

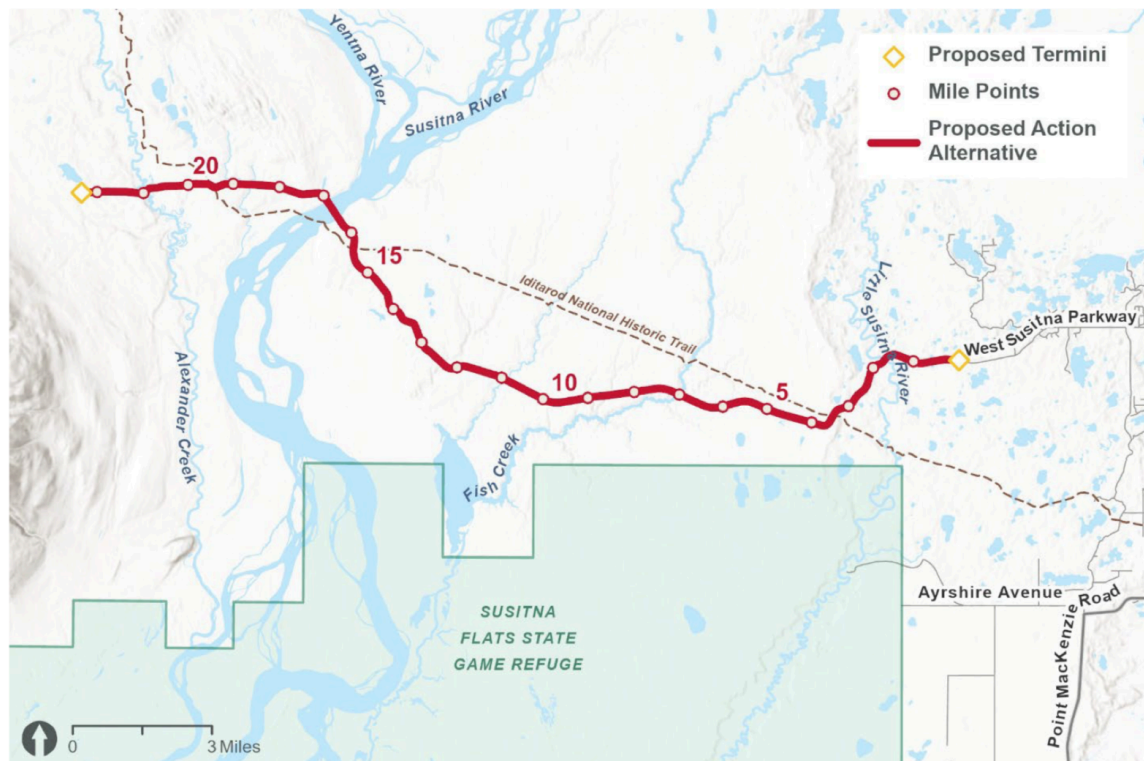


Talking Points: West Susitna Access (DOT)
Comment Period: July 23, 2024 through August 23, 2024

Background:

In July of 2023, DOT took over the first portion of the West Susitna Industrial Corridor and bridge across the Susitna as part of the DOT STIP plan from 2024-2027. This rebrand of the project segments the project into smaller pieces in an attempt to obscure the massive impacts of the entire project: a 100+ mile industrial corridor through a currently roadless swath of the Susitna drainage.

In early July of 2024, DOT announced the opening of a scoping comment period in preparation for an Environmental Assessment prior to the projected construction start timeline of 2025. The comment period, to assess the potential impacts of the project, will open on July 23rd and close on August 23rd.



To learn more about the project in its entirety, see the SRC website:

<https://www.susitnarivercoalition.org/west-susitna-mining-rd>

For more information, see DOT's project website:

<https://westsuaccess.com>

To sign up for notifications, use this link:

<https://westsuaccess.us7.list-manage.com/subscribe?u=42ef8469ce524347e7b99012f&id=136e77acad>

First Step- Urgent Action!:

The Susitna River Coalition encourages you to act first with an appeal for an extended comment period. To do this, email your extension request to: comments@westsuaccess.com

You can state that the 30 day comment period is insufficient for a project of this scope during the busy summer season. For example, here is the language we have used:

"I formally request an extension of the public comment period for the West Susitna Access Project from 30 to 90 days. The project website indicates that the project has grown significantly in scope from what was originally proposed in the DOT STIP 2024-2027 plan, and thus requires supplementary review. The comment period is taking place during the extremely busy summer season when most stakeholders will be unable to thoughtfully participate in the comment period. Because of this, it is necessary to extend the comment period to adequately allow Alaskans to participate in the public process."

