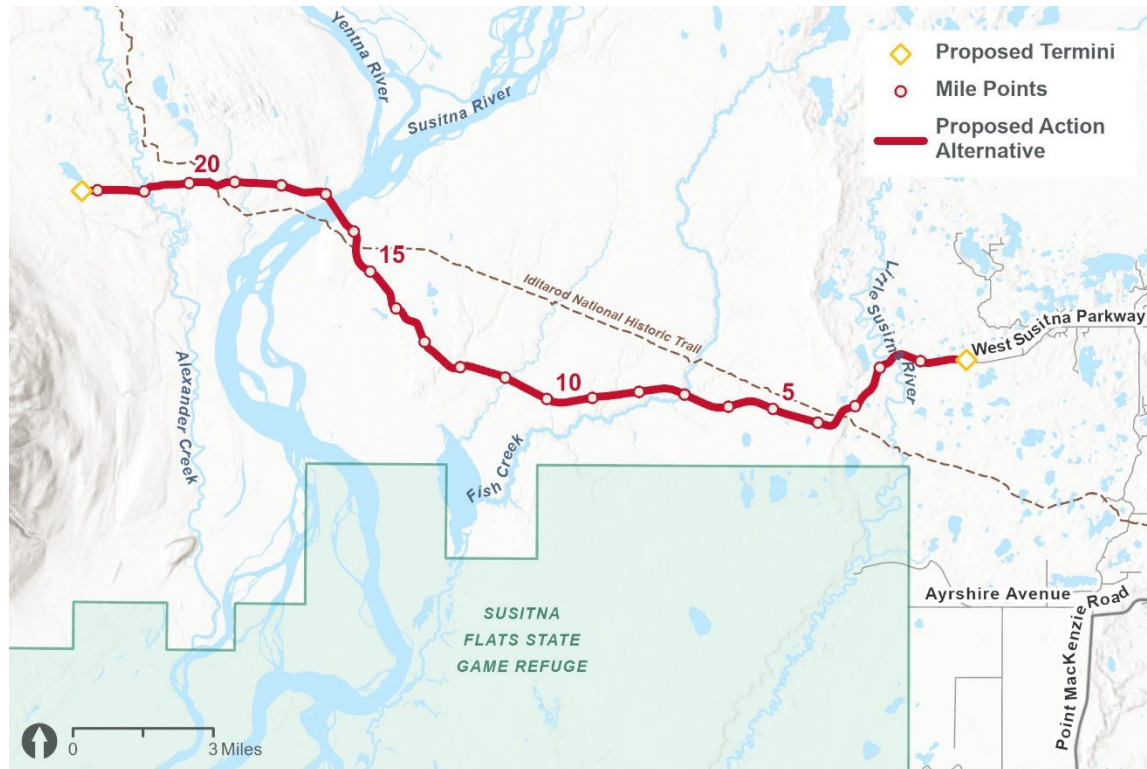
3. Where is the Project located?

The Project is in Southcentral Alaska, generally west of the Parks Highway, south of Denali National Park and Preserve, east of the Alaska Range, and north of Cook Inlet (including the Beluga/Tyonek area). Surface road access west of the Parks Highway to most of this area is minimal or non-existent, and most of the Study Area is not accessible from the existing road network. Currently, access within the Study Area

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occurs primarily via air, river, or by snowmachine or ice roads during the winter months. Other modes of travel include skiing, dogsled, and on foot.

Figure 1. West Susitna Project Area



4. Where did this Project come from?

Improving road access to this Study Area has been an idea studied for decades. In the last 10 years, the idea has advanced with engineering and environmental analysis moving the Project forward. In 2014, DOT&PF conducted the West Susitna Surface Access Reconnaissance Study (WSA Recon Study (DOT&PF 2014))¹. The purpose of the WSA Recon Study was to evaluate and consider the need for surface access to recreation and resource development opportunities west of the Susitna River. To achieve that study's purpose, DOT&PF laid out the following objectives in the WSA Recon Study:

- Identify resource development opportunities west of the Susitna River
- Identify one or more potential crossings of the Susitna River
- Identify one or more potential transportation corridors to access identified resources

¹ The 2014 West Susitna Surface Access Reconnaissance Study is available here: [West Susitna Access Reconnaissance Study, Transportation Analysis Report with Appendix \(alaska.gov\)](http://alaska.gov)

The WSA Recon Study combined literature reviews and interviews from land managers and resource developers on natural resource opportunities, infrastructure needs, and historical access routes to the West Susitna drainage. The first part of the study consisted of inventorying natural resources and existing infrastructure in the area. Based on these factors, resource opportunities, environmental constraints, feasible Susitna River crossing locations, and potential road corridors were identified (DOT&PF 2014; HDR 2023).

5. Why is DOT&PF Proposing to Improve Access to this Study Area?

This section provides a brief overview of the types of resources on State lands that would benefit from improved road access provided by this Project.

Mineral Resources

The Project Study Area and surrounding lands are known to contain mineral resources that have been explored to varying degrees for extensive time periods. There are active mining claims near the Project Study Area and placer gold was found in the Susitna basin in the early 1900s. Other commodities in the area include copper, silver, molybdenum, iron, platinum group elements (PGE), coal, and possibly diamonds. According to the Alaska Department of Natural Resources (DNR) Susitna Matanuska Area Plan (2011) (SMAP), the entire Mount Susitna region is open to coal exploration and development. The SMAP states:

Large areas of the region have low to moderate coal potential but only minimal locatable or leasable mineral potential. The entire area is open to coal exploration and development, under coal leasing standards, and to mineral leasing under mineral leasing standards.

