

# Tim Swezey

## Recipients

Sara E. Johnson  
Estrella F. Campellone  
Army Corp of Engineers  
Anchorage, Alaska

## CC

Ben Wagner  
State Dam Safety Engineer  
Department of Natural Resources  
Division of Mining, Land & Water  
Dam Safety and Construction Unit  
Ph: (907) 269-8636

Crystal Moenaert  
Habitat Biologist 3  
ADF&G Habitat Section  
Ph: (907) 861-3204

Chris Brockman  
Area Biologist, Palmer  
GMU 14(A, B), 16  
Ph: (907) 746-6338

## RE SOA Hazard Class II Embankment Dam to Build Island Lake Float Plane Facility

Ref# POA-2023-00398

Waterway; Little Meadow Creek

To all concerned,

I oppose the approval of project **POA-2023-00398**.

I am requesting a "PUBLIC HEARING" concerning the proposed **Embankment Dam** to increase the surface area of Island Lake by three acres in order to build a 31 slip float plane commercial facility.

I am a resident of Meadow Lakes and live near Cloudy Lake which is a Coho Salmon rearing lake. Little Meadow Creek provides salmon spawning, and the Mooseybou wetlands at the outlet of Island Lake provides clean water, buffers the runoff during spring break-up, and the food needed by the fry in Little Meadow Creek and Cloudy Lake.

The developer doesn't seem to understand the liabilities that he will incur with the creation of this project.

While reviewing the USACE application I decided to reframe the questions being asked by the residents. I decided to focus on the construction of the facility and realized it is a type of earthen dam.

Once I started asking dam questions, I found ADNR's [Alaska Dam Safety Program](#) PDF. My understanding of the document is that the project is **Hazard Class II Embankment Dam**.

Any one of the following criteria classifies this project as a dam.

- 50 acre feet or greater volume – Island Lake will be increased to about 88 acres of surface area
- Little Meadow Creek relationship to the dam
- N. Pittman Road relationship to the dam
- Buildings south of the dam

**The nature of the project requires an Environmental Impact Statement.**

Because of the concerns of the residents, the environmental impact to Island Lake, Little Meadow Creek, Cloudy Lake. Including the lack of understanding by the developer that his plan to dredge up dirt to build the dam and the slips may not be feasible.

This project requires a public hearing to reassure the stakeholders that every issue will be addressed and that if the project causes more problems, then it solves, it will not move forward.

**ADNR Dam Safety and Construction Unit and ADG&G Habitat and Area Biologists** must be included in the process from the start.

This is the kind of project that could bankrupt the developer if he is unaware of all the risks it entails.

At a recent meeting on this issue, there was concern expressed that the developer has started dredging. Google Earth has the most current aerial imagery and it shows that the developer has built an access road from a shared residential driveway on N. Pittman Road on the upper west side of the developers property.

The imagery shows that he has not encroached into Mooseybou wetlands. But I don't have any way of confirming my assumption.

Tim Swezey



1210 N Kim Drive, Suite B, Meadow Lakes, Alaska 99623  
Phone: 907-232-2845 - Email: [info@mlccak.org](mailto:info@mlccak.org) - Website: [www.mlccak.org](http://www.mlccak.org)

US Army Corps of Engineers  
Matanuska-Susitna Borough  
Post Office Box 6898  
JBER, Alaska 99506-0898  
[estrella.f.campellone@usace.army.mil](mailto:estrella.f.campellone@usace.army.mil)

January 31, 2024

Re: POA-2023-00398 Proposed seaplane slips on Island Lake in Meadow Lakes

Dear Estrella Campellone:

The Meadow Lakes Community Council membership voted at their January 30, 2024, special meeting to formally oppose the proposed seaplane slips on Island Lake in Meadow Lakes.

The membership's primary concerns were:

1. Impacts from the proposed facility are not possible to mitigate. Material collapsing from the fill areas into the lake would increase turbidity. Fuel and oil spills would add up and contaminate the water and surrounding area. Potential flooding would increase. All of this leads to increased levels of harm to local fish, wildlife, and people.
2. Please keep the existing wetlands. Protecting greenbelts is part of the Meadow Lakes Comprehensive Plan.
3. Fish and wildlife habitat destruction would affect red-necked grebes (on the watch list), sandhill cranes, Arctic turns, swans, loons, and anadromous fish. This is the headwaters of the Little Meadow Creek, a cataloged anadromous waterway. See the Alaska Department of Fish and Game Fish Passage Site 20501067 report for photos of juvenile salmon at the proposed location. <https://www.adfg.alaska.gov/sf/reports/FishPassage/rptSite.cfm?site=20501067&surveyID=1009>

The following topics summarize other concerns stated by the membership.

#### Design

- Members would like to see engineered design plans for the whole project. We don't feel the Corps of Engineers can make an informed decision without more details.
- The runway shown to the south of the slips does not currently exist as depicted in his plans. It exists further to the east. If it were to be extended, the culvert would have to be fish passage. A 12-inch diameter culvert would not be enough.
- The downstream culvert under Pittman Road will be replaced with a fish passage culvert under another project. The expectation is that the number of salmon in Island Lake will increase after replacement of the Pittman Road culvert. This would increase the potential harm caused by the proposed float plane project to a higher number of total fish.
- The lake material is not suitable for dredging and building. It will sluff back into the lake.
- The lake is too small for that amount of activity. Has a study been done to determine if this many planes can function safely on the lake? It is important to preserve the existing recreational uses of the lake and not have it end up like Lake Hood where no non-aviation use is allowed.

- Concern about how fuel and oil will be brought and stored (and cleaned up).
- Flooding if the culvert is too small or becomes blocked.
- Concern about vehicle access and parking. 0.7 acres would be needed for parking (it could be developed on the adjacent lot).
- Increased traffic on Pittman.
- No apparent plans for restrooms.
- Concern this might be a hazard class 2 dam.
- There are several hydrocarbon layers underground in the area (noted by a property owner drilling a well). It would be important to know where these layers are and not disturb them during dredging/construction.

#### Wildlife

- Unavoidable fuel and oil spills at this scale are an incompatible use with the existing wildlife habitat. It only takes a little pollution to kill a little creek and lake.
- Adverse effects on wildlife, especially birds nesting at the lake.
- Adverse effects on salmon, especially juveniles.
- Additional potential for invasive Elodia introduction.

#### Process

- More area residents and the Meadow Lakes Community Council should have received notice of this application.
- The Borough Planning Department and the Borough Fish and Wildlife Commission provided comments and a resolution opposing the project.
- Members were concerned the applicant will not follow the rules and disturb/construct in the wetland and creek without a permit. The applicant has already not applied for a Department of Conservation construction general permit for his clearing of more than 1 acre.

#### Safety and Recreation

- This is already a high-volume aviation traffic area.
- Adverse effects on recreation (kayaking, etc.) on Island Lake.

#### Other available facilities

- There are at least 16 other available facilities in the area. See the Mat-Su Borough Regional Aviation System Plan Study <https://matsugov.us/docs/plans/14341/raspstudy.pdf>.

#### Other

- Many property owners oppose the project.
- Potential reduction of property values.

Thank you for your consideration.

Camden Yehle  
Meadow Lakes Community Council, President





1210 N Kim Drive, Suite B, Meadow Lakes, Alaska 99623  
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Camden Yehle  
Meadow Lakes Community Council, President



# MATANUSKA-SUSITNA BOROUGH

**Planning and Land Use Department**

**Planning Division**

**Fish & Wildlife Commission**

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833

[www.matsugov.us](http://www.matsugov.us)

Estrella Campellone  
Army Corps of Engineers, Regulatory Division, CEPOA-RD  
PO Box 6898  
JBER, Alaska 99506-0898  
[estrella.f.campellone@usace.army.mil](mailto:estrella.f.campellone@usace.army.mil)

Re: Island Lake Float Plane Base application POA-2023-00398

Dear Ms. Campellone,

The Matanuska-Susitna Borough (MSB) Fish and Wildlife Commission (FWC) has reviewed the application, reviewed the anadromous waters catalogue, and heard from several members of the public about this proposed project.

The MSB FWC represents the interests of the Borough in the conservation and allocation of fish, wildlife and habitat. Specifically, the FWC advises borough officials, state or federal agencies and other organizations with interests that may affect conservation of fish, wildlife, and habitat.

The proposed project would dredge and fill wetlands that lay between Island Lake and Little Meadow Creek in order to build float plane docks and access channels to accommodate 31 float planes. The docks would be located at the outlet of Island Lake. Little Meadow Creek is anadromous (AWC # 247-50-10330-2050-3050-4027-5061) downstream of Pittman Road, and fish passage is generally blocked upstream of Pittman Road by a culvert. This culvert is scheduled to be replaced by the MSB in summer 2024, at which point the entire stream and lake will be used by anadromous fish, particularly coho salmon. Coho salmon stocks in the MSB have declined steeply in recent years, and we have heard a good deal of testimony from the public that the decline is impacting the livelihoods of sportfish guides in the Susitna River watershed.

We oppose the project on the following grounds:

- Given the steep declines in coho salmon returns, and the economic impact that has had on multiple sportfish guide businesses and personal use fishing, any project that could cause additional declines in coho should have a mitigation plan. We did not see sufficient mitigation proposed.
  - Island Lake is excellent habitat for salmon and trout. It could be, and according to residents already is, used by salmon. Therefore the entire stream from the lake outlet to Pittman Road already is, or could be in the future, used by anadromous fish. The lake and upper reaches of Little Meadow Creek should be assessed for salmon, and if appropriate nominated to the Anadromous Waters Catalogue and sufficient protections applied before the float plane base permit is considered. If a culvert replacement is necessary for salmon to return in what would have been natural numbers (before Pittman Road was put in) to Island Lake, this should be considered as part of a mitigation plan. If there are other blockages, these should be discussed and worked into a mitigation plan.
  - Island Lake is free from pike, and therefore good habitat for juvenile salmon. Some of the decline in coho stocks is due to pike predation, but Little Meadow Creek appears to be small enough to prevent pike from entering the lake.
  - The project would dredge and fill wetlands that are necessary for an anadromous stream. Wetland mitigation should be applied to the project. Wetlands provide functions of filtering sediment – sediment that could be continually disturbed by float planes using access channels – and in providing habitat and nutrients

for fish and wildlife, including for insects that fish rely on. Removing wetland and riparian vegetation will reduce the habitat and nutrients for salmon.

