



**DEPARTMENT OF THE ARMY  
ALASKA DISTRICT, U.S. ARMY CORPS OF ENGINEERS  
REGULATORY DIVISION  
44669 STERLING HWY, SUITE B  
SOLDOTNA, ALASKA 99669-7915**

January 15, 2016

Regulatory Division  
POA-2013-396

Ms. Maryellen Tuttell  
DOWL HKM  
4041 B Street  
Anchorage, AK 99503

Dear Ms. Tuttell:

This is in reference to your permit application received on November 24, 2015, on behalf of Alaska Industrial Development and Export Authority (AIDEA), requesting Department of the Army (DA) authorization to impact waters of the United States in association with the Ambler Mining District Industrial Access Road (AMDIAR). The proposed AMDIAR would consist of a 211 mile long, controlled industrial access, roadway between the Dalton Highway and the Ambler Mining District. The project site is located in the foothills of the Brooks Range, beginning at the Ambler River, latitude 67.162° N and longitude 157.052° W, and ending near Milepost 161 of the Dalton Highway, latitude 67.081° N and longitude 150.345° W. This project has been assigned permit application number POA-2013-396, Kobuk River, which should be referenced on all future correspondence.

In a September 9, 2014 letter, we determined that your proposed project would involve placement of dredged and/or fill material into waters of the United States (U.S.) under our regulatory jurisdiction. As indicated in your November 24, 2015 application, the eastern portion of the alignment has been shifted north of Evansville/Bettles. We have not received information sufficient to complete a jurisdictional determination for the areas within this new alignment.

Your application is considered incomplete as it does not provide information needed to prepare a Public Notice that will generate meaningful comments. No further action will be taken, including issuance of a public notice, until the information requested below is received.

1. For the purposes of this review, it was assumed that all proposed discharges of dredged or fill material would occur within the area designated on the plan view maps by the dashed lines representing the daylight limits, the material site boundary, the water access road limits, or the landing strip limits. If any discharges of dredged or fill material would occur outside the dashed lines, including temporary discharges of dredged or fill material, provide the locations and limits on the appropriate plan view and cross section maps. Also state the maximum amount of these additional areas in Table 4 of the Permit Narrative.

Mechanized land clearing results in a discharge of dredged material into jurisdictional waters of the US, and requires DA authorization. Provide the locations, limits, and maximum amount of area where mechanized land clearing would occur outside of the dashed lines representing the daylight limits, the material site boundary, the water access road limits, or the landing strip limits.

Include a definition of daylight limits in the application.

2. Are both permanent and temporary discharges of dredged or fill material included in Table 4 of the Permit Narrative? If not, update Table 4, as well as the location maps, plan view drawings, and typical cross sections, to include all temporary discharges of dredged or fill material. Temporary discharges may result from activities that include but are not limited to: mechanized land clearing, staging areas, storage sites for overburden, stream diversions, coffer dams, and in-stream temporary construction access roads.
3. A delineation of wetlands and other waters has not been provided for the eastern portion of the alignment that was revised in October 2014. Therefore, the determination of impacts in this portion of the project is not based upon the same level of analysis as the rest of the project. Provide a wetland delineation for the new alignment. Alternatively, you may stipulate that the entire footprint of the relocated alignment, as well as all materials sites, access roads, and air strips, are located in waters of the US.
4. The footnote to Table 4 indicates that only impacts from the roadway are identified in the eastern end of the corridor, and that more material sites may need to be identified. The project description must include the maximum number of material sites, access roads, landing strips, and other appurtenant features that would be required along the entire alignment.
5. State the maximum width of the base of the roadway.