Oil and Gas Resources

Active oil and gas exploration continues to occur in northern Cook Inlet. According to DNR, recent drilling has proven new reserves in existing fields. Cook Inlet oil production peaked at 230,000 barrels-per-day (bpd) in 1970, dropping to about 10,800 bpd in fiscal year (FY) 2012. According to the SMAP, “there is potential for oil and gas development in the Mount Susitna region with most of the area being available for oil and gas leasing and all areas are available for oil and gas leasing, although certain stipulations are placed on such development within the state recreation river.” DNR’s Division of Geological & Geophysical Surveys (DGGS) has identified the Susitna basin as having the potential for significant gas reserves (DNR-DGGS 2024).

In the vicinity of the project area, multiple alternative energy resource projects have been studied. The proposed Little Mount Susitna Wind Project by Alaska Renewables (2024) is the most proximal alternative energy project to the subject project, located approximately 10 miles southwest of the western terminus of the road. The Little Mount Susitna Wind Project is not related to the subject Project; the proposed wind project plans indicate that 33–35 miles of new access roads would connect to existing industrial gas field roads to the south of the wind project location only. In addition, woody biomass on the Susitna River Corridor has also been identified as a potential alternative energy source (DOT&PF 2014).

Recreation Resources

Recreation is a popular use of State lands in Alaska. Much of the land within proximity to the Project Study Area is State land, and much of that is managed for recreation. Large acreages of undeveloped lands contribute to vast recreational opportunities. The area is well endowed with recreational resources opportunities, from its low-lying areas consisting of fish-filled lakes and rivers to the foothills and mountains of the Alaska Mountain Range. The area is bounded by federally managed recreational lands to the north and southwest: Denali National Park and Preserve and Lake Clark National Park and Preserve, respectively.

A sampling of recreational resource opportunities and experiences in the area includes:

- Remote, backcountry recreation
- State-designated recreational areas and rivers
- Private lands and remote cabins
- Consumptive uses, such as sportfishing, hunting, and firewood harvesting
- Wildlife viewing
- Winter recreation
- Tourism, such as lodges and sportfishing

The SMAP identifies areas (Unit M-12) that encompass Mount Susitna, Little Mount Susitna, and Beluga Mountain that are managed for recreation purposes near the western terminus of the Project. The SMAP explains that there is comparatively little use of this region by the public, again reflecting its remoteness and difficulty of access. Recreational/seasonal settlement has taken place around several of the lakes and streams as a result of past state land disposals. The closest boundary of Unit M-12 is Mount Susitna which is approximately 3 miles to the southwest. The Matanuska Susitna Borough (MSB) 2001 Parks, Recreation & Open Space Plan identifies the Susitna River Recreational Corridor and the Lower Susitna – Yenta public use area as key recreational corridors and open spaces in the MSB (MSB 2001).

The State of Alaska owns nearly 2 million acres of identified timberlands in the Matanuska-Susitna valley, some of which are located within proximity of the Project Study Area. The SMAP which covers a portion of the Project Study Area, addresses forest resources in the Susitna Matanuska area in the Mount Susitna region as follows:

Extensive forestry resources occur throughout the region (approximately 219,000 acres). Generally, these areas occur in the central lowlands and are characterized by deciduous forest, evergreen forest, or mixed forest, depending on soils and hydrology. These lands are primarily situated west of Alexander Creek and south of the Skwentna River in areas of better drained soils in the central lowlands. Although these resources are not expected to be harvested for large scale commercial purposes during the planning period owing to the lack of road/bridge access, some limited areas may be harvested using winter roads. The extent and distribution of this resource is such that it warrants designation as Forestry and, possibly, protection and management through the creation of a state forest.

The SMAP identifies units M-07 and U-24 as managed for forestry; both of these units are approximately 13 miles north of the proposed Project road's western terminus. Along the Project's route east of the Susitna River, the SMAP identifies several management units which include forestry as either a primary or secondary management designation. Also, the DNR's 2008 Southeast Susitna Area Plan (SSAP) identifies unit S-03 as primarily managed for forestry, which occurs along the road alignment.

The SSAP indicates that moderate agriculture resources exist within the region but that development is likely to be limited during the planning period owing to the relatively scattered distribution of the tracts, their remote location, and the lack of road accessibility.

6. What alternatives have been studied and how was the proposed action identified?

To identify the proposed action, DOT&PF employed a two-step alternative identification and screening process; first evaluating broad corridors in the Sustina region in the 2014 WSA Recon Study to identify a preferred corridor, and second, refining and evaluating different alternatives for routing at the project's east end to connect to that corridor.

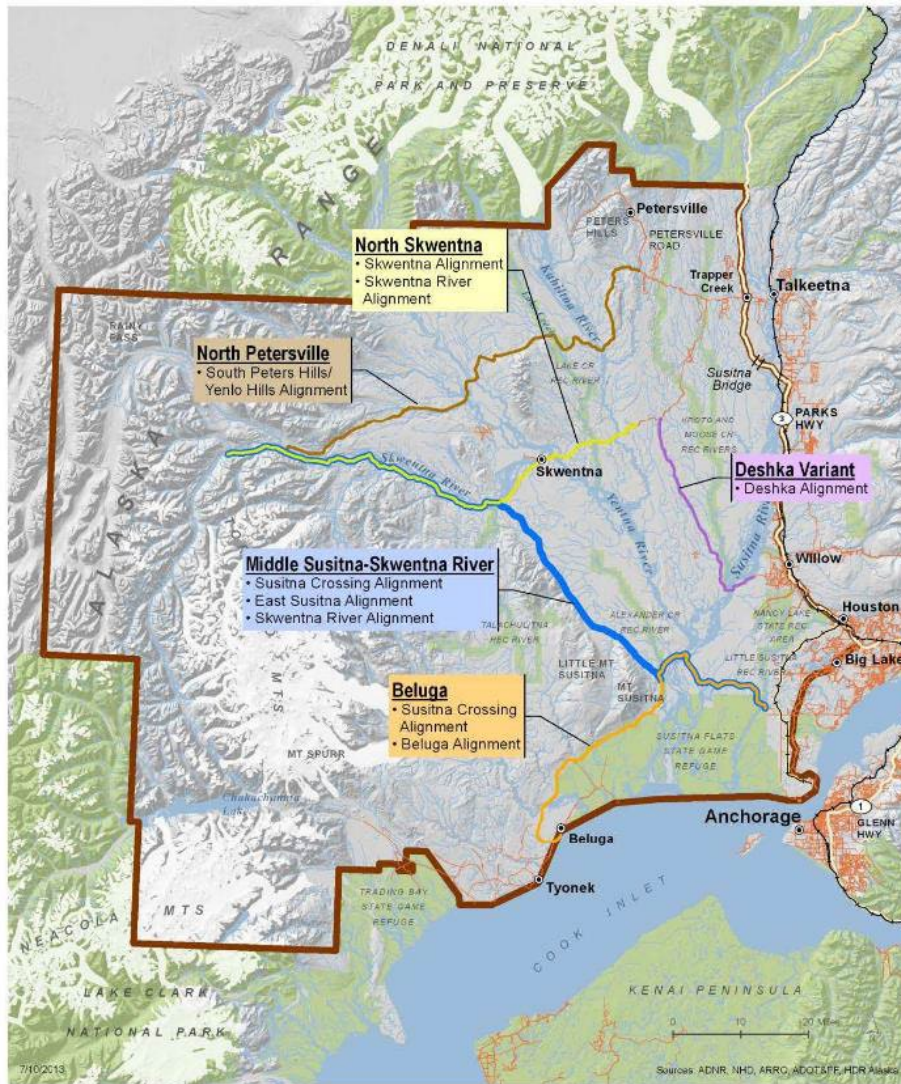
2014 Corridor Analysis. The corridor for the current project was determined based on DOT&PF's 2014 WSA Recon Study. In the 2014 work, DOT&PF identified