- Wetlands allow flood waters to infiltrate so that fish habitat downstream is subject to fewer extremes in flood flow (that can scour fish habitat) and low flow (that can lower the oxygen and raise the temperature in streams). Simply routing water through a culvert will not fulfill any of these wetland functions.
- Placing a large number of float planes on the lake will increase the pollution from gas and oil. This will not only increase pollution in the lake, but by removing wetlands, there will be a much smaller wetland area to help filter pollutants from the south end of the lake and the access road before they reach documented coho habitat. The lake could become an impaired water body due to hydrocarbons and low dissolved oxygen. If this were to occur, it would pose a burden on residents and possibly the MSB to design and fund cleanup, which could be aggravated by the continual input of hydrocarbons from a float plane base.
- There does not appear to be any plan to ensure that *Elodea* does not become established in Island Lake and surrounding lakes. *Elodea* is already a large problem that the MSB and partners have been trying to reduce for several years. Float planes transfer *Elodea* when they fly between infested and pristine lakes.
- The wetland area that would be dredged is frequently used by moose. The lake is used by red-necked grebes, loons, and Trumpeter swans. Residents have installed nesting platforms for the grebes, and protection of wildlife and wildlife habitat, including limiting surface uses that disturb wildlife, are components of the MSB-approved Island Lake Management Plan (<https://matsugov.us/28-documents/plans/14033-island-and-doublloon-lakes-lmp>). According to the Alaska Department of Fish & Game (<https://www.adfg.alaska.gov/index.cfm?adfg=wildlifediversity.citizenscience&project=birds-n-bogs&tab=boreal-birds-trouble>):

*A decrease in Loon and Grebe occupancy and productivity on lakes in the Mat-Su area has been documented with data provided by Loon and Grebe Watch volunteers, raising concerns about the stability of these populations and the various pressures facing them. Loons and Grebes are an integral part of wetlands ecosystems and are excellent indicators of environmental quality (clean air, clean water, and adequate open space). Habitat loss, due to the expansion of the human presence in lake areas, and the contamination and pollution of once pristine lakes, are two threats facing Loons and Grebes in Alaska today.*

There does not appear to be any acknowledgement of the Island Lake Management Plan, or how the proposed facility will fit within the plan guidelines.

Lastly, the “Purpose and Need” of the project is in question. According to residents, there are (8) residents with float planes that currently use the lake and numerous seaplane bases within a few miles of the lake, none of which are near documented anadromous streams. According to residents, there are open slips at these and other float plane bases. Some of the bases are located at nearby June Lake (<https://www.airnav.com/airport/66AK>), Visnaw Lake (<https://www.airnav.com/airport/T66>), and Wallis Lake (<https://www.airnav.com/airport/62AK>). A map is attached.

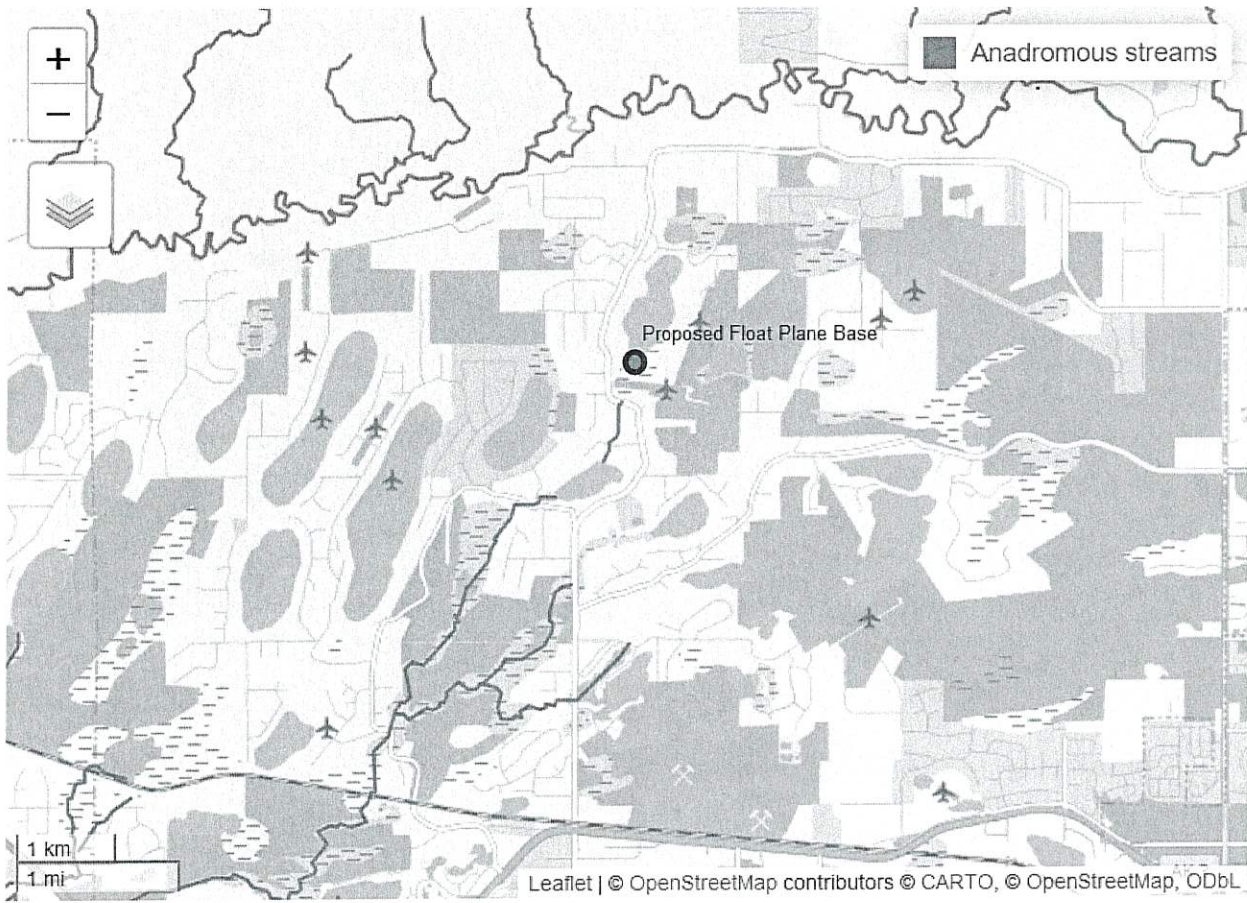
In closing, the FWC would like to see this application denied.

Sincerely,



Andy Couch, Chair  
Mat-Su Borough Fish and Wildlife Commission







# MATANUSKA-SUSITNA BOROUGH

## Planning and Land Use Department

### Planning Division: Wetland POA Review/Comments

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833 • Fax (907) 861-7876

[www.matsugov.us](http://www.matsugov.us) • [planning@matsugov.us](mailto:planning@matsugov.us)

**Waterway:** Little Meadow Creek

**Petitioner/Owner:** Sterling Cook

**Reference Number:** POA-2023-00398

**Nature of Request / Impact Size and Type:** To fill 3.30 acres of palustrine wetlands for access needs to thirty-one floatplane slips. The amount and type of fill was not documented. They are also proposing to dredge 3.11 acres / 13,398 cubic yards of palustrine wetlands to construct floatplane slips.

**Location:** The project site is located within Section 27, T. 18 N., R. 2 W., Seward Meridian; USGS Quad Anchorage C-7; Latitude 61.623021<sup>o</sup> N., Longitude 149.622168<sup>o</sup> W.; Matsu Borough Account Number 57331000L004 (Lot 4-Parcel ID 523619) and Account Number 57331000L003 (Lot 3-Parcel ID 523619), MooseyBou Properties, in Wasilla, Alaska.

**Date/Due Date:** January 15th

**USACE Staff Contact:** Please contact Estrella Campellone at (907) 753-2518, toll free from within Alaska at (800) 478-2712, or by email at [Estrella.f.campellone@usace.army.mil](mailto:Estrella.f.campellone@usace.army.mil) if further information is desired concerning this notice.

**Planner completing this Review:** Kim Sollien

**Case#:**                      **Watershed:** Little Meadow Creek      **Community Council:** Meadow Lakes

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**Staff Comments:** Additional documentation is necessary to understand the cumulative impacts on salmon, the hydrology of Little Meadow Creek, and the community from this proposal prior to USACE's determination. If this permit is granted, the MSB requests full 1-to-1 mitigation for the wetland impacts of this proposal.

The Borough's comments follow the federal "2007 Final Rule" guidance: "The fundamental objective of compensatory mitigation is to offset environmental losses resulting from unavoidable impacts to waters of the United States authorized by Clean Water Act Section 404 permits issued by the U.S. Army Corps of Engineers. Compensatory mitigation enters the analysis only after a proposed project has incorporated all appropriate and practicable means first to avoid and minimize adverse impacts to aquatic resources."

[Compensatory Mitigation | Wetlands | US EPA](#)

The MSB Planning Division generally agrees with avoiding, minimizing, and mitigating unavoidable impacts on wetlands. For the latter, we advocate for a full 1 to 1 mitigation remedy through a USACE-approved program.

