

Cummings, Laurie

From: Donna L. Graham [Donna.Graham@noaa.gov]
Sent: Tuesday, January 09, 2007 8:28 AM
To: jerry_ruehle@dot.state.ak.us
Subject: West Dowling Road Connection Project

The National Marine Fisheries Service (NMFS) has reviewed the West Dowling Road Connection Project. The described action will not result in any adverse effect to Essential Fish Habitat (EFH). No EFH Assessment is required and NMFS does not offer any EFH Conservation Recommendations. Further EFH consultation is not necessary. NMFS has no objection to the project. Please contact me if you have any questions. Thanks.

Johnathan Taylor
johanthan.taylor@noaa.gov



January 31, 2007

Strategic Planning
Telephone: (907) 265-2468
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Mr. Brian Elliott
Environmental Team Leader
Central Region Design and Construction
Preliminary Design and Environmental Section
4111 Aviation Avenue
Anchorage, Alaska 99519-6900

Re: West Dowling Connection Project, STP-0532(5)/55012
Environmental Assessment Review

Dear Mr. Elliott:

Thank you for the opportunity to comment on the West Dowling Road Connection Project. We support and understand the need for the project. The growth of traffic in this area and the resulting congestion needs addressing. We believe however that long-term implications of the Proposed Action have not adequately addressed the impact on the Alaska Railroad and the anticipated benefits from the project may not be realized.

The Alaska Railroad mainline runs through the heart of the project. During peak season, May through September, the Railroad operates numerous through trains from and to Seward, Whittier and the Interior. These trains include passenger trains as well as freight trains. In addition, the Railroad serves gravel production facilities in the project area that require slow movements through both the Arctic and 'C' Street at-grade crossings. Train traffic has increased and will continue to increase at a faster rate in the next ten years. The Railroad has already nearly doubled the number of passenger trains in the past ten years and we expect to double this again in the next ten years. Freight train activity will continue its steady growth as well.

The Proposed Action places the "connector" over the railroad tracks at Arctic Boulevard effectively pinning the railroad at-grade for the foreseeable future. This, at first blush, seems to be an acceptable solution especially when considering that the railroad must stay at-grade at the 'C' Street intersection. We would like an opportunity to discuss the possible closure of the Arctic Boulevard crossing if you agree this makes sense in the long-term.

The eventual solution at 'C' street will be a grade-separated crossing putting the road over the railroad tracks affecting both 68th and 'C' streets. This project is programmed in the 2025 Long-Range Transportation Plan as a "long-term" project. We believe increasing traffic congestion resulting from opening 'C' Street south to Minnesota Drive will demand a solution in the near-

term. The traffic congestion will be further exacerbated by the east-west corridor created by the Proposed Action.

Specifically, ARRC notes the following corrections to the design features called out in the Proposed Action:

- Figure 2.4 shows a single track, there are currently two tracks and bridge length needs to allow room for a third track to accommodate future growth of the Alaska Railroad
- The proposed bridge over the railroad tracks calls for a 22 foot clearance height above the tracks (TOR). AREMA Standard requires 23 feet.
- Crossing signals and gates will probably require relocation to accommodate the bridge structure
- When 'C' Street crossing becomes grade separated, current 80-car gravel consists could dump at QAP facility without decoupling. ARRC is contemplating moving to 100 plus car trains which will require decoupling at the Arctic crossing to avoid blocking traffic. Hence we believe a discussion closing the Arctic Boulevard road-rail crossing is warranted.

We look forward to working with the Department as this important project moves forward.

Sincerely

Bruce Carr
Dir., Strategic Planning

Cc: Tom Brooks, ARRC
Assistant Vice President and Chief Engineer

STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF WATER

Non-Point Source Pollution Water Control Program

555 Cordova Street
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January 31, 2007

Mr. Jerry Ruehle
Alaska Dept. of Transportation
And Public Facilities
PO Box 196900
Anchorage, AK 99519-6900

Subject: West Dowling Road Environmental Assessment
State Project No.: STP-0532(5)/55012

Dear Mr. Ruehle:

The Department of Environmental Conservation (DEC) received your letter of December 21, 2006 requesting review of the "West Dowling Road Connection Project, Environmental Assessment & Programmatic Section 4(f) Evaluation." The Alaska Department of Transportation and Public Facilities (ADOT&PF) proposes to reconstruct and extend Dowling Road from the Old Seward Highway to Minnesota Drive. Some of the major components of the project include:

- Construction of a 5 lane arterial road connecting Old Seward Highway to Minnesota Drive.
- The construction of multiuse pathways and sidewalks.
- A new bridge crossing Campbell Creek.
- Fill of wetlands and water of Tina Lake.
- An overpass crossing of Arctic Blvd. and the Alaska Railroad tracks.

The following comments are provided to address water quality issues contained with the Environmental Assessment (EA) and the proposed action.

1. Page 3.2-4. Add more discussion about construction through Tina Lake. Include a description of the techniques used to protect the portion of the lake not filled. Include a description of techniques used to protect water quality during the removal of the existing bridge and riprap at Campbell Creek and installation of the new bridge and riprap.
2. Page 3.3-5. Add more discussion about the potential impact of the road fill on Campbell Creek just downstream of the bridge.
3. Page 3.4-3. The proposed biofiltration swale should be sized such that water is treated fully before flowing into Tina Lake. Tina Lake is not a sedimentation pond for road runoff.

4. Page 3.4-4. Proper use of BMP's should prevent construction related impacts to water quality, thus preventing an increase in sedimentation in Tina Lake and Campbell Creek.
5. Page 3.7-6. Add more discussion about construction through Tina Lake.

For the Corps 404 application please include a description of how the rest of Tina Lake will protected during the fill of the northern side of the lake. Include a description of proposed measures to protect water quality during reconstruction of the Campbell Creek bridge. Also, include drawings of all the biofiltration swales on the project showing their locations, dimensions and anticipated maintenance schedule.

Thank you for the opportunity to comment on the EA. If you have any questions you can contact me at 269-7564 or william_ashton@dec.state.ak.us.

Sincerely,



William Ashton
Environmental Specialist

cc:

M. L. Plumb-Mentjes, ACOE
S. Seaberg, DNR/OHMP
M. McCulloch, ADOT
M. Nation, F&WS

C. Ballard, DNR/OPMP
H. Dean, EPA, AK Operations
D. Simpson, HDR
T. Tobish, MOA Planning

"Clean Water"



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 6898
ELMENDORF AFB, ALASKA 99506-0898

Regulatory Division
POA-2003-1007

Mr. Jerry O. Ruehle
Environmental Coordinator
Preliminary Design & Environmental Section
Alaska Department of Transportation
and Public Facilities
Post Office Box 196900
Anchorage, Alaska 99519-6900

Dear Mr. Ruehle:

Thank you for the opportunity to make comments on the Environmental Assessment (EA) for the West Dowling Road Connection Project [Project No. STP-0532(5)/55012. The Alaska Department of Transportation and Public Facilities (ADOT & PF) proposes to extend and reconstruct Dowling Road from Old Seward Highway to Minnesota Drive using federal funding through the Alaska Division Office of the Federal Highway Administration (FHWA). Two alternatives are being carried forward in the EA: a No Action Alternative and the Proposed Action which upgrades and extends Dowling Road between Minnesota Drive and Old Seward Highway. The proposed project begins in Section 6, T. 12 N., R. 3 W., S.M.; Latitude 61.1662, Longitude -149.8685 and ends in Section 1, T. 12 N., R. 4 W., S.M., Latitude 61.1591, Longitude -149.9081, Anchorage, Alaska.

This letter is prepared in response to your letter, dated December 21, 2006. Several of the proposed alignment segments would impact waters of the United States, subject to Section 404 of the Clean Water Act. We have focused our review of the EA on the sections specific to Department of the Army (DA) jurisdiction, i.e. wetlands and other special aquatic sites and responses to scoping comments. As the project does not have design details and has not gone out for DA public notice, our comments are preliminary.

Detailed comments are given in the attached memorandum.

Mitigation for impacts must be further worked out with this office and concerned resource agencies. The Anchorage Debit/Credit Method (December 2000) should be employed to calculate the debits associated with proposed impacts.