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environmental opportunities and constraints for the location of potential access roads in a broad area of the Susitna Basin. The constraints identification helped to determine where placement of a road should be avoided from an engineering or permitting perspective. Constraints included factors such as topography, rivers, wetlands, and other features such as non-state lands (e.g., private lands). Broad corridors were identified based on the location of natural resources, constraints, and opportunities. The WSA Recon Study evaluated the following corridor alternatives. See Figure 2 for the location of the evaluated corridors and the 2014 study for details.

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Figure 2. DOT&PF 2014 Evaluated Corridors



Proposed Access Routes

West Susitna Access to Resource Development



Table 1, is repeated from the original 2014 analysis and summarizes the finding for the original screening.

Table 1. Corridor Routes Summary

	North Petersville Road	North Skwentna	Middle Susitna-Skwentna River	Beluga	Deshka Variant
General origin	Petersville Rd	Oil Well Rd	Little Su River Rd	Little Su River Rd	Willow area
General destination	Upper Skwentna mineralized area	Upper Skwentna mineralized area	Upper Skwentna mineralized area	Beluga/ Tyonek	Oil Well Rd
Amount of resources accessed					
Hardrock minerals	Medium	High	Highest	Lowest	Low
Placer gold mining	Medium	High	Highest	Lowest	Lowest
Coal	Medium	Medium	High	Highest	Lowest
Oil and gas	Lowest	Medium	Medium	High	Highest
Forestry/timber	Low	High	Highest	Low	Medium
Agriculture	Lowest	Lowest	Medium	Lowest	Highest
Recreation	Low	Lowest	Medium	Highest	Low
Length (miles)	78.8	71.6	107.9	63.8	33.5
New Bridges (#)					
Conventional ¹	9	12	20	11	1
Long Span ²	4	6	4	2	2
Total	13	18	24	13	3
New bridge crossings greater than 1,000 feet	1,150 (Yentna)	1,200 (Yentna) 1,200 (Hayes)	1,200 (Hayes) 1,640 (Susitna)	1,640 (Susitna)	1,200 (Susitna)
New Culverts (#)					
Large ³	12	12	14	6	2
Small ⁴	37	26	40	12	11
Minor Drainage ⁵	316	292	440	260	136
Cost Estimate (millions)					
Subtotal ⁶	\$147.6	\$188.3	\$187.4	\$106.9	\$72.2
Total ⁷	\$376.4	\$504.3	\$453.2	\$257.8	\$216.9
Total per mile ⁸	\$4.6	\$6.3	\$4.2	\$4.0	\$5.2

¹ A *Goeller scorecard* is a commonly used method of comparatively displaying pros and cons. The Goeller scorecard was used in this reconnaissance study to display the impacts of the reconnaissance-level proposed access routes. This method displays the impacts of each option, which is expressed in its 'natural' units. In this study, examples of natural units are feet, miles, number of creek crossings, acreages, and monetary value. In the tables, each row represents one impact and each column represents an access route option. Colored shading is used to comparatively indicate the more or less favorable metrics. The color shading was intended to make it easier for a decision-maker or reader to identify patterns or to come to conclusions. In some cases, values were relatively similar so there may be more than one option shaded the same color within the same row. No behind-the-scenes normalization or ranking was applied.

Green = Proposed access route(s) with the fewest number of roadway miles, bridges, culverts, and/or costs. Also, indicates highest amount of resources made accessible.

Red = Proposed access route(s) with the greatest number of roadway miles, bridges, culverts, and/or costs. Also, indicates least amount of resources made accessible.

Assumptions:

- ¹ Conventional bridges are considered less than 300 feet in length.
- ² Long span bridges are 300 feet or longer.
- ³ A culvert approximately 96 feet or longer.
- ⁴ Small culverts and minor drainage culverts have an assumed length of approximately 50 feet.
- ⁵ An additional four culverts per mile to accommodate minor drainage patterns.
- ⁶ Subtotal cost estimate for new proposed access roadways includes clearing, earthwork, structures, stream and river crossings (including culverts), guardrail and retaining walls, and miscellaneous items such as topsoil, seeding, geotextile and signing.
- ⁷ Total cost estimate includes drainage measures, erosion and pollution, surveying, environmental studies and permits, existing road upgrades, construction, mobilization, right-of-way (ROW) acquisition, contingency, design, and utilities.
- ⁸ Total per mile includes only the proposed access routes and does not include existing roadways or cost to upgrade them.