How to Comment:

DOT has provided three ways to send in comments.

1. Email: Email your written comment to: comments@westsuaccess.com
2. Online Form: Fill out the online form here: <https://westsuaccess.com/comments/>
3. Physical Mail: Download and send form
https://westsuaccess.com/wp-content/uploads/2024/07/20240718_WestSu_Comment_Form_7-23-to-8-23.pdf

West Susitna Access Road Project
c/o HDR
582 E 36th Ave, Ste 500
Anchorage, AK 99503

Two in person public meetings will also be held as part of the scoping process:

Anchorage Meeting

August 14, 2024

Loussac Library, Atrium B
3600 Denali Street, Anchorage, AK 99503
Wednesday, August 14, 2024
3:30 – 6:30 p.m.

Matsu Meeting Details

August 15, 2024

Wasilla Public Library, Large Multi-Purpose
500 N Crusey Street, Wasilla, AK 99564
Thursday, August 15, 2024
3:30 – 6:30 p.m.

For those that cannot make the in-person meetings, there will be a virtual “Open House” on August 14 – 23, 2024. That can be accessed by seeing the project website at:

<https://westsuaccess.com>

Preparing Your Comment:

Comments from the public are invaluable in this process as they continue to build a case against the project. Your opinions are important to the future of Alaska and should be heard. Please encourage those in your community to contribute their comments as well.

Comments on the DOT project can be short, but should be meaningful and substantive (point to a specific problem or concern/provide an actionable solution). We recommend stating your connection to the region and specific concerns that you have about the project, environmental or otherwise.

The Susitna River Coalition encourages a “No Action” alternative to this project. This has not been provided as an option by DOT, but due to the project’s unpopularity in every iteration, we encourage the state to provide this option to their public.

If you would like assistance with drafting your comment, we are happy to help!

Please email margaret@susitnarivercoalition.org for assistance.

Points to Consider First in Comments:

1. A “No Action” alternative should be offered to the public. Repeatedly, this project has been demonstrated to be unpopular with the public in any iteration both at the Borough and state level. NEPA 40CFR 1501.9,(e)(2) indicates that a No Action alternative should be included as an option. The public deserves an opportunity to choose “No Action” and reject the project in its entirety.
2. Alternative routes should be included as part of the EA. While three other alternatives have been identified for the eastern portion of the route, they do not adequately qualify as additional routes. Entirely different route alternatives should be provided for all portions of the project so that the public can provide input. Additionally, these alternatives do not have any associated cost estimates, in-detail route information, including waterbody crossings, or justification.
3. Courts have stated that this (an EA in lieu of an EIS) is allowable only if the segmented actions each have ‘independent utility.’ (Thomas v. Peterson 753 F.2d754, 9th circuit 1985, 40 C.F.R. 1508.25, 40 C.F.R. 1508.27(b)(7). If one segmented action makes no sense without the other segmented actions, then the agency must consider them all as one larger action in an EIS.” The AIDEA portion of the West Susitna Access Road extends from the end of the DOT portion and to the Estelle Claim in the Alaska Range. This proposed, and deceptively identified as a “separate project,” clearly does not make sense without the DOT portion of the project. With this in mind, an EIS is legally required.
4. Using this same precedent, many other development projects are slated for the region that would not be considered without a road corridor. For example, US Gold Mining has repeatedly stated that their proposed, currently exploratory, mine would not be feasible without a road. Additionally, other projects such as the Flatlands Coal and Carbon Capture project are also along the corridor. Because these projects, based on the statements of their developers, are not feasible without the road project, all industrial projects should be considered within an EIS to gain a true understanding of the cascading impacts of the West Susitna Industrial Corridor.
5. Any EA or EIS not only examines fish and wildlife but the human environment. The bridge across the Susitna is designated to be at Su Station, a site that is well known for its rich cultural and archaeological significance. Development at this site requires consultation with tribal entities and more in depth cultural studies. In addition to construction of a bridge at Su Station, more cultural field work must be done. The cultural studies conducted for the West Susitna Access project were conducted at the wrong time of year, when brush had already grown up and it would be functionally impossible to identify culturally significant sites. These studies need to be redone with this in mind, consulting tribes and archaeologists to determine the ideal time to conduct the necessary cultural heritage assessments.

6. The Susitna Flats State Game Refuge is a specially managed region replete with valuable wetland habitat. Under no circumstances should a road be built through the region when other options, including a No Action alternative, are available. For example, Flatlands Energy has identified an alternative route through the region.