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**Avoidance Comments:**

For this development, the avoidance measure is not possible. The 28-acre parcel is comprised of 100% VLD Trough wetlands. The link below is the wetland viewer that documents wetland presence.

<https://www.arcgis.com/apps/webappviewer/index.html?id=15658472427f459ab6d73b1d3ca5ab77>

The application states that the development of thirty-one float plane slips for a new seaplane base will disturb/fill 6.41 acres of wetlands.

The application also states that the float plane slips will be 25 feet wide, by 30 feet long, and (BLANK ) deep. It is unclear how deep the slips will be and how much fill material will be removed. The USACE should document dredge material calculations before completing the evaluation.

The application also states that “excavated peat material that is not used to create access areas would be discharged in uplands.” This parcel contains no uplands. Further clarification from the USACE as to where the fill is going is necessary.

**Minimizing Impacts Comments:**

The application speaks to rerouting Little Meadow Creek to maintain flow. More documentation is needed to understand the design of the reroute and the potential impacts on hydrology. The application states, “To maintain water flows in Meadow Creek, the applicant proposes to reroute a section of Meadow Creek through the seaplane base. Hydrology would be directed through a trench into a 60-foot long by 12-inch diameter culvert under existing runway.” The proposal and rough drawings for the rerouting of Little Meadow Creek are insufficient to understand the need and potential hydrologic and habitat impacts.

Currently, the creek flows naturally from Island Lake through the runway area. If the float plane slips are constructed from dredged and filled wetlands, the creek would maintain its existing meander through the parcel outside the slips. A constructed outlet may be necessary because the development will disturb the existing natural outlet. Additional information is needed to understand the reasons and methods proposed for channeling the creek and placing the culvert under the runway. USACE needs further documentation to clarify the need to reroute the creek under the runway.

Additionally, the Matanuska Susitna Borough has determined that the Little Meadow Creek culvert on North Pittman Road needs to be replaced with a fish passage culvert. It is crucial to investigate whether the 12-inch, 60-foot-long culvert is adequate to support adult and juvenile salmon migration once it is replaced.

Additional documentation is needed to thoroughly understand if this proposed design is appropriate and necessary. And, if so, whether the culvert, as presented, considering the flow volumes of the outfall of Island Lake, is sufficient for the migrating salmon.

**Mitigation Comments:**

The MSB finds the applicant's mitigation proposal to be insufficient. The applicant is proposing NO mitigation. If the permit is approved, Per the 2007 Final Rule, the MSB requests that the applicant fully mitigate any filled wetlands by purchasing full compensatory mitigation credits. These credits should be purchased from a USACE-approved mitigation bank located in the MSB closest to the project impact or an approved In-Lieu Fee Program and using USACE-approved methods for calculating debits and credits to fully mitigate lost wetland services to the Little Meadow Creek watershed.

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**Supporting Recommendations, Comments, and Information:**

The proposed impacted wetlands are crucial in providing essential ecosystem services for MSB residents, fish, and wildlife. Little Meadow Creek is mentioned in ADF&G's anadromous waters catalog for providing an essential habitat for spawning and rearing Coho, Pink, and Chum salmon. It also serves as a migration corridor for Sockeye salmon. Given its anadromy, any alterations to Little Meadow Creek's hydrology and flow volumes from the outlet of Island Lake or the surrounding wetlands may harm salmon production. USACE must document all the impacts from the dredge and fill proposal and the channelization and piping of Little Meadow Creek at the system's headwaters, before making a determination.

A notable gap in the application lies in the absence of a comprehensive Environmental Impact Assessment. Such an assessment should encompass an analysis of potential impacts on local flora and fauna, air and water quality, and the long-term effects on the overall ecosystem. It is crucial to address these concerns to ensure a thorough understanding of the project's environmental implications.

**Tribal Consultation:**

The permit section that speaks to Tribal Consultation lacks the actual consultation information and only defines the concept. The USACE needs to document how the tribes were consulted and the outcome of that consultation.

**Additional Information:**

The application states that the applicant will contact ADF&G and the MSB. Documentation of this needs to be included as part of the decision.

**Cumulative Impacts:** A seaplane base development in the middle of a residential neighborhood may have negative impacts. Use of the lake by existing landowners may be impacted by thirty-one planes taking off and landing. Though not discussed in the application, other infrastructure will need to be developed as part of this project to support the thirty-one slip holders and their access to their aircraft. This should also be a consideration as this permit is evaluated. USACE must seek further clarification on the cumulative impacts of this development prior to making its determination.

**Adopted MSB Plans & Code Supporting Avoiding, Minimizing, and Mitigating Wetland Losses:**



1. [MSB 2012 Wetland Management Plan](#)
2. [MSB Comprehensive Plan 2005 Update](#)
3. [MSB Economic Development Strategic Plan](#)
4. [MSB Title 27 Platting Regulations](#)
5. [MSB Natural Resources Unit Plan](#)
6. [MSB 17.29 Flood Damage Prevention](#)
7. [MSB Ordinance 05-023 called for adopting voluntary BMPs for development around waterbodies](#)

**WATERWAY: Little Meadow Creek**

**Reference Number: POA-2023-00398**

Ø I'm concerned that 31 concentrated seaplane slips, most if not all being rented by non-residents of the Island Lake community will adversely affect the local community's quality of life.

Ø I feel that this development, with the potential of other lakefront property owners following suit, in conjunction with the already established airfields and overfly traffic will present an unsafe aircraft congestion situation over and around Island Lake.

Ø I'm concerned with the quality of life of residents of Island Lake due to the potential increase of sound pollution presented by seaplane activity.

Ø I'm concerned that the permit does not address on-site parking for vehicles and equipment nor entry and egress points and oversight.

Ø The potential adverse effect that this concentration of seaplane activity will have on local water and wetlands fowl has not been considered.

Ø I believe that for the best interest of the community this project should be limited to between 5 and 10 seaplane slips that are directly on Island Lake.

My name is Mark J. O'Brien, the property on the east side of Island Lake is where after 20 over twenty years of service to this country fighting in both World War 2 and the Korean War with several citations for bravery, including the Silver Star, my Uncle U.S. Army MAJ(R) John Gannon was afforded the opportunity to homestead. He and his wife Elizabeth Gannon looked forward to enjoying Alaska and the community that it provided. My father John O'Brien moved to Alaska in the early 1970s and his growing family my 5 siblings and I soon were also able were able to enjoy that same Alaska spending time on our Aunt and Uncle's homestead and the general area around Island Lake. As time has gone on and my Uncle and Aunt have left us the home stead has passed to my father but it has still provided that same location of solace for our family. Specifically, for me that solace has come in a location I was able to bring my children during my many years of service in the U.S. Army, especially when coming home from R and R while on combat tours. It is a place we love visiting and spending time as my children enjoy with their grandfather what I hope to enjoy with my grandchildren. Part of that Alaska charm is the Bush Planes that are part of everyday life, I love the fact we can fly into our homestead on our airstrip and have even had friends and family enjoy float plane rides off the lake itself. But those flights and those like it are from people who live there and are part of the charm of living on the lake. I am very pro-aviation; it is part of the spirit of Alaska and my family. My father and

neighbor have kept the airstrip on our property within FAA standards and have used it for their own commercial interests but it has never and will never be at the expense of the rest of our community around Island Lake.

If you allow for essentially the lake to be turned into a commercial aerodrome you take that away from those of us who have such deep roots there. It doesn't appear Mr. Cook has those roots as his address listed is several miles away and he will not have the impacts on his residence the way the rest of us will. Anyone who rents one of those slips will also not deal with the effects of the addition of these additional 31 aircraft taking off and landing 400 feet from their homes. Mr. Cook also doesn't address the issues of arriving and parking at his proposed site. The turnoff of Pittman Road to Mooseybou is barely adequate to handle the traffic from the two residential properties that use it already and the land adjacent to its width does not allow for parking. So those of us who do need to use that area could be severely impacted by someone trying to use our backyard for his commercial gain. On the chance someone completely obstructs the area how long would we have to wait to get to our home as the Alaska State Troopers in the area are already stretched thin and really should be doing more important things than parking control for a commercial interest that is ill planned and considered when it comes to those who live around the area.

Additionally, from what I saw in the paperwork I did not see an assessment from the Federal Aviation Administration (FAA) about the increase in aerial traffic it would have on the already established certified runways, such as Hess Airfield, FAA, 7AK8. By allowing a floatplane facility you are creating a second airstrip controlled by two separate parties less than 1000 feet apart. While I know the Corps of Engineers extent of concern is the navigable water it seems that in this case the FAA should be consulted about the potential effects specifically in an area that is not controlled by an Air Traffic Control Tower in the immediate area. This has the potential for a disaster based on the increased air traffic which hopefully the FAA consulted with before a decision is made on this.