Based on the analysis from the WSA Recon Study, the Middle Susitna-Skwentna River Corridor provided the greatest opportunities with the lowest technical constraints, summarized as follows:

- Highest for access to hardrock minerals
- Highest for access to placer gold mining
- High access to coal
- Highest access to forestry/timber resources
- Highest opportunity for access to State lands with low impact to private lands
- Good geological conditions
- Technically feasible
- Among the lowest costs per mile

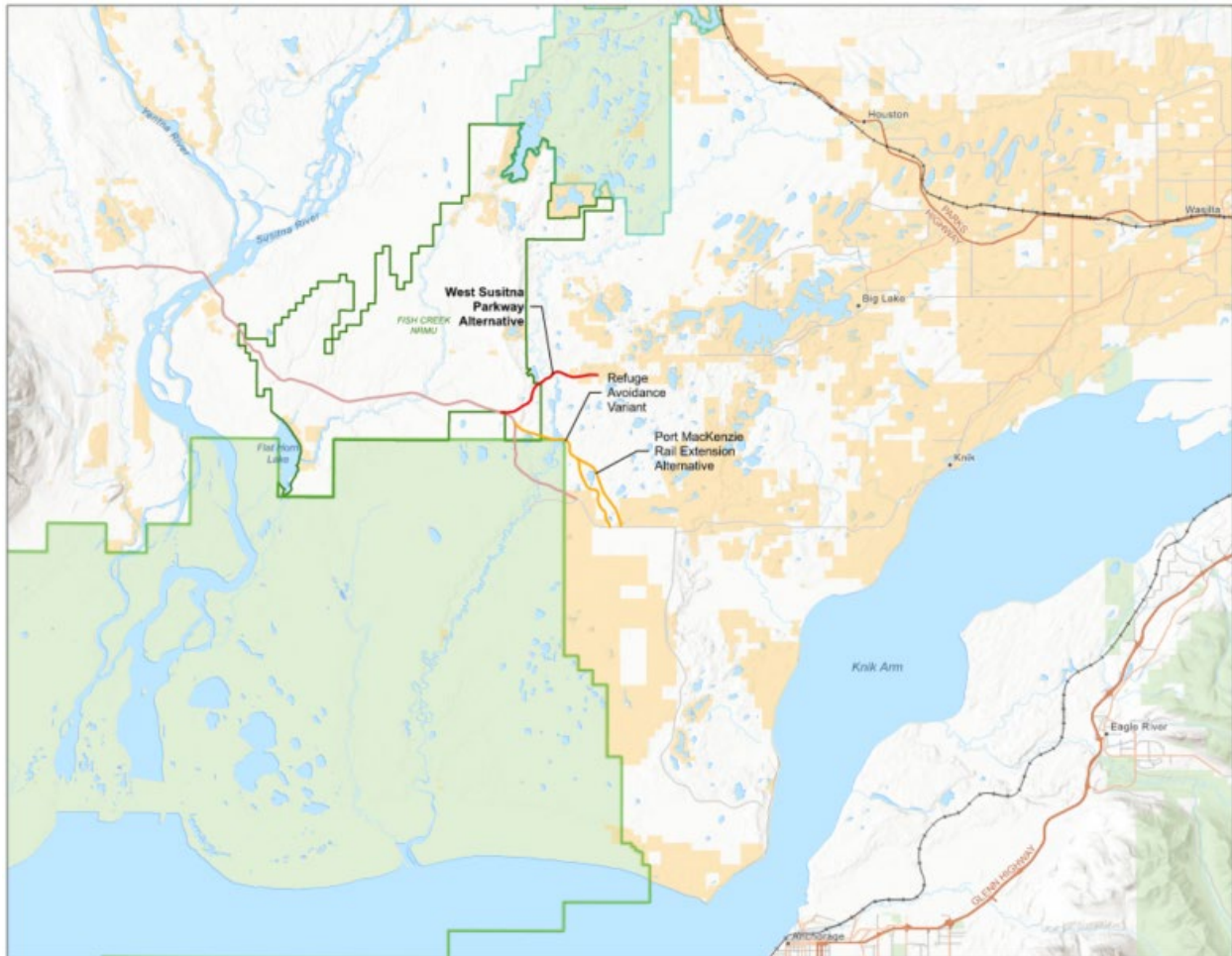
One critical route determining factor was the technical feasibility of crossing the Susitna River. There are very few locations where the Susitna River can be reasonably crossed, based on a number of factors including river stability, required crossing length, and approach topography. Importantly, this route utilizes the only technically feasible crossing area of the Susitna River. The recommended crossing location is in the vicinity of Susitna Landing, which is located on a straight reach of river with one of the few bedrock controls on the entire lower river; the riverbanks are stable; and the water velocity is low due to the low gradient of the river.

DOT&PF's proposed action would build approximately 23 miles of road, generally following the corridor Middle Susitna-Skwentna River recommended in the 2014 WSA Recon Study.

East End Connection Alternatives. To identify the proposed action, the Project team collected and reviewed previous work completed by DOT&PF and other agencies to evaluate connections at the east end of the corridor. The Project team evaluated the previous work, provided a description of each previously studied alignment along with

the pros and cons of those alignments (See Table 2). Figure 3 depicts the range of east end connection alternatives studied.

Figure 3. East End Connection Alternatives



The matrix below summarizes the screening criteria used to assess the least environmentally damaging practicable alternative (LEDPA) and therefore the proposed action. Practicability of alternatives considers schedule as a critical factor, hence including references to private property, etc.