6. The project description does not include culverts that would be installed on the access roads, maintenance facilities, and air strips. Update the plan view maps and Table 1 to include these additional culverts.
7. A typical cross section is provided for a small culvert crossing on map page 51 of 417, but no such type of culvert is mentioned in the project description or in Table 1. Include a row for small culverts in Table 1.
8. Table 1 indicates that a major culvert would have a diameter of greater than 4 feet. The typical cross section in Appendix 5C indicates that a major culvert would have a diameter of greater than 10 feet. Provide the correct diameter in both Table 1 and/or in the cross section.
9. For a minor culvert crossing, a small culvert crossing, and a major culvert crossing in Table 1, state the maximum and minimum number of culverts that would be installed at each type crossing.
10. The application lists the dimensions of the materials sites and access roads as variable. The size of a typical material site is provided. No length is provided for the turnouts. Provide the maximum dimensions for each of these project elements. If impacts that would result from these project elements are not based on the maximum possible size of each element, update Table 4 to reflect this information.
11. The phase cross sections in Appendix 5-A must be revised as follows:
  - a. Correct the dimensions of the typical cross section drawings so that they accurately represent the size of the shoulders in the drawing and agree with the drawings in Appendix 5-C.
12. The plan view drawings in Appendix 5-B must be revised as follows:
  - a. Label the locations of turnouts;
  - b. Ensure that symbology for culverts is consistent with terminology used in Table 1 and the project description. Large culverts are labeled on the maps, but major culverts are used in the project description;
  - c. Show culverts that would be installed at all facilities, not just along the main travel corridor of the roadway.
  - d. The stream lines are difficult to see and are sometimes difficult to differentiate from contour lines, change the stream lines to make them more easily identifiable.
  - e. Label any named streams with their names as identified on a 7.5 minute USGS topo map.
  - f. Indicate the direction of flow for all streams.
  - g. Label property boundaries and the boundaries of Townships and Ranges on the main maps.

- h. Some portions of project elements have no base layer under them, display topography under all project elements.
- i. Station numbers, culverts, and bridges are missing from map pages 201 to 250 and map pages 325 to 417.
- j. Draw the Dalton Highway as a polygon on map page 417 so that the viewer can judge the size of the proposed road in relationship to the proposed roadway.
- k. Label the Dalton Highway on map page 417.
- l. The map symbols are not consistent throughout the map series. Water access road limits are used in the first 50 pages of the map series, in all other pages that show access roads, they are designated by the daylight limits symbol. If access roads and water access roads are distinct project elements, include further detail about water access roads in the project description.
- m. The contour lines change from 10 foot contours to 5 meter contours. Use consistent contour widths through the entire alignment. If this is not possible, use the same system of measurement (i.e. metric or English) through the entire alignment.

13. Provide the following additional typical cross section drawings:

- a. airstrips;
- b. maintenance facilities;
- c. turnarounds at access roads to water withdrawal sites;

14. The typical sections in Appendix 5-C must be revised as follows:

- a. Show daylight limits on each cross section;
- b. Add the fiber optic cable and associated appurtenances to the appropriate typical cross sections;

15. The title of Table 4 indicates that the table includes both wetlands (in acres) and stream (in linear feet) impacts. Only wetland acreage is provided in the table. Revise Table 4 to include the following columns and provide the requested information for each project element: wetlands – permanent (acres), wetlands – temporary (acres), stream impacts – permanent (acres), stream impacts – temporary (acres), open water impacts – permanent (acres), and open waters impacts – temporary (acres). Impacts to wetlands from mechanized land clearing which would occur outside of a permanent fill footprint should be included in the temporary fill totals. Alternatively, the applicant may stipulate that all impacts would be permanent and modify the table so that the acreage of all direct impacts to waters of the US (wetlands, streams, and open waters) is provided in a single column.

16. Revise Table 5 to add the following additional column: dredge/fill volume – temporary (cubic yards), and for both columns provide dredge/fill volumes for all waters of the US (wetlands, open waters, and streams);
17. The avoidance and minimization statement indicates that the maximum slopes would be 2:1, however the typical section and phasing cross sections indicate that slopes could be as much as 4:1, please clarify and adjust proposed amount of impact as necessary;
18. The project description includes a fiber optic cable. Provide more information regarding the appurtenances that would be associated with the cable. Would fiber optic cable branch off at any point? If so, indicate where any branches of the cable would be located. During what phase of the construction would the cable be installed?

We request you provide this information within 30 days. If no response is received, the application will be withdrawn and your file will be closed. Closure of the file at such time will not preclude you from reopening the file at a later date.