Fish and Wildlife consider Island Lake a "dead lake" regarding sport fishing. This does a disservice to the actual importance of the lake regarding the migratory birds that make their summer homes on the lake. The Arctic Terns have a nesting colony on the island located at the western end of Island Lake. This island has been referred to as Tern Island by many living in the area. The colony today is a mere shadow of what it was during the 1960s and 70s. Tern Island, in the center of Island Lake, is approximately 900 feet from where the main channel of the seaplane base, planes will have to taxi past the island to a suitable location for take-off and landing when returning to the base and going will have an unfavorable effect on the Tern population with an addition of 31 planes taking off and landing. This may also induce the end of the Common Loon being present at Island Lake. In the 60s and 70s, the lake hosted 2 breeding pairs of loons on the lake, one at each end. It was also an important stop to gather during their southern migration. Now only a few single loons are observed each summer. It would be nice to see the loons return, but a high concentration of seaplane activity in one area of the lake is concerning for this expectation. In recent years Trumper Swans have started making a regular appearance at Island Lake. This past August I observed 5 swans swimming near mid-lake. Due to their socialization with humans, they swam to the bank as I stood observing them. Their welfare should be considered. They are large fowl and have a high tolerance for human contact. The number of

migratory duck species that live and nest on Island Lake is large. I see the biggest issue about ducks is that they nest directly above the waterline of the lake. Boat and seaplane wakes may lift the eggs from the nest and drown them in the lake. There is empirical evidence of this in that I observed ducklings of the same species in separate paddling (a group of duckling with parent) of easily observable different sizes. I've been informed that if a duck loses her clutch, she will lay an additional one. Unfortunately, time is not on their side as they all must migrate at about the same time and size does make a difference. The Sandhill Cranes, in past years have been observed passing through the area but in the last few years they are using the Island Lake, Little Lake (aka Hess Lake) area as a nesting range. For the last few years, I've observed one or two breeding pairs raising their one or two chicks in the area. Charlie Center and I have started delaying any grass cutting activity on Gannon's Landing and the Hess airfield and aprons until after the chicks have fledged. The tall grass is a prime foraging and hiding area for the chicks. Unfortunately, the area of the proposed seaplane base is also a prime area for the raising of the chicks. Additionally, if a driveway is constructed off the MooseyBou St. right-of-way to an adjoining parking area this will remove more foraging area.

If Mr. Cook is allowed to develop a 5 to 10 slip development that is reasonable but 31 slips is absolutely unacceptable for the reasons I have lined out. I'm not anti-aviation or anti-development. My concerns are the sheer size and location of this development, the destruction of the wetlands by both the channel and slip building in conjunction with the need for parking facilities and access roads. This development is too large for the area concerned and the high concentration of aircraft in one area is unsafe. If this development goes forward it should be downsized and limited to the shoreline abutting the lake. This would help to keep the Island Lake community a real community and not a hub for seaplane rental space with no connection to the Land. The fact that Mr. Cook doesn't live in the area and made no attempt to reach out to the rest of us shows us the level of concern and attention he will provide if there are any issues with his enterprise.



## REGION 10

SEATTLE, WA 98101

January 31, 2024

Ms. Estrella Campellone  
Regulatory Division  
CEPOA-RD  
Post Office Box 6898  
JBER, Alaska 99506-0898

Dear Ms. Campellone:

The U.S. Environmental Protection Agency has reviewed the U.S. Army Corps of Engineers (Corps) revised Public Notice (PN) POA-2023-00398 Little Meadow Creek, dated December 15, 2023, for compliance with the restrictions on discharge contained in the Clean Water Act Section 404(b)(1) Guidelines (Guidelines).<sup>1</sup> The Public Notice describes the proposed work is to construct a seaplane base by building 31 floatplane slips, each 25-foot wide by 30-feet long deep. Each floatplane slip would be connected to Island Lake through three (3) 75-foot-wide access channels and one (1) 150-foot-wide main channel. The PN further states that, to maintain water flows in Meadow Creek, the applicant proposes to reroute a section of Little Meadow Creek through the seaplane base. According to the PN, hydrology would be directed through a trench into a 60-foot long by 12-inch diameter culvert under existing runway. The proposed project would require the excavation of 13,398 cubic yards of organics from 3.11 acres of palustrine wetlands to create the seaplane base basin and filling and/or modifying at most 3.30 acres of palustrine wetlands around the excavated area to provide access and operate seaplane base activities.

The EPA is providing the following comments pursuant to our authorities under CWA Section 404 to assist in achieving compliance with Guidelines. The Guidelines are the substantive environmental criteria for the evaluation of proposed discharges of dredged or fill material, which cannot be permitted unless compliance with the Guidelines has been demonstrated.

Based on the information available in the PN, the Corps project application and application drawings, the EPA has determined that the proposed discharges do not comply with the Guidelines. Specifically, it is not clear based on the information provided that the proposed discharge represents the least environmentally damaging practicable alternative (LEDPA) to achieve the project purpose or that all appropriate and practicable steps will be taken to avoid, minimize, and compensate for remaining unavoidable impacts to aquatic resources, consistent with 40 CFR § 230.10(a) and (d) of the Guidelines. EPA's detailed comments are contained in the enclosure.

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<sup>1</sup> 40 C.F.R. Part 230.

In addition, the project proposal does not appear to be consistent with the Matanuska-Susitna Borough Planning Department's Island and Doubloon Lakes Lake Management Plan (adopted 1996) developed by the local property owners and residents.

EPA appreciates the opportunity to provide comments on the proposed project. We look forward to working with the Corps as necessary to address the issues raised in this letter. Should you have any questions or require further information, please do not hesitate to contact me at (206) 553-0285 or by email at [jensen.amy@epa.gov](mailto:jensen.amy@epa.gov) or Betsy McCracken at (907) 271-1206 or by email at [mccracken.betsy@epa.gov](mailto:mccracken.betsy@epa.gov).

Sincerely,

*David Croxton*

David Croxton, Manager  
Wetlands and Oceans Section

ENCLOSURE

1. Comments Related to Clean Water Act Section 404(b)(1) Guidelines for Public Notice POA-2023-00398

cc:

[regpagemaster@usace.army.mil](mailto:regpagemaster@usace.army.mil)

Mr. Sterling Cook, Applicant, [sscook78@yahoo.com](mailto:sscook78@yahoo.com)

Ms. Sarah Meyers, ADF&G, Habitat Section, [Sarah.Meyers@alaska.gov](mailto:Sarah.Meyers@alaska.gov)

Matanuska-Susitna Borough Planning Department, [kim.sollien@matsugov.us](mailto:kim.sollien@matsugov.us)

Meadow Lakes Community Council, President, [CamdenYehle@gmail.com](mailto:CamdenYehle@gmail.com)

**Enclosure – Comments Related to Clean Water Act Section 404(b)(1) Guidelines for Public Notice**  
**POA-2023-00398**

The following are detailed comments submitted by the U.S. Environmental Protection Agency in response to the U.S. Army Corps of Engineers (Corps) Public Notice POA-2023-00398, applied for by Mr. Sterling Cook. In addition to the PN, we have reviewed the Application materials<sup>2</sup> submitted to the Corps.

**I. Comments Related to Clean Water Act Section 404(b)(1) Guidelines**

As referenced in the cover letter, the CWA Section 404(b)(1) Guidelines (Guidelines)<sup>3</sup> are the substantive environmental criteria for the evaluation of proposed discharges of dredged or fill material into waters of the United States, including wetlands. Compliance with the Guidelines must be demonstrated before proposed discharges of dredged or fill material may be permitted. The Guidelines specify that a proposed discharge is considered noncompliant if the application contains insufficient information to determine compliance.<sup>4</sup>

Based on the information available in the Little Meadow Creek (Project) PN, the application and associated drawings the proposed discharges would not comply with the Guidelines. The following comments include recommendations for how the Corps' record for this project can be improved to demonstrate compliance with the Guidelines.<sup>5</sup>

**A. Restrictions on Discharge: Least Environmentally Damaging Practicable Alternative<sup>6</sup>**

The Guidelines at 40 CFR § 230.10 identify several specific restrictions on discharges. The first of these, at 40 CFR § 230.10(a), specifies that, “no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences.”

An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of the overall project purposes.<sup>7</sup> Where the activity associated with a discharge is not “water dependent,” practicable alternatives that do not involve a discharge to wetlands and other special aquatic sites “...are presumed to be available, unless clearly demonstrated otherwise.”<sup>8</sup> Special aquatic sites are defined in the Guidelines to include sanctuaries and refuges, wetlands, mud flats, and vegetative shallows.<sup>9</sup>

Once practicable alternatives are determined for a proposed discharge, only the Least Environmentally Damaging Practicable Alternative (LEDPA) may be authorized. Once the LEDPA has been identified, that

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<sup>2</sup> Cook, S.S. August 21, 2023. Application for Department of the Army Permit, Island Lake float Plane base.

<sup>3</sup> 40 C.F.R. Part 230.

<sup>4</sup> 40 C.F.R. § 230.12(a)(3)(iv).

<sup>5</sup> 40 C.F.R. § 230.6(b); 40 C.F.R. § 230.11; and 40 C.F.R. § 230.12(b).

<sup>6</sup> 40 C.F.R. § 230.10(a).

<sup>7</sup> 40 C.F.R. § 230.10(a)(2).

<sup>8</sup> 40 C.F.R. § 230.10(a)(3).

<sup>9</sup> 40 CFR Part 230.40.

is the version of the project which is evaluated against the other restrictions on discharge found in subsections § 230.10(b), (c), and (d).

The Public Notice indicates the proposed work is to construct a seaplane base by building 31 floatplane slips, each 25-foot wide by 30-feet long deep. Each floatplane slip would be connected to Island Lake through three (3) 75-foot-wide access channels and one (1) 150-foot-wide main channel. The PN further states that, to maintain water flows in Meadow Creek, the applicant proposes to reroute a section of Little Meadow Creek through the seaplane base. According to the PN, hydrology would be directed through a trench into a 60-foot long by 12-inch diameter culvert under existing runway. The proposed project would require the excavation of 13,398 cubic yards of organics from 3.11 acres of palustrine wetlands to create the seaplane base basin and filling and/or modifying at most 3.30 acres of palustrine wetlands around the excavated area to provide access and operate seaplane base activities. In addition to these direct impacts to the wetland from the excavation and fill discharge to establish the 31 floatplane slips, the Guidelines require an assessment of secondary impacts associated with use of the floatplane facility.