Table 2. East End Connection Alternatives Screening Matrix

	Point MacKenzie Route	Point MacKenzie Rail Alternative	Refuge Avoidance Alternative	West Susitna Parkway Alternative
Section 4(f)	Crosses northeast corner of Susitna Flats State Game Refuge	Avoids Susitna Flats State Game Refuge	Avoids Susitna Flats State Game Refuge	Avoids Susitna Flats State Game Refuge
Private Property	Crosses Private Property	Crosses Private Property	Crosses Private Property	Avoids Private Property
Route Length	22.7 miles	24.4 miles	24.4 miles	22.4 miles
Technical Feasibility of Bridge Crossings	Utilizes best crossing area of Susitna River	Utilizes best crossing area of Susitna River	Utilizes best crossing area of Susitna River	Utilizes best crossing area of Susitna River
Minimizes River & Creek Crossings	4 bridges (estimated)	4 bridges (estimated)	4 bridges (estimated)	4 bridges (estimated)
Accesses 6 million acres of state lands	Yes	Yes	Yes	Yes
Access to Population Centers	Yes, under 25 miles	Yes, under 25 miles	Yes, under 25 miles	Yes, under 25 miles
Federal repayment Issues	No	Using the rail embankment likely requires repayment of federal funds and/or a functional replacement, as it would preclude future rail use.	No	No
Leverage Existing Right-of-Way	Yes (for majority)	Not on eastern end	Not on eastern end	Yes (on east end)

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The West Susitna Parkway Alternative would avoid both the Susitna Flats State Game Refuge and privately owned property. Because it is the shortest alternative, its costs are anticipated to be lower. The banks of the Little Susitna River at the proposed crossing location were specifically chosen as they provide an appropriate location for a bridge crossing.

The proposed action provides unique recreational opportunities as it would grant new access to the region. As the West Susitna Parkway Alternative is north of the other DOT&PF alternatives, it provides a more upstream entry point to Little Susitna River. This allows recreational users who float the Little Susitna River access to state-owned public facilities within the Little Susitna River Management Unit that otherwise may be difficult to access. This will also allow for easier access to fishing opportunities along the Little Susitna River. On the east side, the proposed action will cross two surface easements (ADL 57588 and 222930), one RS2477 Trail (RST 118 Knik Susitna Trail) both intended to serialize the same route as the Iditarod National Historic Trail, and will have one crossing over it, for a total of three.

7. References

DOT&PF (Alaska Department of Transportation and Public Facilities)

2014 West Susitna Access Reconnaissance Study – West Susitna Access to Resource Development, Transportation Analysis Report. January 2014.

HDR (HDR Engineering Inc.)

2023 West Susitna Access Project Conceptual Alternatives Identification Report. Prepared for AIDEA. May 2023. Anchorage, AK.

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Matanuska Susitna Borough

2001 Parks, Recreation, and Open Space Component of the Asset Management Plan. Department of Community Development. Land Design North. June 2021.

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Draft Statement of Logical Termini

Background

The West Susitna Access Road project (Project) is a new, rural public road facilitating public access to State of Alaska and Matanuska Susitna Borough (MSB) lands in the Susitna River basin. The Project aims to build a new public road that extends from the existing highway system to state lands west of the Susitna River, ending near state and MSB subdivisions. The project will facilitate access to the Little Susitna River, Fish Creek, the Susitna River, and Alexander Creek (Figure 1). This memorandum (memo) describes the subject Project in terms of the Federal Highway Administration (FHWA) regulations and guidance for logical termini, independent utility, and consideration of alternatives.

Regulatory Context

Per FHWA regulations at 23 Code of Federal Regulations (CFR) 771.111(f),

any action evaluated under NEPA [National Environmental Policy Act] as a categorical exclusion (CE), environmental assessment (EA), or environmental impact statement (EIS) must:

- (1) Connect logical termini and be of sufficient length to address environmental matters on a broad scope;*
- (2) Have independent utility or independent significance, i.e., be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made; and*
- (3) Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.*

FHWA guidance further defines “logical termini” as “(1) rational end points for a transportation improvement, and (2) rational end points for a review of the environmental impacts.” (USDOT 2024).

Figure 1. Project overview



Logical Termini Analysis (23 CFR 771.111(f)(1))

East End Terminus

The eastern end of the project would connect to the existing roadway system. The proposed action would extend from the western end of West Susitna Parkway, at the southwestern corner of the Big Lake community (Figure 2). West Susitna Parkway is classified as a local road at its western end and a minor collector at its eastern end where it connects to Big Lake Road, a minor arterial.

West End Terminus

The western end of the project is located near Milepost 23, approximately 1.5 miles west from the proposed bridge over Alexander Creek (Figure 3). This location provides access to Alaska Department of Natural Resources-managed lands designated for settlement and other uses consistent with the state constitution and land management plans in accordance with the purpose and need for the project. Specifically, the west end terminus at this location would provide access to state-managed lands designated for settlement in the *Susitna Matanuska Area Plan* (SMAP) (SMAP Units M-18, M-19, U-25; DNR 2011) and