The information listed above is required in order to meet the requirements of a complete application as stated in 33 CFR 325.1(d). In addition to the items requested above, additional information may be required, per 33 CFR 325.1(e), in order to make a public interest determination and a determination of compliance with the 404(b)(1) guidelines. The necessary information will be requested after a complete application is received and evaluation of the application resumes.

Please contact me via email at Katherine.a.mccafferty2@usace.army.mil, by mail at the address above, or by phone at (907) 753-2692, if you have questions. For additional information about our Regulatory Program, visit our web site at [www.poa.usace.army.mil/Missions/Regulatory.aspx](http://www.poa.usace.army.mil/Missions/Regulatory.aspx).

Sincerely,



Katherine A. McCafferty  
Project Manager

BCF:

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Hard Copy:  
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## United States Department of the Interior

NATIONAL PARK SERVICE  
240 W. 5<sup>th</sup> Avenue  
Anchorage, Alaska 99501

January 22, 2016

Ms. Maryellen Tuttell  
DOWL HKM  
4041 B Street  
Anchorage, AK 99503

Dear Ms. Tuttell,

This is in response to your SF-299 Application for Transportation and Utility Systems and Facilities on Federal Lands submitted on behalf of the Alaska Industrial Development and Export Authority (AIDEA) and received by the National Park Service (NPS) on November 24, 2015. The request is for NPS authorization of a right-of-way (ROW) across Gates of the Arctic National Preserve for construction and operation of a road to support mineral resource exploration and development in the Ambler Mining District in northwest Alaska. The proposed Ambler Mining District Industrial Access Road (AMDIAR) would consist of a 211 mile roadway between the Ambler Mining District and the Dalton Highway. A 17-26 mile portion of the road would cross NPS lands in Gates of the Arctic National Preserve.

Guidance in preparing the SF-299 application was previously provided by the NPS to AIDEA in the document titled "Additional Instructions for an Application for Transportation and Utility Systems and Facilities on Federal Lands (299), Ambler Mining Road Project, Gates of the Arctic National Preserve, National Park Service."

Under Title XI of the Alaska National Interest Lands Conservation Act (ANILCA) and 43 CFR 36.5(c), the federal government has 60 days to review a SF-299 application for completeness and request additional information if necessary. This letter is to inform you that your SF-299 application is considered incomplete as it does not provide sufficient information for the NPS to review the proposed action. No further actions on the application will be taken until the information requested below is received.

### General

- What entity would hold the ROW permit and who would own the road and other improvements? Who would be responsible for maintenance?

## **Section 4**

- Pursuant to AS 44.88.020, AIDEA is a public corporation, and thus Box 4(b) should be checked, not 4(d). Note: the supplemental page has been completed correctly.

## **Section 7(a)**

- Identify the corridor endpoints for the information provided in Table 1. Use stationing or some other clearly definable feature referenced in the plan and profile maps.
- Clarify in a footnote to Table 1 that the wetland impact quantities listed in Table 1 are jurisdictional wetlands only.
- Add another line to Table 1 for non- jurisdictional wetlands impacts.
- Identify the limits used to calculate the overall project footprint. Is it the daylight limits or does it include areas of temporary activity within the construction limits of the project? Provide the footprint of temporary activities if not already included in the overall project footprint. Alternatively, you may revise the overall project footprint to reflect the construction limits for that portion of the project located within the Preserve.
- What are the criteria for stream impacts in Table 1 and how were they determined? How were the linear feet of disturbance figures generated?
- Add a new row in Table 1 for footprint of the primary road, exclusive of service roads, material sites and ancillary facilities. Clarify that the overall project footprint includes impacts of all types.

## **Section 7(b)**

- State whether the communications cable is required for the operation of the proposed road, or is for other purposes. State who will own and operate the fiber optic utility. Describe the associated facilities required for this utility and show where they will be located.
- Section 15(c) describes the potential for local communities to hire commercial transportation providers to haul fuel or freight to staging areas that would be accessed by those communities. What other ancillary facilities related to these activities, if any, are also proposed?