The EPA is concerned that all practicable alternatives have not been evaluated in sufficient detail to conclude this project meets 40 CFR § 230.10(a). Available information indicates that the proposed project is not the LEDPA and should not be authorized given the availability of other practicable alternatives located outside of wetlands. The following comments highlight information relevant to the LEDPA analysis that we request the Corps consider in making a permit decision.

Based on our review of the available information, the EPA believes the project would not be considered water dependent, and practicable alternatives that do not involve a discharge to WOTUS seem to be available in the area. While floatplanes require access to a water body of sufficient depth and length to allow for safe operations commensurate with the capabilities of the specific aircraft (e.g., distance necessary for safe takeoffs and landings), slips for floatplanes are not required to be sited in wetlands. It is not necessary to excavate or fill wetlands to provide floatplane access or establish slips. Practicable alternatives exist which do not involve a discharge to a special aquatic site (e.g., wetlands), and which would demonstrably have less adverse effect on the aquatic ecosystem.

Floatplane access to the water body and access to floatplane slips can be (and generally is) provided via uplands, which can best accommodate the necessary vehicle traffic and parking, loading and unloading, fueling and minor maintenance activities associated with use of the aircraft. Individual slips can readily be established by docks or even excavated in upland shorelines.

The applicant's proposal to establish the floatplane facility in a wetland seems poorly suited to the purpose and would result in greater aquatic resource impacts relative to practicable alternatives that do not involve a discharge to a special aquatic site.

Because the project purpose is not a water-dependent activity, it is assumed that alternatives exist that do not involve discharge to wetlands unless clearly demonstrated otherwise. Note that property ownership does not eliminate the option of locating the project in a different location if that location is practicable for achieving the same project purpose. Therefore, EPA recommends the applicant provide a detailed project need and purpose statement and thorough alternatives analysis. Once practicable alternatives are determined for a proposed discharge, only the LEDPA may be authorized.



To ensure compliance with the alternatives analysis requirements within the Guidelines, we recommend the Corps work with the applicant to fully evaluate all practicable alternatives to reduce impacts to the aquatic environment. The LEDPA should be determined based on an evaluation of the combination of alternative sites or configurations within a site with a site design that meets the stated needs and provides the least impacts to waters of the U.S. The applicant needs to provide additional information to demonstrate that the proposed location and configuration, once combined with appropriate and practicable avoidance and minimization measures, is the LEDPA.

The project proposal to create a seaplane base basin also does not appear to be compatible with the Island and Doubloon Lakes Lake Management Plan<sup>10</sup> (Plan) adopted by the Matanuska-Susitna Borough (MSB) in 1996. The goals identified in Section 3 of the Plan are part of Borough code. The goals address water quality, recreation and residential character, wildlife, and access.

Several goals of the Plan are relevant to the proposed project, including the intent “to maintain or improve the lake’s water quality” (p. 11). Also, that “Upland development should occur in an appropriate manner to ensure that pollution, noise, or other environmental degradation of the lake and uplands does not take place” (p. 11). Also, that “Use of the lake should be compatible or enhance the present character of the lakes which is of low-impact, quiet recreational character” (p. 11). Lastly, that “The ability of Island and Doubloon lakes to remain a migratory bird (I.e., loons, Sandhill cranes and red-necked grebes) nesting sites should be preserved. Recreational use of the lake should be compatible with wildlife nesting” (p. 12). Resident fish species currently documented in the Alaska Department of Fish and Game (ADF&G) Alaska Freshwater Fish Inventory (AFFI)<sup>11</sup> database include stickleback, which are an important prey species for local waterbirds, including loons, swans and grebes.

The Plan states that residents of the area consider certain uses incompatible because they harass wildlife, create turbid water conditions and cause lake shoreline erosion. The Plan also notes zoning regulations for development activities including setback requirements that may be applicable to the seaplane base basin development proposal.

The aircraft storage and use would result in the specific impacts that the Plan was adopted to prevent. In addition to eliminating wildlife habitat in the project footprint, the proposed storage and use of the aircraft would reduce habitat quality beyond the direct footprint due to disturbance and reduce habitat quality in the lake due to the increased traffic and associated noise. The migratory bird species the Plan seeks to protect would likely be impacted. The traffic and noise would also impact the “quiet recreational character” of the lake. The proposed project could also result in spills and leaks of aviation fuel, oil, and other pollutants.

A potential secondary impact not considered in the Plan is the potential for floatplane traffic to spread elodea (*Elodea canadensis*, *Elodea nuttallii*, and their hybrid). Elodea is the only submerged aquatic

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<sup>10</sup> Island and Doubloon Lakes Lake Management Plan. Adopted August 1996. Matanuska-Susitna Borough Planning Department. <https://matsugov.us/docs/general/14033/islandanddoubloonlakeslmp.pdf>

<sup>11</sup> Alaska Fish Resource Monitor- Alaska Freshwater Fish Inventory (AFFI) database [Internet]. 1973-. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish (cited January 31, 2024). Available from: <https://adfg.maps.arcgis.com/apps/MapSeries/index.html?appid=a05883caa7ef4f7ba17c99274f2c198f>

invasive plant documented in Alaska to date.<sup>12</sup> It can spread from plant fragments and negatively impact aquatic ecosystems where it becomes established. Infestations have been documented at remote lakes in the Matanuska-Susitna Borough where floatplanes were the likely vector.

#### B. Information lacking relating to aquatic resource impact minimization

The PN proposes to “construct a seaplane base by building 31 floatplane slips, each 25-foot wide by 30-foot long deep” (p. 2). Each floatplane slip is proposed to be connected to Island Lake through three 75-foot-wide access channels and one 150-foot-wide main channel. The PN states that the proposed project would require: 1) the excavation of 13,398 cubic yards of organics from 3.11 acres of palustrine wetlands to create the seaplane base and; 2) filling and/or modifying 3.30 acres of palustrine wetlands around the excavated area to provide access and operate seaplane base activities.

The PN does not provide sufficient information to understand where or how the proposed fill would be dredged and placed to create the slips, or how wetlands might be “modified.” The PN does not provide information on what the “seaplane base activities” might be or if dock construction is part of the project design. This information is needed to quantify potential impacts and to identify the project LEDPA. The EPA recommends that this information be provided, wetland and lake resource impacts be quantified and the LEDPA be identified prior to any permit issuance.

The PN states that the project would relieve the current demand for floatplane slips on local lakes that support anadromous fish species, which are already congested with recreational boat traffic. The ADF&G AWC<sup>13</sup>/AFFI<sup>14</sup>/Fish passage culvert<sup>15</sup> databases between Island Lake and the inlet stream to Cloudy Lake (AWC Stream # 247-50-10330-2050-3050-4027-5061) documents the upper extent of Coho Salmon rearing 50-feet upstream of the culvert on North Pittman Road. A recent nomination for adult Coho Salmon in Island Lake is pending ADF&G approval. Based on the ADF&G fish passage culvert database,<sup>14</sup> there are at least two culverts (one on North Pittman Road and one on East Norms Road) that are impeding/limiting fish passage up into Island Lake. According to the Alaska Department of Transportation and Public Facilities (ADOT&PF),<sup>16</sup> the culvert under North Pittman Road is scheduled to be replaced in the summer of 2026 as part of DOT project number 0001752/CFHY00926, Pittman Road shoulder widening and slope flattening. It is reasonable to predict that the replacement of this culvert will provide improved fish passage into Island Lake, including the wetlands.

The PN further proposes to reroute a section of “Meadow Creek” through the seaplane base to maintain downstream waterflow into the lower reaches of Little Meadow Creek and Cloudy Lake

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<sup>12</sup> USFWS, 2020. Programmatic Environmental Assessment of the U.S. Fish and Wildlife Service management Strategy for Elodea and Other Submersed Aquatic Invasive Plants in the Alaska Region.

<sup>13</sup> Giefer, J., and S. Graziano. 2023. Catalog of waters important for spawning, rearing, or migration of anadromous fishes – Southcentral Region, effective June 15, 2023, Alaska Department of Fish and Game, Special Publication No. 23-03, Anchorage. Available from: [https://www.adfg.alaska.gov/static-sf/AWC/PDFs/2023scn\\_CATALOG.pdf](https://www.adfg.alaska.gov/static-sf/AWC/PDFs/2023scn_CATALOG.pdf)

<sup>14</sup> Alaska Fish Resource Monitor- Alaska Freshwater Fish Inventory (AFFI) database [Internet]. 1973-. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish (cited January 31, 2024). Available from: <https://adfg.maps.arcgis.com/apps/MapSeries/index.html?appid=a05883caa7ef4f7ba17c99274f2c198f>

<sup>15</sup> Alaska Fish Passage Culvert database [Internet]. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish (cited January 31, 2024). Available from: <https://experience.arcgis.com/experience/1a4eb07b42ff4ebb8c71ba45adaedf0c/page/Fish-Passage/>

<sup>16</sup> ADOT&PF Mat-Su Transportation Fair, January 25, 2024, Palmer Fairgrounds, Palmer, Alaska. <https://www.mat-su-transportation-fair.com/>

located downstream. The PN states that hydrology would be directed through a trench into a 60-foot long by 12-inch diameter culvert under an existing runway (in forested/shrub wetland) and connected to the Cloudy Lake inlet stream.

Based on the available information it is unclear how the project would achieve water flows from Island Lake to move freely through the seaplane basin into Little Meadow Creek's lower reaches via the Cloudy Lake Inlet. The PN, application and drawings do not include any hydrologic data, plans or engineered design specifications describing how the wetland hydrology would be altered to create the floatplane slips or to create a trench that connects to the 60-foot long by 12-inch diameter culvert. The PN also does not include any information about how the "culvert under the existing runway" would be connected to Little Meadow Creek, (i.e., the outlet stream of Island Lake and the inlet stream of Cloudy Lake). The EPA recommends that this information be provided, wetland and lake resource impacts be quantified and the LEDPA be identified prior to a permit issuance. The EPA recommends that once a LEDPA is identified, that the Corps condition the proposed project to improve fish passage and stream function and not result in the further loss of wetland and lake function and connectivity.