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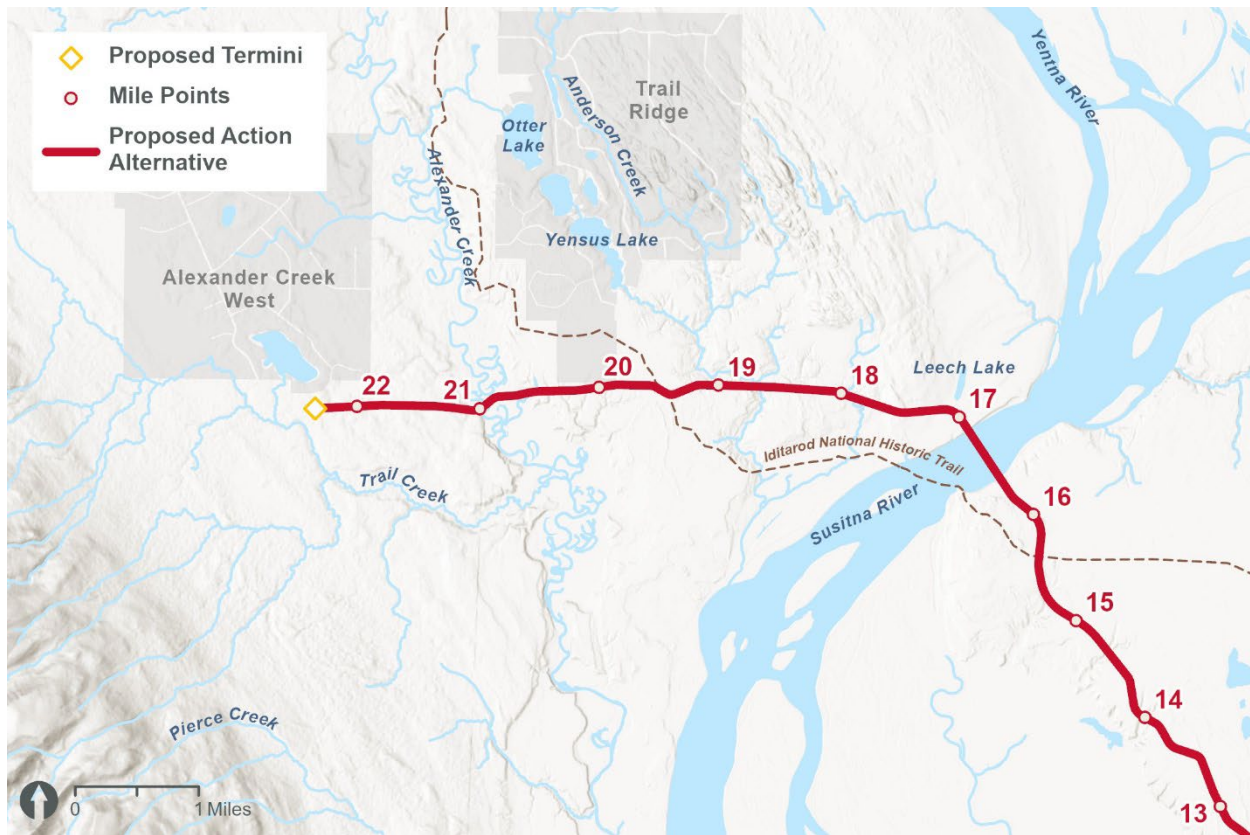
would allow access to the existing subdivisions (Alexander Creek West Alaska State Land Survey [ASLS] 79-209, Trail Ridge - ASLS 81-177, and Otter Lakes – ASLS 19-147).

This terminus would also allow access to nearby state lands designated for forestry (SMAP Unit M-07), recreation (SMAP Unit M-12), and settlement (SMAP Unit M -17). This terminus would provide access to adjacent public recreational lands designated in the SMAP, and the Susitna Basin Recreation Rivers Management Plan (SBRMP) including access to sport hunting and fishing, subsistence, and public recreation (especially skiing and hiking) activities along the corridor. The proposed material site near Milepost 23 would be an efficient turnaround point for construction vehicles and other traffic, as well as provide materials for road construction. Therefore, the Project terminus would include the material site location, so the impacts of the material site are included in the Project’s environmental document.

Figure 2. East end terminus.



Figure 3. West end terminus.



Independent Utility Analysis (23 CFR 771.111(f)(2))

This Project would be usable and a reasonable expenditure, even if no additional transportation improvements within the area are made. Once constructed, the West Susitna Access road would provide improved public access for recreation, settlement, hunting, fishing, subsistence, agriculture, energy, forestry, mining, and tourism activities. These activities do not depend on additional public transportation enhancements to be constructed, as the road itself provides enhanced access to adjacent and nearby public lands. Recreational activities, such as biking and hiking, could occur along the road alignment, and the road would provide new access to several trails that cross the road alignment as well as access to the Susitna River and Alexander Creek. The road would provide access enhancement to lands designated for forestry, recreation, settlement, and agricultural development that occur along and near the new road alignment, as shown in the state management plans (DNR 1991; DNR 2008; DNR 2011; Agnew Beck Consulting,

LLC 2009); such access enhancement is not dependent upon other actions besides the subject Project.

Not Restricting Reasonably Foreseeable Transportation Improvements Analysis (23 CFR 771.111(f)(3))

No reasonably foreseeable transportation improvements are identified in the *State Transportation Improvement Plan (DOT&PF 2023)* in or near the Project area.

The Alaska Industrial Development and Export Authority (AIDEA) is working on a separate project for an industrial access corridor to advance access to several mines (AIDEA 2023). AIDEA's project will consider a variety of ore transportation options, including slurry lines, conveyor systems, and roads to advance economic development and jobs for Alaska. AIDEA is a public corporation of the State of Alaska. AIDEA's purpose is to promote, develop, and advance the general prosperity and economic welfare of the people of Alaska. The proposed AIDEA industrial access corridor project is focused on private mining access not public access; if a NEPA alternatives analysis is required for the AIDEA project, nothing related to the subject project restricts the consideration of alternatives for the potential AIDEA project (AIDEA 2023); and nothing in this project requires AIDEA's project to move forward.

DRAFT

References

US Department of Transportation (USDOT)

2024 Environmental Review Toolkit. Accessed at https://www.environment.fhwa.dot.gov/legislation/nepa/guidance_project_termini.aspx on July 11, 2024.