## **Section 7(c)**

- Table 2 indicates 32 major culverts. Table 3 on the same page indicates a combined total of 34 small and large major culverts. Table 1 in the USACE SF-299 application indicates 34. Please clarify.
- Provide the design speed for the road.
- Table 2 indicates 40 material sites for each alternative. Section 7(h) indicates 40 material sites for the entire preferred and 30 for the alternative alignment. Please clarify.
- Please provide an estimate of the gravel required within the boundaries of the Kobuk Preserve for the initial construction of the full buildout, Phase III, project as well as the anticipated gravel need for maintenance over the proposed 50 year term of the ROW.



Verify these needs have been allowed for in the determination of material site size and location.

- Typical fill sections shown in Appendix 4-A Fig 2A appear to be for good, moderate and poor soil conditions. Quantify the percentage of the ROW estimated be in good, moderate and poor soil conditions for both alternatives.
- The application indicates it may be a decade or longer before the transition from Phase II to Phase III development. Please elaborate on how drainage structures such as culverts, engineering methods for preserving hydrologic connectivity across the road in wetlands, and mitigation measures for addressing thawing of frozen soils in permafrost areas will be implemented in the proposed phased approach to construction.
- Provide information regarding the factors that will determine when the project moves from one phase of development to the next. What conditions will prompt the transition from the pioneer phase to construction of Phase II? What factors will determine the transition from Phase II to Phase III?

#### **Section 7(f)**

- Clarify whether traffic estimates include maintenance and non-mine related traffic occurring under other commercial uses. Provide estimates for this additional traffic if not already included.

#### **Section 7(g)**

- Please acknowledge that construction activities will need to comply with the provisions of the Migratory Bird Treaty Act.

#### **Section 7(h)**

- Reclamation and revegetation is also likely to occur during construction phases at temporary work areas and as part of the mitigations discussed 17(c). Reclamation and revegetation is also mentioned as a potential mitigation measure in 17(b). Please expand the discussion of reclamation and revegetation to include these circumstances.

#### **Section 13(b)**

- Please provide a comparative evaluation of the preferred and alternative corridor as done in section 6 of the DOT&PF Summary Report (Appendix 4-E) using the same 11 criteria. The limits of the evaluation should be station 3600+00 on the west end and station 5915+00 on the east end (west and east junctions of the north and south corridors). Provide the results in table format similar to Tables ES-5 and ES-6.
- The statement on page 10 that the southern option would require two additional medium bridges is at variance with the route summaries provided in Tables 1, 2 and 3 in Sections 7(a) and 7(c). Please clarify.

### **Section 13(c)**

- Although not mentioned in the Project Description, maps show the proposed road alignment crossing NPS-managed lands on the eastern side of Gates of the Arctic National Park, as well as the western national preserve unit. This occurs in T 25 N, R 16 W, Section 6, Fairbanks Meridian. That is a tract of federal land of approximately 240 acres that lies within Gates of the Arctic National Park and is congressionally designated wilderness. The NPS has no authority to issue a ROW permit for a road across this tract under ANILCA 201. The Title XI procedures for processing an application for a ROW which would cross designated wilderness, or which would cross an area for which the managing agency lacks authority to issue such a ROW, are presented in 43 CFR 36.7(b) and Section 1106(b) of ANILCA. Unless the application is revised, and the proposed alignment avoids crossing this tract in the eastern end of Gates of the Arctic National Park, the application will be processed in accordance with 43 CFR 36.7(b) and Section 1106(b) of ANILCA.

### **Section 14**

- In the Table 6 list of required permits, add the need for a review under Section 7(a) of the Wild and Scenic Rivers Act (Public Law 90-542; U.S.C. 12371 et seq.). Such a review is triggered by both the USACE CWA Sec. 404 and the Rivers and Harbors Act of 1899 Sec. 10 permit applications. The NPS performs this review under delegated authority from the Secretary of the Interior.

### **Section 15(b)**

- AIDEA identified the Elliot Highway Corridor route as the next best alternative based solely on the fact that it is the only alternative that completely avoids all conservation system units (CSUs). However, ANILCA allows for the route to pass through one or more CSUs, and thus avoidance of CSUs is not controlling. Please identify the next best alternative based on the same engineering, cost, environmental and other concerns that form the basis for selecting your proposed route (i.e., if the proposed route was not possible, which route would AIDEA apply for instead?).