### C. Restrictions on Discharge: Minimizing Impacts and the Mitigation Sequence

The Guidelines at 40 CFR § 230.10(d) require that no discharge of dredged or fill material is permitted unless appropriate and practicable steps have been taken to minimize potential adverse effects to the aquatic ecosystem. Demonstrating compliance with 230.10(d) requires identifying the appropriate and practicable steps that will be taken to avoid impacts, and then minimize and compensate for any remaining unavoidable impacts associated with discharges subject to the Guidelines. Taken together, these steps form the mitigation sequence: a mandatory, sequential process undertaken to minimize potential adverse impacts of the discharge on the aquatic ecosystem.

The PN contains the required mitigation statement describing how impacts to waters of the United States are to be avoided and minimized, but it is still unclear whether the proposed discharge includes all appropriate and practicable steps to minimize potential adverse impacts. For example, the PN does not explain how the dimensions of the excavated basin were determined. The PN does not indicate that the proposed "150-foot-wide main channel" is the minimum necessary to provide floatplane access to and from the lake. The PN does not state if the proposed fill is necessary to provide access to the slips or describe how the excavated peat is suitable material to use as fill and provide access. It is not clear from the project materials if the wetland surface is capable of supporting the proposed fill material. It does not appear that the applicant has considered how boardwalks or docks may provide equal access with fewer impacts.

It is not clear how the peat can be excavated to create the slips and channels with near-vertical banks (as indicated in the drawing in the PN) and support fill. A more likely outcome is soft banks at a shallow angle of repose that may or may not provide easy access to the aircraft. The applicant's minimization statement indicates that "All construction and excavation work would take place in winter, while peat is frozen." While the surface of the wetland may be frozen (and snow cover can be compacted) to allow the operation of equipment, it is unlikely that the peat will be frozen to the proposed 3–4-foot depth of excavation. Peat is difficult to excavate cleanly, whether frozen or not.

It is also not clear how rerouting Little Meadow Creek and placing it in a 12-inch diameter culvert under the runway is a minimization measure, or even why it is part of the current proposal. If the runway was

previously authorized by the Corps and ADF&G, no doubt those permits prohibited interfering with the existing drainage patterns. If the runway is blocking Little Meadow Creek, that should be addressed in the context of the previous permits. However, the best remedy would be to construct a suitable crossing at the current channel location rather than forcing a new alignment.

#### D. Compensatory Mitigation

Pursuant to 33 CFR § 325.1(d)(7), applications for discharges of dredged or fill material into waters of the United States must include a statement describing how impacts to waters of the United States are to be avoided and minimized, as well as either a statement describing how impacts are to be compensated for or a statement explaining why compensatory mitigation should not be required for the proposed impacts. Pursuant to 40 CFR § 230.94(b)(1), the PN must contain the applicant's mitigation statement, including the amount, type, and location of any proposed compensatory mitigation, including any out-of-kind compensation, or indicate an intention to use an approved mitigation bank or in-lieu fee program.

The Guidelines identify that "Compensatory mitigation requirements must be commensurate with the amount and type of impact that is associated with a particular DA permit."<sup>17</sup> They also identify that: "the amount of required compensatory mitigation must be, to the extent practicable, sufficient to replace lost aquatic resource functions. If a functional or condition assessment or other suitable metric is not used, a minimum one-to-one acreage or linear foot compensation ratio must be used."<sup>18</sup> This requirement indicates that functional or condition assessments should be used to quantify the functional loss anticipated to result from the proposed discharge. To the extent that such losses can be quantified, compensation should offset functional impacts from both direct and secondary impacts.

The applicant's mitigation statement does not describe how remaining impacts would be compensated for or explain why compensation should not be required. The PN states only that "no compensatory mitigation is proposed" (p. 2). The applicant's mitigation statement does not clearly demonstrate that it would be impracticable to fully compensate for the functional impacts associated with the proposed project. As such, the proposed discharge cannot be specified as complying with the requirements of these Guidelines, because it does not include "appropriate and practicable discharge conditions (see subparts H and J) to minimize pollution or adverse effects to the affected aquatic ecosystems."<sup>19</sup>

The drawings in the PN indicate that the proposed project would eliminate or reduce all wetland function north of the runway. Compensatory mitigation would be necessary to fully offset the functional losses. EPA believes compensatory mitigation is practicable to provide for the proposed impacts and therefore is required for the discharges to comply with 40 CFR § 230.10(d). The project site is located within the service areas of four mitigation banks and one in-lieu fee program that may have appropriate (i.e., stream and wetland) credits to offset impacts from the proposed seaplane base and associated activities. Information about third-party compensation providers and available credits can be found on the RIBITS<sup>20</sup> website (filtered for Alaska District).

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<sup>17</sup> 40 CFR § 230.93(a)(1).

<sup>18</sup> 40 CFR § 230.93(f)(1).

<sup>19</sup> 40 CFR § 230.12(a)(2).

<sup>20</sup> U.S. Army Corps of Engineers. Regulatory In-Lieu Fee and Bank Information Tracking System (RIBITS). Available at: <https://ribits.ops.usace.army.mil/ords/f?p=107:2:11551071587553::NO::>

We reiterate, however, that we believe the Guidelines preclude authorization of the proposed discharge because the proposal has not demonstrated that it represents the LEDPA, because other practicable and less impactful alternatives exist that have not been considered, and because the proposal does not include all practicable minimization measures to offset impacts to aquatic resources, including special aquatic sites.

## **To whom it may concern,**

I am writing this letter to state how highly disappointed I am with the project as well as person proposing it for more reasons than I can count. From what I understand Sterling Cook is proposing a project on Island Lake of 31 float plane slips that in my opinion is strictly for the financial benefit of himself and will turn mine as well as other dream homes into a nightmare living on a small Lake Hood. I understand is making many residents of the lake as well as around it quite unhappy. This is unfortunate for many reasons some of which I am stating now. As his direct neighbor the burning of tires that he started with after clear some of this property immediately concerned me as my 80 year old mother with cancer is the neighbor right next door. There were so many tires burned here that it relit itself numerous times in the dead of winter which I have video and pictures of. This indicates a caricature with total disregard for others in my opinion.

1. This will displace all of the water fowl which nest in the wet lands and scare away the rest of the wild life we've been so lucky to witness every year (swans,sand cranes,terns,loons,ducks,eagles,ravens,moose,fox,coyotes and some species I'm not even sure of)
2. It will make all of the water sports like paddle boarding, canoeing,swimming,boating and possible fishing in the future a hazard to as DNR was just on the lake a couple of years ago
3. I am EXTREMELY concerned about water quality for both the animals and people as well as the noise it will create for both the residents that live on the lake and around it as they will have absolutely no gain in from this project. The regulations that will be attached to this project also give me concern. From what I understand this project was not handled correctly from the start of the one proposing it and if it had the actual residents/tax payers of Island Lake would have disapproved immediately.



## **WATERWAY: Little Meadow Creek**

**Reference Number: POA-2023-00398**

### **Initial Concerns**

- 31 concentrated seaplane slips, most if not all being rented by non-residents of the Island Lake community will adversely affect the local community's quality of life.
- This development, along with the other potential lakefront property owners following suit, and in conjunction with the already established airfields and overfly traffic will present an unsafe aircraft congestion situation over and around Island Lake.
- The quality of life of residents of Island Lake due to the exponential increase in noise pollution that will be inevitable with the incredible surge in seaplane activity that will result from this project.
- This permit does not address on-site parking for vehicles and equipment nor entry and egress points and oversight. Which means an increase in traffic accidents with potentially dozens of vehicles parked on the road.
- The potential adverse effect that this concentration of seaplane activity will have on local water and wetlands fowl has not been considered.
- It is in the best interest of the community to limit this project to between 5 and 10 seaplane slips that are directly on Island Lake.

My name is Shane O'Brien. My great-uncle and aunt bought our property on the east side of Island Lake in the early 1960s. I spent a good part of my life working to improve that land under the guidance of my father, John O'Brien. My Uncle was a military aviator and obtained the Island Lake property with the intention of developing an airfield and seaplane operation. The runway was built but unfortunately the ravages of war, a life spent helping others and age brought his dreams to a close before fruition. My Aunt left the remaining land of the original homestead to my father in May of 2002.

My Dad and I built a home on the property, kept the improvements repaired and continued my great-uncle's dream. We are presently in the process of constructing an aircraft hangar on Gannon's Landing, FAA, AK83 airfield. We are a pro-aviation family. However, I am opposed to this seaplane development, particularly with the size, 31 slips, and the lack of infrastructure to support this size of a seaplane base.

I'm extremely concerned as to the effects on the quality of life of the Island Lake residents. Basing an additional 31 aircraft on the lake is a huge increase in the aviation usage of the lake. Additionally, the pilots of these aircraft will have little or no ties to the community of Island Lake and may well feel no obligation to be "good neighbors" as they don't live in or have any personal investment in the welfare and history of the neighborhood.

The addition of 31 seaplanes using Island Lake strikes me as a poorly manifested plan with a huge potential for accidents and destruction of habitat. I do not know how many active seaplanes presently resident on Island Lake during the summer months, but I do know that in the last 5 years that number has increased by a noticeable amount. Most of these aircraft are owned by residents or the aircraft owner is renting moorage directly from a landowner. An additional 31 aircraft and their owners who will not have this attachment to the Island Lake community is worrisome for a lake that is clearly not large enough to handle that much traffic.