Additional Points to Include:

1. The Susitna River watershed is an important salmon bearing system in Alaska. The Susitna and its tributaries drive a robust economy of tourism, sport and commercial fishing. It is imperative that a major bridge across the Susitna River and crossings at smaller tributaries receive astute attention to detail. This requires an EIS and additional studies to ensure that these economically and ecologically important populations remain healthy .
2. It is currently unclear whether the road would be open for four-season use. Prior to moving forward with any kind of assessment, the state should solidify its plan for the road. Chemicals used on roadways in winter can have ill effects on fish, wildlife, and water quality.
3. The proposed road corridor crosses the historic Iditarod trail two times throughout this portion of its run. What is in place to mitigate conflict between trail users and road traffic?
4. Vegetative invasive species are a significant threat to intact ecosystems causing costly damage. Disturbed ground, including roadways, provides habitat ripe for invasion of these species. If a road is to be constructed into a currently roadless region, a plan of action must be in place in order to mitigate the colonization and neutralize the threat of invasive species.
5. The project information page indicates that construction will begin in 2025. This timeline is not feasible. Once the comments from this scoping process have been acquired, developers will require a field season to address any issues identified during scoping and adjust the route. This timeline should be adjusted to accommodate a realistic timeframe if development of this project is to responsibly move forward with the stated intent to benefit all Alaskans.
6. The project crosses two Susitna Basin Recreation Rivers, Alexander Creek and the Little Susitna River. Though the Susitna Basin Recreation Rivers Management Plan does not impede development, the plan is currently in revision. Any decisions regarding development across these rivers should be compared with the DNR Susitna Basin Recreation Rivers Management Plan and should be put on hold until the state legislature has the opportunity to approve revisions in the 2025 legislative session.

7. This project is being designated as a “pioneer road.” According to the MatSu Borough, a pioneer road does not need to meet the same requirements as a true road. What are the criteria for which culverts and bridges will be constructed? All culverts should be built to the highest possible standards as outlined by the USFWS. See the linked article.
<https://www.fws.gov/alaska-culvert-design-guidelines>
8. According to the MatSu Borough, Pioneer Roads are not maintained by the Borough. With this in mind, who will be responsible for maintenance of these culverts and bridges?
9. No culverts have been identified on the Refuge Avoidant or West Susitna Parkway Alternative routes. This indicates that DOT has not initially investigated these alternatives for feasibility and impacts and their inclusion is performative, it should adequately assess these alternatives and provide all necessary information like culvert locations, bridges, and recreational facilities to the public as part of the assessment. The public cannot adequately evaluate these alternatives without more information.
10. In a June 2024 MSB Fish and Wildlife Commission special meeting referencing the West Susitna Access project, the Alaska Department of Fish and Game indicated that the GMU in question would likely change from a moose harvest ticket to a moose draw if the new roadway is constructed. This indicates that there would be significant enough impacts to moose populations, either by harvest or roadway incursions, to merit consideration of a revision of management practices in one of the most important moose hunting regions of the state.
11. The purpose of the DOT portion of the West Susitna Access project is to provide “public access to more than 6 million acres of State lands for recreation and other purposes, enhancing the region’s transportation infrastructure and economy” and “The proposed project also supports the development of infrastructure facilities and improvements to assure greater utilization, development, reclamation, and settlement of lands as outlined in Article VIII, Section 5 of the Alaska Constitution.”
While we recognize Section 5, DOT is omitting the equally important Article VIII, Section 2 that identifies that conservation is of equal weight with development and utilization. With this in mind, it is counter to the Alaska Constitution and unjustified that an EA would be done in lieu of an EIS. Any development should take place with the most rigorous environmental studies in place.
12. While the AIDEA portion of the road is an alleged separate project, it would undoubtedly be populated by significant industrial traffic. In other portions of the state, there have been conflicts between industrial traffic and civilian traffic (i.e., Man Choh). How does the state plan to mitigate conflicts between these two user groups on the ostensibly purported recreation road that DOT is putting in?
13. The state often compares the Dalton Highway to the proposed West Susitna Access corridor in an effort to ameliorate the public to its purported benefits. In reality, these

projects are incredibly different. For example, the region north of Fairbanks sees less traffic than an industrial road in the Mat-Su might see. The Mat-Su Borough is the fastest growing region in the state of Alaska. User groups on the Dalton have reported a decrease in the quality of their recreation experience within the road corridor. How does DOT propose to preserve the human environment and the quality of the user experience within the West Susitna Access Corridor if the project moves forward?

14. Currently, the MatSu Borough is in the process of revising its Waterbody Setback Ordinance. While the ordinance does not currently consider rivers and streams in this setback ordinance, there should be some measures in place to protect water bodies as the region develops. What plan does DOT have in place to mitigate impacts to water bodies, preserve water quality, and maintain riparian habitat?