### **Section 16**

- Provide the “Ambler Mining Region Economic Impact Study” RFP Number 2014-08000-2141 prepared by the McDowell Group.

### **Section 17(c)**

- Describe how impacts to permafrost and effects on surface water quality and quantity will be mitigated given the phased approach proposed for construction. For instance, how will drainage structures such as culverts be effective in ensuring free flowing water, preventing erosion and damming, and maintaining fish passage throughout the time

period suggested for the three phases of construction? Describe measures to ensure that road design and construction methods will be sufficient during the pioneer phase for the loads anticipated and that effects on permafrost condition and other impacts are mitigated.

- The water quality data referred to on p. 24 of the NPS Narrative is in Appendix 4K not 4G.
- Expand the discussion on revegetation and reclamation to include possible mitigation of permafrost loss and changes in seasonal water flow.
- Provide further discussion of measures to preserve groundwater and surface water connectivity across the road. The current statement is insufficient.

#### **Section 17(d)**

- “Where practical, overflow culverts will be installed or bridge spans increased to improve flood plain connectivity.” Explain the decision-making process that will determine when overflow culverts and increased bridge spans will be implemented.
- The cover sheet on Appendix 4-I indicates the printed copy is an excerpt from the Preliminary Wetland Delineation Report and that the complete report can be found on the DVD. However, the DVD also contains only the excerpts. Please provide the full delineation report in digital format.
- A Wetland and Floodplain Statement of Findings will be required, once a preferred alignment is selected, in order to maintain compliance with NPS Director’s Order #77-1 and NPS Director’s Order #77-2 and is required before a ROW permit can be issued.
- Provide current GIS data that shows the temporary and permanent impacts from road construction (referred to by the applicant as “daylight limits”) in equal detail for both northern and southern alignments within Gates of the Arctic National Preserve. The updated GIS layer should show the limits of construction and disturbance footprint for the two-lane road, all material site boundaries, water access roads, airstrips, vehicle turnouts, and all other ancillary construction activity locations and extent within the park boundaries for both alternatives. All information provided should be updated to reflect the full project build out (Phase III) and include all construction daylight limit boundaries for permanent and temporary activities.
- Complete a functional assessment of existing wetland conditions, and evaluation of functional change resulting from the road construction, of the affected wetlands within Preserve boundaries for each alternative alignment, using the Hydrogeomorphic Approach (HGM), Rapid Assessment Level. The Alaska Interior Wetlands Functional Assessment Guidebook is available at: <http://dec.alaska.gov/Water/wnpspc/wetlands/interiorhgm.htm> and [https://dec.alaska.gov/water/wnpspc/wetlands/interior\\_operational\\_draft\\_may\\_1999b.pdf](https://dec.alaska.gov/water/wnpspc/wetlands/interior_operational_draft_may_1999b.pdf)
- Provide the HGM Assessment Report as described in the Guidebook. The report must contain an evaluation of the effects of construction on the functional values of the different types of wetlands including unique systems such as the Nutuvukti Fen, floodplain wetlands of the three unnamed rivers, and the Kobuk riverine crossing.

- The evaluation must give significant consideration to, and evaluation of, groundwater and surface water hydrology impacts that will occur in wetlands that are up-gradient and down-gradient of any road construction disturbance footprint.

#### **Section 17(e)**

- Provide an electronic copy of the CadnaA model used to create this analysis.

#### **Section 17(f)**

- Supply GIS layers for the northern and southern alignments at an equal level of detail. Include proposed material and rip rap sites, proposed landing strips, access roads, and stream crossings for the alternative (southern) alignment.
- Please verify the potential impacts areas used in Tables 10, 11 and 12 have been revised to incorporate the new alignment at the east end of the project.

#### **Spills**

- Describe the chemical composition (i.e. copper sulfide) and typical concentration of the ore concentrates expected to be transported from the Ambler Mining District.

#### **Cultural Features**

- Many sections of the proposed alignment are outside of the area covered by the preliminary archaeological surveys. Describe plans and schedule for conducting a complete inventory historic properties within the proposed ROW and the broader project area to include material sources, access roads, material sites, airstrips, and other facilities.