The permit application makes only one reference to other airfields in the area, and this is only in reference to water flow. That airfield is Hess Airfield, FAA, 7AK8. Gannon's Landing airfield lies due east of Island Lake about 1000 feet from the centerline of the lake. It also stretches the length of the lake. There is a taxiway connecting Gannon's Landing to Hess Airfield. This taxiway is 1000 feet from the proposed site of the seaplane base. Directly west of the proposed site by 3500 feet is another airfield. The concentration of small aircraft on and above Island Lake is already high. Thirty-one additional aircraft making takeoffs and landing on the lake is dangerous. The opportunity for an aircraft mishap will be exponentially increased.

Sea planes are very loud. The effects of sound over water are enhanced. This potential for noise makes the addition of this many aircraft a concern. Our home is 400 feet off the shore of the lake screened by a stand of mature birch and spruce. At present when a seaplane takes off the engine noise is loud enough that conversation on my lake facing desk must stop. 31 more aircraft coming on and off the lake all summer will pretty much render the deck unusable during daylight hours.

There are 33 plots of land with shoreline on Island Lake, most can accommodate only one seaplane dock or slip. A number could accommodate more, but the owners have chosen not to do so. Mr. Cook appears to own two of the 33 lots which he is using for this development. This development could potentially double the seaplanes operating off Island Lake with no regard for development by other landowners. I favor development but not this dense of a development in one small part of the Island Lake shoreline. Smaller developments on other lots abutting the lake with more direct contact between the community and the aircraft owners will facilitate a more even and responsible development of seaplanes on Island Lake.

I have no issue with Mr. Cook embarking on a 5 to 10 slip development, but 31 slips is beyond the pale and a totally unacceptable impact to the wildlife that live on the lake and the neighborhood that surrounds it.

Yet another concern is that the plan documents do not appear to allow for a parking area for private vehicles or support equipment. I'm also at a loss from the permit documents to understand the planned access and egress from Pittman Rd. The MooseyBou St. right-of-way off Pittman Rd. contacts the southeast corner of this development so it is a possible point of access. If adequate on-site parking is not provided the MooseyBou right-of-way will become a de facto parking lot. Without strict parking control this will be disadvantageous to my family as



MooseyBou St. makes up the first 700 feet of the access easement and road that my family has held since May of 1963. I could easily find myself unable to have large vehicles or heavy equipment to gain access to my property if parking occurred on both sides of MooseyBou. It should also be noted that there are other plots of land that use MooseyBou as their access who could suffer the same issue. Given the nature of the property, this will undoubtedly result in confrontation and conflict.

I understand that Fish and Wildlife consider Island Lake a “dead lake” with regards to sport fishing. This does a disservice to the actual importance of the lake with regards to the migratory birds that make their summer homes on the lake.

The Arctic Terns have a nesting colony on the island located at the western end of Island Lake. This island has been referred to as Tern Island by many living in the area. The colony today is a mere shadow of what it was during the 1960s and 70s..

Tern Island is approximately 900 feet from where the main channel of the seaplane base will enter Island Lake. Planes will have to taxi past the island to a suitable location for take-off and landing when returning to the base. 31 aircraft coming and going will most likely devastate the remaining Tern population.

The Common Loon has nearly disappeared from Island Lake. In the 60s and 70s the lake hosted 2 breeding pairs of loons on the lake, one at each end. It was also an important stop to gather during their southern migration. Now only a few single loons are observed each summer. It would be nice to see the loons return, but a high concentration of seaplane activity in one area of the lake is concerning for this expectation and again, will most likely result in a total destruction of the habitat.

In recent years Trumpeter Swans have started making a regular appearance at Island Lake. This past August I observed 5 swans swimming near mid-lake. Due to their socialization with humans they swam to the bank as I stood observing them. Their welfare should be considered.

The number of migratory duck species that live and nest on Island Lake is large. I see the biggest issue with regard to ducks is that they nest directly above the waterline of the lake. Boat and seaplane wakes will lift the eggs from the nest and drown them in the lake. There is empirical evidence of this in that I observed ducklings of the same species in separate paddling (a group of ducklings with parent) of easily observable different sizes. I’ve been informed that if a duck loses her clutch, she will lay an additional one. Unfortunately, time is not on their side as they all must migrate at about the same time and size does make a difference.

The Sandhill Cranes, in past years have been observed passing through the area but in the last few years they are using the Island Lake, Little Lake (aka Hess Lake) area as a nesting range. I have observed one or two breeding pairs raising their one or two chicks in the area. Charlie Center and my family have started delaying any grass cutting activity on Gannon’s Landing and the Hess airfield and aprons until after the chicks have fledged. The tall grass is a prime foraging and hiding area for the chicks. Unfortunately, the area of the proposed seaplane base is also a prime area for the raising of the chicks. Additionally, if a driveway is constructed off the MooseyBou St. right-of-way to an adjoining parking area this will remove more foraging area.

Seaplane docks or slips built directly into the lake would not have a detrimental effect particularly if the number was kept between 5 to 10 moorings.

As I stated above, our family is not anti-aviation or anti-development. Our concerns are the sheer size and location of this development. I am also concerned about the destruction of the wetlands by both the channel and slip building in conjunction with the need for parking facilities and access roads. In conversations with pilots, I heard their concerns about the practical design of the seaplane base and the ability of aircraft to safely negotiate the slips and channels.

In closing I feel this development is much too large for the area concerned and the high concentration of aircraft in one area is unsafe and totally unfair to those of us who have lived on the lake for decades. If this development goes forward it should be downsized and limited to the shoreline abutting the lake. This would help to keep the Island Lake community a real community and not a hub for seaplane rental space with no connection to the Land, the Habitat, or the History of the lake.



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
*National Marine Fisheries Service*  
P.O. Box 21668  
Juneau, AK 99802-1668

January 22, 2024

Colonel Jeffrey Palazzini, District Commander  
U.S. Army Corps of Engineers  
Regulatory Division  
P.O. BOX 6898  
JBER, AK 99506-0898

Re: Island Lake Floatplane Basin, POA-2023-00398; NMFS ECO Reference No. AKRO-2023-03183

Dear Colonel Palazzini:

The National Marine Fisheries Service has reviewed the Public Notice of Application for Permit provided on December 15, 2023, regarding the above referenced project. The purpose of this project is to construct a seaplane base. The proposed scope of work includes dredging a wetland adjacent to Island Lake to create 31 float plane slips, accessed by three 75-foot wide channels and one 150-foot wide channel to Island Lake. Meadow Creek, which flows out of Island Lake and through the proposed project's footprint, would be rerouted through a 60-foot long, 12-inch diameter culvert to pass under an existing runway.

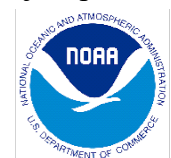
Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act and the Fish and Wildlife Coordination Act require Federal agencies to consult with us on all actions that may adversely affect essential fish habitat (EFH) and other aquatic resources. The EFH consultation process is guided by the regulation at 50 CFR 600 Subpart K, which mandates the preparation of EFH assessments and outlines each agency's obligations. In support of this consultation process, you provided a notice of the proposed action and your agency's conclusion regarding impacts on EFH. We offer the following comments and recommendations on this project.

### **Essential Fish Habitat**

The North Pacific Fishery Management Council designated EFH for all life stages of Pacific salmon, including freshwater habitat (NPFMC 2021). The Alaska Department of Fish and Game's Anadromous Waters Catalog identifies Little Meadow Creek (AWC- 247-50-10330-2050-3050-4027-5061) as supporting anadromous fish, including rearing coho salmon (Giefer and Graziano 2023). The mapped anadromous extent of Little Meadow Creek terminates at a culvert which is blocking fish passage approximately 500 feet downstream of the project area. Replacement of that culvert would restore anadromous fish passage to the lake.

### **Assessment of Effects to EFH**

Your agency has concluded that the proposed project activity would not adversely affect EFH in the project area. Federal regulations define an adverse effect as "any impact which reduces the quality and/or quantity of EFH" (50 CFR 600.810(a)). Based on our review of the project plans



and the information provided, we disagree with your determination. Our assessment of effects indicates potential adverse effects to EFH supporting Pacific salmon. The proposed rerouting of the stream would reduce the volume of available habitat by removing riparian vegetation and reducing habitat complexity by channelizing the stream. The proposed dredging activity could result in a discharge of sediment and organic material downstream, which could result in habitat degradation within the anadromous extent of Little Meadow Creek. The proposed 12-inch diameter culvert could restrict fish access to Island Lake. However, the aquatic resources and habitat can be adequately protected provided the permittee adheres to the standard conditions of the Federal permit, your identified conservation recommendations, and best management practices are followed. We also recommend the following conservation recommendations to further avoid or minimize project related effects.

### **EFH Conservation Recommendations**

Implementing the appropriate mitigation measures can avoid or minimize direct and indirect project related impacts associated with the dredging and culvert installation. In accordance with Section 305(b)(4)(A) of the MSA, we offer the following conservation recommendations to further avoid, minimize, mitigate, or otherwise offset effects:

1. The stream should remain in its current footprint and pass under the existing runway in its natural flow path.
2. Measures should be taken to limit the discharge of sediment and organic material into Little Meadow Creek.
3. Any structure to be placed under the runway should meet or exceed the stream width to ensure fish will be able to access the habitat in Island Lake.

Additional information related to these recommendations can be found in [Impacts to Essential Fish Habitat from Non-Fishing Activities in Alaska](#) (Limpinsel et al. 2023) and our [Regional website](#), where you can find FAQs.