Dr. Mary Lee Plumb-Mentjes is the project manager for this permit application. She can be reached by phone at 753-2712, by e-mail at Mary.Plumb-Mentjes@poa02.usace.army.mil, or at the address above, ATTN: CEPOA-RD-S. For additional information about our Regulatory Program, visit our web site at www.poa.usace.army.mil/reg.

Sincerely,

A handwritten signature in black ink that reads "Hank A. Baij".

Hank A. Baij
Team Leader

Enclosure

Memorandum for Record

Date: January 29, 2007

Subject: West Dowling Road Connection Project: Comments on EA

Discussion:

1) Since water bodies and wetlands are both "special aquatic sites" subject to regulation under Section 404 of the Clean Water Act and both are often integrated into a water body/wetland complex, as they are at Tina Lake, it would be helpful to have water bodies and wetlands discussed in the same section, not two separate sections (3.2 Water Bodies and 3.7 Wetlands).

2) Page 1-4: Add reference to water body to "Tina Lake wetlands."

3) Page 3.2-1, Existing Conditions: The Corps also does not consider Campbell Creek or Tina Lake as navigable.

4) Figure 2.1 shows proposed road going through southwest end of lake, not the northern end.

5) Page 3.2-2, Tina Lake: Add statement that Tina Lake is a special aquatic site regulated under Section 404 of the Clean Water Act. Add statement that while the water column may be about 18 inches deep that the bottom is soft and a weighted body would sink deeper than 18 inches. Which side of the lake "appears to have been recently filled?" Isn't it the northern end that has been used as a snow dump, not the western side? Isn't the ditch that drains towards the wetlands on the east side? At the public meeting there was a poster with statement that a "storm drain" would be repaired rather than any reference to the stand pipe being relocated and re-established. The statement at the public meeting did not disclose the impact of the standpipe on lake water levels.

6) Page 3.2-3: Complete the description of where water goes from the storm drain leaving Tina Lake, i.e., that it "eventually flows into Campbell Creek, which flows into Knik Arm, a navigable, tidally influenced water body." This completes the hydrologic connection necessary for Federal Corps jurisdiction.

7) Pages 3.2-3 and 3.2-4, Environmental Consequences: Organization confusing, i.e., the alternating back and forth between discussions of Campbell Creek and Tina Lake. Again, integrating discussion of Tina Lake's wetlands and water body would be helpful. Clarify statement at end of No Action paragraph: "the lake level would be lower than intended;" note that it would be lower than intended when stand pipe was installed. Under Proposed Action for Tina Lake it would help to integrate the two paragraphs: state that the road would fill in 0.8 acre of the lake, but that re-establishment of the stand pipe would increase the water level by approximately 4 feet and describe new areal extent of lake. The statement (top of page 3.2-4) that "Property impacts are not anticipated as the lake level is being restored to a historical elevation." should describe and have illustration to show the extent of the new flooding; this lake level has not existed in recent past and the change may be hard for some businesses even if it corresponds to the 1973 Flood Elevation.

8) Page 3.2-4, Construction: More is needed on how water quality of Tina Lake and Campbell Creek would be protected. In particular with Tina Lake, the road will be built right through it.

9) Page 3.2-4, Mitigation: The new stand pipe would help keep water over a broader area and would make the lake deeper, but it would not be necessary "to keep water in the lake longer." More discussion is needed as to whether grasses should be planted along the new shoreline of Tina Lake. The steep sides of the new road embankment would have to be stabilized; there, plantings of grasses would be appropriate. Sedges would be more desirable than grasses on the edges

of the lake; it is possible that local seed/root sources would be more desirable than imported nursery stock. The new stand pipe would likely cause much existing vegetation to become inundated; perhaps some of that could be transplanted.

10) Page 3.3-3, top of page: describe how it is that projects costs would increase by \$6.5 million.

11) Page 3.3-3, third paragraph: how much of flood plain would still be impacted?

12) Page 3.3-3, fourth para. It would be helpful to state that these impacted areas of the flood plain are not wetlands. Note that "flood plain" as a noun; "floodplain" as an adjective. Same practice for "water body" and "stand pipe."