#### **Appendix 5-B**

- Provide stationing, drainage structures and other information missing from pages 201 to 250 and 325 to 417 of Map Set 1.

The Title XI regulations (43 CFR 36.5(d)(1)) specify that applicants have thirty (30) days from receipt of notification (i.e., receipt of this letter) to provide the requested additional information, but if the applicant needs and requests additional time, the federal agency can grant such additional time. Conditional on granting such a request would be agreement by the applicant that the application submission date would change to the date the additional information is provided. If more time is needed, please let us know.

In order to expedite this process, we are emailing this letter to you with a return receipt request. We will use the return receipt date as the beginning of the 30-day period. A hard copy of this letter will also be sent for your records.

The information listed above is required in order to meet the requirements of a complete application as stated in 43 CFR 36.5(c)-(e). In addition to the items requested above, additional information may be required in order to complete processing of the application and prepare the environmental and economic analysis required by Section 201(4)(d) of ANILCA.

Please contact me by email at [joseph\\_durrenberger@nps.gov](mailto:joseph_durrenberger@nps.gov), by mail at the address above, or by phone at (907) 455-0684, if you have questions.

Sincerely,

Joe Durrenberger P.E.  
Project Manager

cc:  
Serena Sweet, Bureau of Land Management  
Katherine McCafferty, U.S. Army Corps of Engineers  
James Helfinstine, U.S. Coast Guard

bcc:  
Superintendent, Gates of the Arctic National Park and Preserve  
Chief, Land Resources Program Center, Alaska Region, NPS



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
Central Yukon Field Office  
1150 University Avenue  
Fairbanks, Alaska 99701  
<http://www.blm.gov>



*In Reply Refer To:*  
F-97112 (2810)  
032 rw

JAN 21 2016

CERTIFIED MAIL – 7013-1710-0002-3807-7935  
RETURN RECEIPT REQUESTED

Alaska Industrial Development  
and Export Authority  
Attn: Mark Davis  
813 West Northern Lights Boulevard  
Anchorage, Alaska 99503

Dear Mr. Davis:

The Bureau of Land Management (BLM) Central Yukon Field Office is in receipt of your SF-299 Application for the proposed Ambler Mining District Industrial Access Road (received 11/24/15). The BLM has serialized the case file (reference number F-97112), reviewed your application in accordance with 43 CFR 2804.12 and 43 CFR 36.5, and found your application to be incomplete.

You propose to construct an industrial access road from the Dalton Highway west to the Ambler River which would cross segments of public lands managed by BLM. Additional ancillary and supporting activities proposed include but are not limited to installation of airstrips, a fiber optic communications line, bridges and culverts.

In order for BLM to be able to deem the application complete and continue its processing, clarification or submission of information to address the following deficiencies is required:

- Indicate who the appendices, maps, construction diagrams, etc. listed in the SF-299 pertain to - BLM, National Park Service or common to all agencies/landowners.
- Clarify what is meant by the requested 250-foot width of the right-of-way.

- Is this intended to be the operational right-of-way width post-construction, and/or is it the width for construction purposes?
- Would this width be for the entire length of the project or are there sections where it would be narrower?
- Would there be turnouts on BLM lands and if so what would the dimensions be including the road and the turnouts?
- Two airstrips are depicted on the map yet there appears to be no mention of construction of specific airstrips or access roads in the proposed action. Identify and describe any airstrips and access roads that would be constructed, including proposed locations, and indicate whether they would be for road construction and/or road maintenance purposes.
- The proposal includes installation of a fiber optic communications line and associated facilities. Note: These facilities may be subject to separate permitting with the BLM.
  - How is the fiber optic line related to the road?
  - Is it necessary for the construction, and/or operation and maintenance of the road?
  - Who will own and operate the fiber optic line?
- Describe the associated facilities that are required for the fiber optic line, and on a map show where they will be located. Include a plan of operation and maintenance, including a non-native invasive weed management plan.
- Provide a summary table of BLM managed lands (this includes both State and Native corporation selected lands) showing impacts (as described in Appendix 3), legal description, acreages, lengths and access needs for the entire project.
- All alignment maps need to depict the legal description including sections, townships, ranges and meridians.
- Clarification that alignment sheets include all aspects of the project, over its entire course. If this mapping is lacking, it needs to be provided for the whole project.
- All maps must have land status indicating the land owner. If too convoluted with depiction of legal description, provide secondary maps.