DRAFT

Draft Proposed Action

1. Introduction

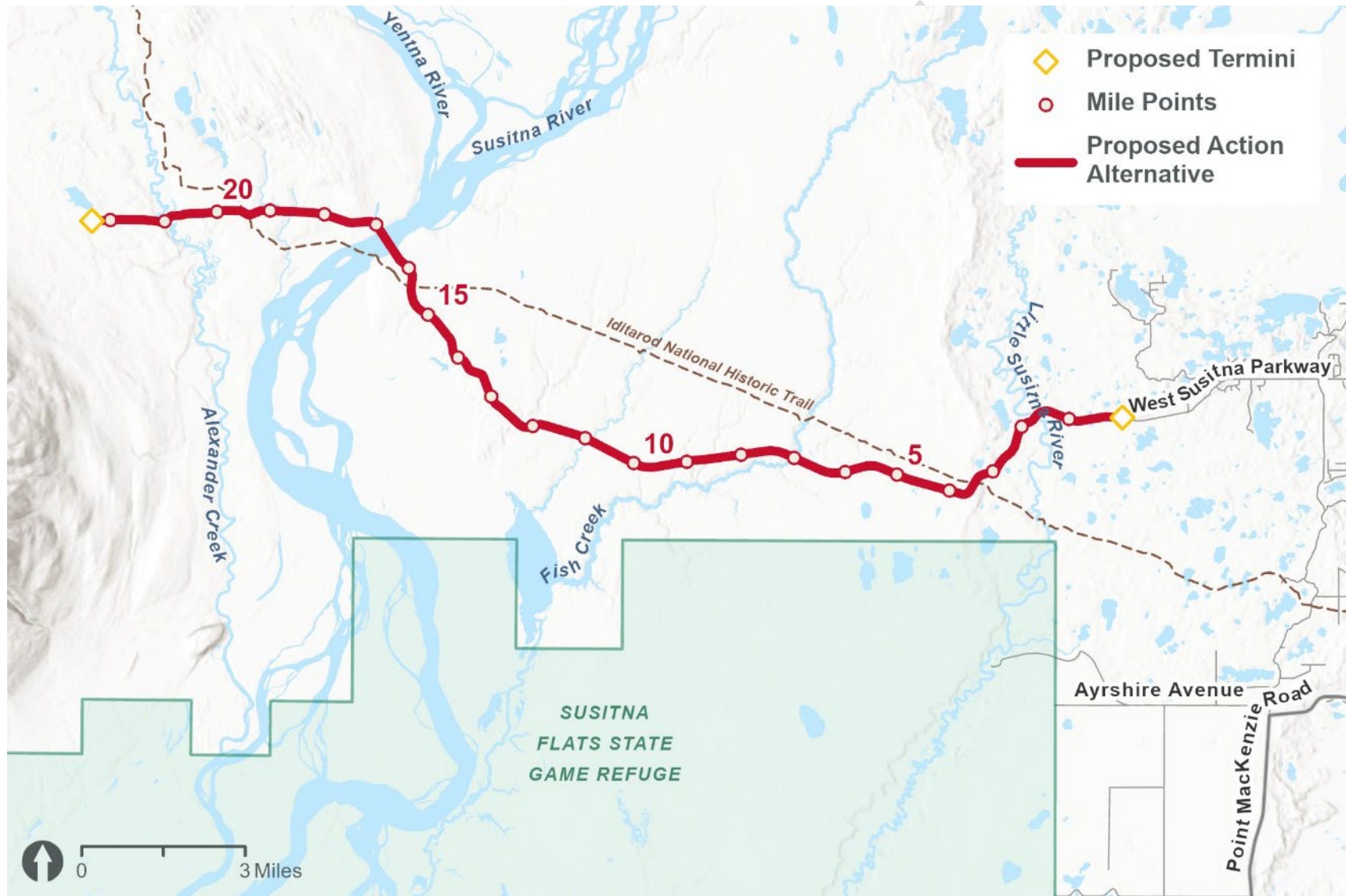
The purpose of this memo is to identify and present the proposed action alternative. The memo provides a preliminary recommendation on the proposed action and summarizes the reasons for the recommendation. During the scoping period, DOT&PF is interested in getting input from the public, Tribes, local governments and agencies on issues or concerns with the proposed action and suggestions for alternatives.

The West Susitna Access (WSA) Road Project (Project), managed by DOT&PF, aims to build a new public road that extends from the existing highway system near Matanuska Susitna Borough (MSB) Subdivisions through State lands west of the Susitna River (FIGURE 1). The Project would include the construction of infrastructure including access to the Little Susitna River, Fish Creek, the Susitna River, and Alexander Creek.

The proposed road would be designed for year-round, public use and cater to public recreational access to over six million acres of state lands. Public and commercial access to the road would foster economic growth in the Matanuska-Susitna Valley and West Susitna areas through enhanced recreation, energy, forestry, mining, and tourism sectors.

WestSu Access

Figure 1. Proposed Action



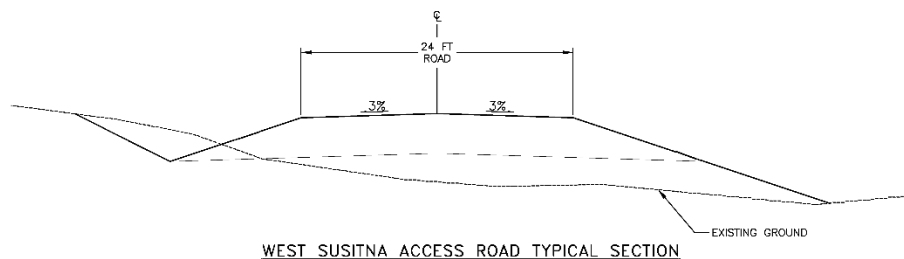
WestSusitna Access

West Susitna Parkway Alternative

The West Susitna Parkway Alternative is a 22.4-mile-long route that begins at the western end of the West Susitna Parkway. The proposed action would cross the Little Susitna River between river mile 36 and 37 before heading south to join the PMR. The proposed action was strategically chosen for recreational access, engineering feasibility, and limited resource impacts.

The proposed action alignment for the West Susitna Access Road will begin at the existing terminus of the West Susitna Parkway to the southwest of Big Lake. The alignment proceeds to the west and slightly north to its terminus approximately 2 miles west of Alexander Creek near an existing platted subdivision. The alignment travels predominantly through a mix of birch and black spruce uplands avoiding wetland impacts to the extent practicable. Bridges will be utilized at the Little Susitna River, Fish Creek, Susitna River, and Alexander Creek crossings. Boat launches and ramps are proposed near the Susitna River and Alexander Creek crossing locations. Culverts will be placed at other crossings as needed for drainage and fish passage. The proposed roadway typical section includes a 24-foot-wide top surface. Turnouts will be provided at regular intervals. Material sites will be developed along the proposed route to provide embankment material for both initial construction and long-term maintenance requirements.