13) Page 3.3-5, Construction: More discussion needed about how water quality will be protected. Statements should be made about how siltation would be controlled; restriction of operation, storage, and maintenance of equipment, locations of stock piles.

14) Page 3.4-3, Reference is made to runoff being directed into the wetlands surrounding Blueberry Lake. Great care must be taken that the proposed biofiltration swale is effective in filtering sediments and pollutants; Blueberry Lake is now publicly owned; it was purchased with mitigation funds and is protected by a conservation easement. Similarly, the need for additional water in Tina Lake/wetland complex must be weighed against the possible addition of sediments and other pollutants from road runoff. This proposed biofiltration swale must be monitored for its effectiveness in trapping sediments and other pollutants. Would these swales at Blueberry Lake and Tina Lake ever be cleaned; during high water events would the pollutants be remobilized and wash into the lakes? As noted elsewhere, the text on the greater residence time of water in Tina Lake makes it sound as though it functions like a sedimentation pond to treat water before it enters a storm drain system. Tina Lake should be receiving clean water.

15) Page 3.4-4, Campbell Creek to Old Seward Highway: Similar concerns about the effectiveness and maintenance of biofiltration swale draining into Campbell Creek.

16) Page 3.4-4, Construction: Construction of new segments of Dowling will likely have massive areas of exposed soil surface; while the recent C Street extension was complicated by the surcharge operation, silt curtains were not found to be effective in many areas to control the erosion/siltation associated with construction. Piles of dirt were not vegetated or otherwise stabilized within 2 weeks. As noted in text, approximately 28 acres of ground-disturbing activity will occur. At least a Tina Lake, a plan probably involving a sedimentation pond must be put in place to allow silt to settle out from the large cut and fill operation.

17) Page 3.4-5, Arctic Boulevard to C Street, second and third para.: Focus of water quality concerns seems to be on water quality of what enters the storm drain, but the wetlands and Tina Lake are treated like a sedimentation pond.

18) Page 3.6-1, Vegetation: Consider differentiating white spruce (generally upland) and black spruce (generally wetland). Reference is made to primarily removing vegetation in the DOT ROW; however, in the vicinity of Tina Lake the construction would be north of the ROW. Raising the water level of Tina Lake, while desired as mitigation, would also have impacts on the vegetation that is there now.

19) Page 3.6-2, Figure 3-10: What is the standard for being "vegetation" since several areas that are vegetated are not marked green.

20) Page 3.7-1, Existing Conditions: Add date of pjd (1/18/06) and Corps's jd (2/14/06). Second para: Which wetlands that would be impacted by project are considered isolated by the Corps? Add wetland that is southeast of the former Alaska Seafood plant; it is U4 (Anchorage General Permits, Special Public Notice 2005-5, April 15, 2005, west of Rovenna); it was described in the materials sent by the Corps in its jurisdictional determination.

21) Page 3.7-2: The debit/credit calculation won't be finalized until later in the permitting process; however, the figure of 1.51 debits given on this page is different from the 2.06 debits described in 12/15/06 HDR Memorandum on this subject in Appendix E, Wetlands. The range in credits in that memorandum is described as 1.68 to 3.15.

22) Page 3.7-3, Figure 3.13: The colors of wetland classes in the legend are not the colors on the aerial photo.

23) Page 3.7-4, Ponds: Note the definition of a "pond." The Anchorage Wetlands Management Plan (p. 42) refers to "water bodies" which have a permanent minimum surface area at ordinary high water of more than 2,500 square feet. This size corresponds to the smallest water body which can be used, under normal circumstances, for nesting by more than one species or several pairs of one species, of local Anchorage area water birds. This terminology has been used also in the Anchorage Debit/Credit Method.

24) Page 3.7-6, Construction: Wouldn't construction at Tina Lake have to be in open water? No mention is made of that or how the rest of Tina Lake would be protected.

25) Page 3.8-2, Environmental Consequences. Clarify that no work will be done below the ordinary high water line (OHW) of Campbell Creek; work will be done below OHW of Tina Lake.

26) Page 3.21-4: Unclear statement: "Boniface Parkway is being extended to parallel Tudor Road.." Further, it should be clarified that these road projects are being proposed as possible actions.