- Provide a synopsis of proposed mineral material sites, airstrips and access roads located on BLM managed lands, and depict them on a map.
- Provide a list of types and quantities of mineral materials available and needed.
- Include a list (stream names, legal descriptions) and mapping of water crossings.
- Include information, descriptions, and mapping of any temporary construction, staging areas, and camps for the entire project, including any such facilities along the Dalton Highway. Note: Temporary facilities in the Dalton Utility Corridor may be subject to separate permitting with the BLM.
- Provide 1:63,360 scale mapping of the BLM managed lands with proposed routes.
- The application should contain a *Preliminary Cultural Resource Analysis* detailing the location and National Register status of cultural resources within the project's Area of Potential Affect (APE). The APE should be defined to include all locations that have the potential to be impacted by the construction of the proposed road and any ancillary features (i.e. fiber-optic, gas and utility, bridges, culverts, spur roads, etc). The scope of the report needs to be the entire project regardless of land status as the BLM will be required to conduct Section 106 Review on all lands affected by the proposed action. The report needs to clearly indicate where archaeological inventory has been conducted and where inventory data is lacking within the APE.
- Provide shape files of routes and all other GIS-mapped information.

As the planning process moves forward, additional resource-specific information may be required in order for the BLM to complete the National Environmental Policy Act (NEPA) analysis. Specific requests will be made in the event that additional information is required.

Under 43 CFR 36.5(d), you must furnish the information requested above within 30 days of receipt of this letter. If you need more time to provide the requested information, you may request additional time to fulfill the request as per 43 CFR 36.5(d)(1).

Please also note that a cost reimbursement agreement will be required pursuant to 43 CFR 2804.14 and 2804.19, before BLM proceeds with its processing of the application.



Please send the requested information to Robin Walthour at the Central Yukon Field Office. For further information please contact Earle Williams in the BLM Alaska State Office at (907) 271-5762.

Sincerely,



Timothy J. La Marr  
Field Manager  
Central Yukon Field Office

Copy furnished to:

Dowl HKM  
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Anchorage, Alaska 99503

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Federal Highways Administration  
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Earle Williams (940)

U.S. Department of  
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Commander  
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16591  
January 22, 2016

Maryellen Tuttel  
DOWL HKM  
4041 B Street  
Anchorage Alaska 99503

Dear Ms. Tuttel,

Your Coast Guard permit application for numerous bridges spanning several major rivers within the Alaska Industrial Development and Export Authority (AIDEA) proposed 211 mile long Ambler Mining District Industrial Access Project corridor outlined in your Transportation and Utility System Right-of-Way application (SF299) under the Alaska National Interest Lands Conservation Act (ANILCA) can not be processed at this time. It is incomplete and does not meet the requirements as outlined in our application guidelines.

As we have stated previously and outlined in our application instructions we need site-specific information and plan sheets for each individual bridge crossing as well as completed NEPA documentation once the NEPA process is completed for the entire 211 mile transportation system.

The information you have provided will allow our agency to make a preliminary jurisdictional determination of waterways that will require Coast Guard Bridge permits and/or reviews prior to construction. We will provide a list of these waterways in the very near future.

Although you submitted drawings illustrating typical bridge sections, we can not determine navigational openings at this time. This will not be possible until an exact route is selected and exact bridge locations are illustrated via individual application drawings.

If you have any questions, please contact me at 463-2268.

Sincerely,

A handwritten signature in black ink, appearing to read "James Helfinstine", with a large, stylized initial "J" that loops around the first part of the name.

J. N. HELFINSTINE  
17<sup>th</sup> District Bridge Program Administrator,  
Division of Prevention &  
Waterways Management Branch  
U. S. Coast Guard  
By direction of the Commander