Figure 2. Proposed Typical Section



Dear Commissioner Anderson,

On behalf of the Matanuska-Susitna Borough Fish and Wildlife Commission, a body created to advise and make recommendations to the Assembly, Borough Manager, and/or any state or federal agencies, departments, commissions, or boards possessing jurisdiction in the area of fish, wildlife, and habitat, please accept the following scoping comments on the proposed West Susitna Access Road project. The Commission is deeply concerned about potential adverse impacts on fish and wildlife habitat, struggling fish populations, displacement of wildlife, and limitations on existing fishing and hunting opportunities in the West Susitna region due to the scale and scope of the proposed project.

The Department of Transportation's (DOT) stated purpose and need for the 22-mile project includes increased access for recreation and settlement *and* the economic development of resources. ^[1] We are aware of the Alaska Industrial Development and Export Authority's (AIDEA) efforts to build the West Susitna Industrial Access Road – a 100-mile road to access mining claims in the West Susitna region. We understand that the Department of Transportation's (DOT) project will directly connect to the larger AIDEA project. Therefore, we encourage DOT and AIDEA, both state entities, to conduct an environmental review for the entire 100-mile project to fully understand the impacts. ^[2]

In addition, while we are not opposed to projects that increase access and encourage economic development, there are often significant environmental, social and economic costs that must be carefully evaluated prior to moving forward. Due to the scale of the entire project and the potential significant adverse effects to anadromous streams, connected wetlands, and fish and wildlife populations, we believe that a full environmental impact statement review is appropriate instead of the planned environmental assessment. ^[3]

In recent years, the Mat-Su region has experienced declines in salmon populations. Major threats to salmon include urbanization, overharvest, habitat alteration or loss, and the pressures associated with warming ocean and inland water temperatures. Roads are already a major contributing factor of habitat loss in the Mat Su, and the spread of invasive species like Northern pike and elodea due to increased access are all known contributing factors to declines in salmon populations. ^[4] ^[5] To date, the Mat-Su Borough, in collaboration with local partners, has spent significant resources replacing culverts to reconnect “1000 stream miles and more than 6000 acres of lake habitat for salmon rearing and spawning.”^[6] This ongoing work represents a major commitment by the Borough to revitalize our fisheries.

This massive investment is also one of the major reasons why we are concerned about the West Susitna Access Road project.

¹ West Su Access, Draft Brief Statement of Purpose & Need at 2.

² 40 CFR §1501.3(b) (“The agency shall evaluate, in a single review, proposals or parts of proposals that are related closely enough to be, in effect, a single course of action.”)

³ 40 CFR §1501.3(d)

⁴ Sepulveda, A.J., D.S. Rutz, S.S. Ivey, K.J. Dunker, and J.A. Gross. 2013. Introduced northern pike predation on salmonids in southcentral Alaska. *Ecology of Freshwater Fish* 22:268-279. DOI: 10.1111/eff/12024.

⁵ Bradley, P., C. Jacobson, and K. Dunker. 2022. Operational Plan: Alexander Creek Northern pike suppression, 2022-2024. ADFG Regional Operational Plan No. ROP.SF.2A.2022.21. 27 pp.

⁶ Matanuska-Susitna Borough Fish and Wildlife Commission, It Takes Fish to Make Fish Report, 2024.

The proposed West Susitna Industrial Access Road will cross 182 streams, at least 83 of which are known to support salmon populations. Productive salmon habitat requires a high diversity of freshwater habitats. [7] These habitats are created naturally as rivers and streams move back and forth across floodplains, often creating unique “off-channel” protective areas that are essential to salmon reproduction and juvenile survival.

Roads that bisect or parallel waterways prevent rivers and streams from naturally migrating across floodplains, leading to habitat fragmentation and loss. [8] Even with careful culvert placement, rivers, and streams will eventually migrate, cutting off access to upstream habitats, or if prevented from shifting, will become disconnected to critical off-channel habitats that are essential to salmon survival. In addition, roads are often designed to confine rivers to a particular channel, which can lead to dramatic changes in water temperature, chemistry, and flow. These impacts, coupled with the impacts of rising water temperatures due to climate change, have the potential to adversely affect all levels of the food chain, which decreases available nutrients and food sources needed for juvenile salmon survival. [9]

For these reasons, both the West Susitna Access Road project and the larger West Susitna Industrial Access Road project have the potential to cause significant adverse effects on fish and wildlife habitats and already struggling salmon populations throughout the West Susitna region. We urge the Department of Transportation to conduct a more rigorous environmental impact statement review of the proposed project and consider the significant environmental, social, and economic effects of the entire 100-mile road.

Thank you for your consideration.

Sincerely,

⁷ Brennan, S.R., D.E. Schindler, T.J. Cline, T.E. Walsworth, G. Buck, and D.P. Fernandez. 2019. Shifting habitat mosaics and fish production across river basins. *Science* 364:783-786. DOI: 10.1126/science.aav431

⁸ Angermeier PL, Wheeler AP, Rosenberger AE (2004) A conceptual framework for assessing impacts of roads on aquatic biota. *Fisheries* 29:19–29

⁹ Wenger, S. J., D. J. Isaak, C. H. Luce, H. M. Neville, K. D. Fausch, J. B. Dunham, D. C. Dauwalter, M. K. Young, M. M. Elsner, B. E. Rieman, A. F. Hamlet, and J. E. Williams. 2011. Flow regime, temperature, and biotic interactions drive differential declines of trout species under climate change. *Proceedings of the National Academy of Sciences of the United States of America* 108:14175–80. DOI: 10.1073/pnas.110309710