27) Page 3.21-7, the impacts to water bodies like Tina Lake should be discussed in conjunction with the wetland impacts.

28) Draft Permit Application: The drawings are not adequate. Drawings should be provided that identify length, width, depth of excavation and fill in waters of the United States. The small area of wetlands near the old Seafood Plant (U4) needs to be added. A drawing should be added showing how the new bridge over Campbell Creek will not impact waters of the United States. At Tina Lake information should be provided about how the unusual (i.e., inwater) construction work will be managed to minimize degradation of Tina Lake. Drawings should be added about the biofiltration swales into Blueberry Lake, Tina Lake, and Campbell Creek, showing their location and dimensions. Additional information should be provided on how these swales would be maintained.

Mary Lee Plumb-Mentjes
Mary Lee Plumb-Mentjes
Project Manager



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240



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PEP/NRM

ER 07/65

Mr. Dale Lewis
Environmental Project Manager
Federal Highway Administration
709 W. 9th Street, Room 851
Juneau, Alaska 99802

Date: 2/6/07
Proj. # 55012

Preliminary Design & Environmental	PA	DL
Section Chief	PA	DL
Env. Coordinator	PA	DL
Env. Data Leader	PA	DL
Env. Analyst	PA	DL
Project File		<input checked="" type="checkbox"/>
Central File		<input checked="" type="checkbox"/>

Dear Mr. Lewis:

This is in response to the request for the Department of the Interior's comments on the Draft Environmental Assessment and Programmatic Section 4(f) Evaluation for the **Widening of West Dowling Road Connection Project in Anchorage, Alaska.**

The proposed action is to construct a five-lane arterial road connecting Old Seward Highway to Minnesota Drive in Anchorage, Alaska. The Campbell Creek Greenbelt (a Section 4(f) and 6(f) property) extends through the project area and would be crossed following an existing right-of-way for Dowling Road. Because of the north-south orientation of the greenbelt, it is not feasible to shift the project's location to avoid this Section 4(f) resource. Improvements associated with the project to provide greater recreation utility and usefulness of existing parkland include:

- Grade Separated Trail Crossing
- Bicycle/Pedestrian Newark Improvements along Dowling Road
- Section 6(f) Property Replacement Package

Section 4(f) Evaluation Comments

We concur with the assessment that there is no feasible and prudent alternative to the proposed action for the West Dowling Road Connection Project to cross the Campbell Creek Greenbelt. We also concur that appropriate measures have been incorporated into the project, including the Section 6(f) replacement package, to mitigate the adverse effects to the Campbell Creek Greenbelt (Foxtree Park, Lynwood Park, and Campbell Creek Trail).

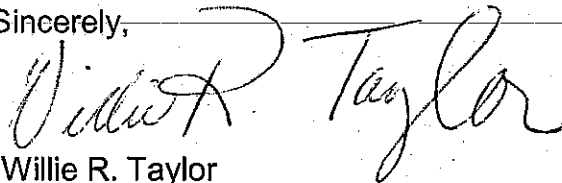
Page -2-

Summary Comments

The Department of the Interior has no objection to Section 4(f) approval of this project, provided that all mitigation, enhancement and beneficial measures, including the Section 6(f) land replacement package documented in the environmental assessment are included in the project plans.

We appreciate the opportunity to review and comment on the Section 4(f) Evaluation. Please contact Joan Darnell, National Park Service, Environmental Resources Team Manager (telephone: 907 644-3526) concerning comments on the Section 4(f) Evaluation.

Sincerely,



Willie R. Taylor
Director, Office of Environmental Policy
and Compliance

cc:

Jerry O. Ruehle
Alaska Department of Transportation
and Public Facilities
4111 Aviation Avenue
P.O. Box 196900
Anchorage, AK 99519-6900



MEMORANDUM

STATE OF ALASKA

Department of Natural Resources
Office of Habitat Management and Permitting

TO: Jerry Ruehle
Regional Environmental Coordinator
Alaska Department of Transportation

DATE: January 15, 2007

TELEPHONE: 269-6987
FAX: 269-5673

FROM: *for* 
Stewart Seaberg
Habitat Biologist
Office of Habitat Management & Permitting

SUBJECT: Project 55012
West Dowling Road
Connection Project

The Department of Natural Resources, Office of Habitat Management and Permitting (OHMP) has reviewed your letter of December 21, 2006 requesting comments on the Environmental Assessment (EA) for the proposed West Dowling Road Connection Project, State Project 55012. The EA addresses various components of the upgrade and extension of Dowling Road from the Old Seward Highway to Minnesota Drive. Some of the major components included in the project are:

- Construction of a 5 lane arterial road connecting Old Seward Highway to Minnesota Drive.
- The construction of multiuse pathways and sidewalks.
- A new bridge crossing of Campbell Creek.
- Open water and wetland fills associated with roadway construction along Tina Lake.
- Overpass crossing of Arctic Blvd. and Alaska Railroad tracks.

The following comments are provided to address specific fish, wildlife or permit authorization issues contained within the EA and proposed action.

Fish Habitat Issues

Campbell Creek. Campbell Creek, AWC# 247-60-10340 has been specified as being important to the spawning, rearing or migration of anadromous fish under AS 41.14.870(a). Campbell Creek supports king, coho and pink salmon spawning, coho and king salmon rearing as well as resident Dolly Varden. OHMP is pleased to see that the ADOT&PF is incorporating a replacement bridge over Campbell Creek. However, the EA understates the potential impacts to Campbell Creek for the bridge removal and construction. As the EA notes, the existing riprap boulder protection is within the stream, the bridge abutments are in close proximity to the stream and the structure constricts the channel. Removal of the old bridge abutments will impact the stream banks of Campbell Creek. The riprap, abutments and fill that is currently constricting the channel under the bridge will need to be removed and the stream banks restored. As part of this restoration the streambanks under the bridge and any streambank areas adjacent to the bridge disturbed during construction need to be revegetated with native riparian vegetation. OHMP Fish Habitat Permits will be required for the above activities.

The proposed action also calls for the stormwater between Cordova Street and the Old Seward Highway to be routed into "biofiltration treatment swales" and then drained into Campbell Creek. The

placement of any outfalls or downdrains into Campbell Creek for the discharge of storm water will also require an OHMP Fish Habitat Permit. OHMP would appreciate the opportunity to review the proposed treatment facility and discharge plans to ensure that fish habitat is adequately protected.

Wildlife Issues

Tina Lake. The proposed plan represents a good compromise that takes into account most of the prior concerns regarding minimization of fill within Tina Lake and its associated wetlands and restoring its wetland and palustrine values. However, there are a few additional issues that may need to be addressed in final designs. The EA notes the use of Tina Lake by mallards and assumes use by other common Anchorage area waterfowl. Tina Lake is also known to be used frequently by Canada geese. Revegetation of the new Dowling Road embankment along the north edge of Tina Lake with grasses will likely attract geese to the road embankment for feeding and loafing. This will increase the likelihood of geese crossing the road and being struck or causing vehicular accidents as drivers try to avoid them. Additionally, muskrat use of the roadbed may be a concern. Alternative treatments for the embankment along Tina Lake should be looked at to maximize habitat value along the lake shoreline while minimizing attracting wildlife to the embankment and roadway corridor. Along with the modified embankment treatment the proposed culvert connecting Tina Lake with the north wetlands could be oversized to encourage geese or other wildlife to use it as a travel corridor rather than crossing the road.

Campbell Creek Bridge. The proposed 12 foot clearance on the bridge is not adequate for the passage of moose as noted in the EA. Literature reviews and local information gathered by the ADF&G since 2004 indicate that a minimum of 13 feet clearance be provided for moose crossings. Additionally, snow pack accumulation, snow berms from road clearing, overflow icing and noise from overhead traffic can restrict moose utilization of these crossings. Based on these more recent information the ADF&G & OHMP recommend that at least 14 feet of clearance be maintained for moose passage. This is consistent with clearances provided on crossings of Campbell Creek at Abbott Loop Extension and recommendations made for crossings of Campbell Creek on the New Seward Highway project. The 14 foot clearances are needed to minimize disruptions to moose transit routes and habitat fragmentation. The bridge should also be centered over the stream to allow wildlife to cross under the bridge along either bank of the stream. It might also be useful to place the trail a foot or two higher than the adjacent stream banks. Utilizing this concept may allow for some separation between trail users and wildlife and keep the trail drier during flood flows and icing. Both banks should be revegetated with riparian vegetation.

Habitat Fragmentation. The EA also understates the importance of the remaining undeveloped patches of forested land particularly those in the area west of Tina Lake. The Campbell Creek greenbelt, Tina Lake, and undeveloped patches of forested land in the area are important wildlife habitat. The patch of forested habitat east of the Change Point Church facility (old seafood plant) and north of Raspberry in the Rovenna Street area is significant to moose. Moose use the area for feeding and resting and it is a key link in their movement corridor. The project will eliminate or permanently alter this block of habitat. These patches of habitat provide important transit and connectivity links between large blocks of natural habitat such as Kincaid Park to the west and Bicentennial and Chugach State Park to the east. Additionally, these patches provide some of the only remaining habitat for

wildlife in an area that is highly developed, making them more important for the species inhabiting them. They should not be characterized as marginal habitat.

I have also included some specific comments on technical corrections to the EA text in Attachment A. OHMP appreciates the opportunity to provide comments and recommendations regarding this project. Please contact Habitat Biologist Ed Weiss at (907) 269-5901 if you have questions or need further information.

Cc: M. McCulloch, ADOT D. Simpson, HDR M. Fink, ADF&G
M. Miller, ADF&G T. Tobish, MOA C. Ballard, OPMP
R. Sinnott, ADF&G A. Ott, OHMP M. Nation, USFWS
M. Plumb-Mentjes, ACOE H. Dean, EPA W. Ashton, ADEC
B. Lance, NMFS

Attachment A

Pg. 1-5 thru 1-6. Permit and Authorization references should be updated to include OHMP Fish Habitat Permits required for the Campbell Creek Bridge crossing removal, construction and bank restoration.

Pg. 2-2 & Pg. 3.5-3. The proposed action calls for the bridge to have a 12 foot clearance above the creek banks and notes there will be “no disruptions to wildlife transit routes”. As noted above a 14 foot clearance is needed to minimize disruptions to moose transit routes and habitat fragmentation.

Pg. 3.8-2 & Pg. 6.0-1. References the Catalog of Waters Important for the Spawning, Rearing or Migration of Anadromous Fishes (ADF&G 1998). The Catalog and Atlas have been revised three times since the 1998 revision. The current revision of the document became effective September 15, 2006.

Pg. 3.8-3. Notes that to the extent practicable the stream banks would be reseeded or replanted to maximize the amount of riparian vegetation near the bridge. Recommend removing the phrase “to the extent practicable” and state that the stream banks will be revegetated with riparian vegetation.

Pg. 3.7-6. Notes that construction related impacts may include temporary fill, vegetation removal and degraded water quality at staging areas (temporary storage areas) and 20 feet beyond the cut and fill prism. It also notes that these staging areas will not be placed in wetland areas. We recommend that these temporary staging areas also not be located with the riparian buffers of Campbell Creek.

Pg. 3.8-1 through 3.84. Per the above comments the project description, environmental consequences, construction, mitigation and authorization sections need to be updated to include the Campbell Creek impacts and benefits from removal of the old bridge, stream bank restoration, the revegetation of the banks, and the need for OHMP permits.

Pg. 3.9-1. Per above comments revise reference to “marginal wildlife habitat.”

Pg. 3.9-2. Notes that the project would increase habitat fragmentation but the EA does not identify or quantify this fragmentation.

Pg. 4.0-1. Text regarding consultation and coordination references the Scoping Summary Report produced by HDR as being included in Appendix B. The Scoping Summary Report and Scoping Summary Report Appendices which contained all the agency and public comments was not included in the paper copy of the document that we received. This coupled with the Section 4(f) Appendix A (subtitled “Copies and summary of all formal coordination comments received”) at the rear of the document gives the impression that the 4(f) comments are the only scoping comments received. The additional scoping materials should be included in the EA.