A written response to our conservation recommendations is required within 30 days pursuant to Section 305(b)(4)(B) of the MSA. If your response is inconsistent with our recommendations, explain the reasons for not following our recommendations, including the scientific justification for any disagreements over the anticipated effects of the proposed action and the measures needed to avoid, minimize, mitigate, or offset such effects (50 CFR 600.920(k)). If you will not make a decision within 30 days, provide a letter to that effect and indicate when a full response will be provided. Significant changes to the project may require reinitiating consultation. Lucas Byker, [lucas.byker@noaa.gov](mailto:lucas.byker@noaa.gov), is available to answer questions or discuss further actions.

Sincerely,



Catherine Coon

Assistant Regional Administrator  
Habitat Conservation Division

cc: Estrella Campellone, USACE, [Estrella.f.campellone@usace.army.mil](mailto:Estrella.f.campellone@usace.army.mil)  
Sarah Wilber, ADFG, [sarah.wilber@alaska.gov](mailto:sarah.wilber@alaska.gov)  
Mike Campfield, Matanuska-Susitna Borough, [mike.campfield@matsugov.us](mailto:mike.campfield@matsugov.us)  
Theo Garcia, Knik Tribe, [tgarcia@kniktribe.org](mailto:tgarcia@kniktribe.org)  
Jessica Winnestaffer, Chickaloon Native Village, [jewinnestaffer@chickaloon-nsn.gov](mailto:jewinnestaffer@chickaloon-nsn.gov)

## References

- Giefer, J. and S. Graziano. 2023. Catalog of waters important for spawning, rearing, or migration of anadromous fishes – Southcentral Region, effective June 1, 2023, Alaska Department of Fish and Game, Special Publication No. 23-03, Anchorage.
- Limpinsel, D., S. McDermott, C. Felkley, E. Ammann, S. Coxe, G.A. Harrington, S. Kelly, J.L. Pirtle, L. Shaw, and M. Zaleski. 2023. Impacts to Essential Fish Habitat from Non-Fishing Activities in Alaska: EFH 5-year review from 2018-2023. National Marine Fisheries Service, Alaska Region, Juneau, Alaska. U.S. Dep. Commerce, NOAA Tech. Memo. NMFS-F/AKR-30. doi: 10.25923/9z4h-n860.
- North Pacific Fishery Management Council (NPFMC). 2021. Fishery Management Plan for the Salmon Fisheries in the EEZ off Alaska. Appendix A. Anchorage, Alaska, North Pacific Fishery Management Council.

**From:** [REDACTED]  
**Subject:** [Non-DoD Source] Public Comment Float Plane Base Reference number POA-2023-00398  
**Date:** Tuesday, January 16, 2024 9:12:38 AM  
**Importance:** High

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To Whom it may Concern,

This letter is in regards to the **Proposed Float Plane Base per Sterling Cook, Reference Number POA 2023-00398**

My Name is Danny Noland, I am a Local Business Owner (Royal Flush Septic Pumping) I am also a pilot, My business property with an airstrip is close to and almost in the flight path of the projected seaplane Base, Alaska has always been open to People Like Sterling Cook who takes it upon himself to see a need and try to fulfill a service that people like me and many people I know would benefit from. I have float Plane that I struggle finding moorage or places to leave them as we all don't own lake property, the lake property we find is extremely rare. I would hope that Alaska's tradition of Building its economy and needs continues.

I believe this to be a great plan in a great location, there is already a multitude of airstrips around this location, As it sits the air traffic in this area is extremely Minimal and the sea plane base would not congest or cause any adverse effect in our area. The lake is already designated as a seaplane Lake.

I am completely in agreement of this plan and look forward to completion of this project.

Danny Noland  
Owner



**From:** [REDACTED]  
**To:** [Campellone, Estrella F CIV USARMY CEPOA \(USA\)](#); [Vullo, Emily N CTR \(US\)](#)  
**Cc:** [Johnson, Sara E CIV USARMY CEPOA \(USA\)](#)  
**Subject:** [Non-DoD Source] REFERENCE NUMBER: POA-2023-00398 WATERWAY: Little Meadow Creek  
**Date:** Tuesday, January 16, 2024 5:27:33 PM

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REFERENCE NUMBER: POA-2023-00398  
WATERWAY: Little Meadow Creek

As a resident in close proximity to the area affected by the proposed wetlands dredging project for the establishment of a seaplane base, **we strongly oppose** the application submitted by Sterling Cook for the following reasons:

- 1. Environmental Impact on Wetlands:** The proposed project's extensive dredging and filling activities raise grave environmental concerns, particularly in light of Island Lake's uniquely shallow nature. This lake, with its modest average depth of three feet and a maximum depth of six feet, is inherently sensitive to any form of ecological disturbance. The planned extraction of a substantial 13,398 cubic yards of organic material from an area covering 3.11 acres of palustrine wetlands is not just a threat to these critical habitats, but it also poses a significant risk of fundamentally altering the lake's delicate natural balance.

The process of such extensive dredging in a shallow body of water like Island Lake is fraught with potential environmental hazards. One of the most pressing concerns is the destabilization of the lake bed. Disturbing the sediment layer in such shallow waters can lead to a cascade of ecological consequences. The agitation and subsequent displacement of sediments are likely to release nutrients that have been long settled in the lake bed. This sudden influx of nutrients, particularly nitrogen and phosphorus, can accelerate the process of eutrophication. Eutrophication is characterized by excessive plant and algae growth, which can lead to a depletion of oxygen in the water, severely impacting aquatic life and leading to dead zones where little to no aquatic organisms can survive.

Furthermore, the disruption of the sediment can cloud the water, reducing the penetration of sunlight, which is crucial for the health of aquatic plants and the overall ecological balance of the lake. This reduction in water clarity can adversely affect the feeding and breeding patterns of fish and other aquatic species, thereby disrupting the entire aquatic food web.

Additionally, the removal of such a large volume of organic material from the wetlands surrounding Island Lake cannot be understated. Wetlands are biodiverse ecosystems that serve as habitats for a variety of species, including several that are sensitive or endangered. They also play a vital role in filtering pollutants from water, protecting shorelines from erosion, and acting as natural water storage systems, thereby helping in flood control. The proposed project's impact on these vital functions could have far-reaching consequences beyond the immediate area, potentially affecting the broader ecological health of the region.

The environmental implications of the dredging and filling activities proposed for Island Lake are profound. The project's potential to destabilize the lake bed, induce

eutrophication, and disrupt the delicate balance of this shallow aquatic ecosystem, along with the detrimental impact on the surrounding wetlands, warrants a thorough re-evaluation of the project from an ecological perspective. It is imperative to consider alternative approaches that safeguard the lake's ecological integrity and the vital functions of the wetlands.

## **2. Disruption to Residential Peace and Tranquility:**

Our community, being entirely residential, cherishes its current peaceful and serene character, which is at odds with the proposed commercial seaplane operation. The introduction of such an operation represents a significant shift from the existing community ethos and lifestyle. Given the shallow depth of Island Lake, the potential for noise and disturbances from seaplane activities is a major concern. In shallow bodies of water, sound waves travel more efficiently, which means that the noise generated by seaplanes - including engine sounds and water splashes during takeoffs and landings - could be amplified, leading to a greater auditory impact on the surrounding area.

Furthermore, the operation of 31 floatplane slips suggests a considerable increase in both aerial and waterborne traffic. This escalation in activity not only disrupts the visual and acoustic tranquility of the lake but also poses a risk to the safety and privacy of residents. The constant coming and going of seaplanes could transform the quiet lake environment into a busy, noise-polluted area, significantly diminishing the residential quality of life that our community members highly value.

The introduction of a commercial venture of this scale also raises concerns about the potential for environmental pollution. Fuel spills, increased emissions, and potential litter associated with increased human activity could degrade the water quality of the lake and surrounding areas. This degradation not only affects the aesthetic value of the lake but also has potential health implications for both residents and local wildlife.

Moreover, the peaceful enjoyment of the lake for recreational purposes such as swimming, fishing, and boating could be severely compromised. The presence of seaplanes might restrict access to certain parts of the lake, limit recreational activities, and pose safety risks to individuals engaging in water-based activities.

In addition to the immediate disturbances, there is also the potential for long-term socio-environmental impacts. The change in the area's character could lead to a decrease in property values, as the reasons that once made the location desirable – its tranquility and natural beauty – are overshadowed by the commercial activity and its associated nuisances.

In conclusion, the introduction of a commercial seaplane operation in our entirely residential area is not only incompatible with the existing community character but also threatens to fundamentally alter the lifestyle and environment that residents currently enjoy. The project's implications extend beyond mere inconvenience, posing substantial risks to the quality of life, environmental integrity, and property values in our community. It is crucial to reassess the suitability of this project in the context of its broader impact on the residential nature of our community.



3. **Safety and Navigational Concerns:** The proposal to construct multiple access channels linking the seaplane base to Island Lake significantly heightens safety concerns, further complicated by the fact that the airspace over the lake is uncontrolled. This lack of air traffic control in the vicinity, combined with the increased seaplane activity near residential and recreational areas, substantially escalates the risk of accidents and conflicts.

In an uncontrolled airspace, pilots largely rely on visual flight rules and their own judgment to avoid collisions, navigate, and communicate with other aircraft. With numerous private airstrips in close proximity to Island Lake, the airspace is already utilized by a variety of aircraft. Adding a considerable number of seaplanes into this mix could lead to crowded skies, increasing the potential for mid-air collisions or near-misses, especially during peak times when multiple aircraft are taking off or landing.

On the water, the creation of access channels for seaplanes introduces additional hazards. These channels would likely intersect with areas used by swimmers, boaters, and other recreational users, creating a complex and potentially dangerous environment. Seaplanes, while maneuvering to dock or take off, might not always have a clear line of sight, particularly in a lake as shallow as Island Lake. This situation is fraught with the risk of accidents involving both watercraft and swimmers, which could result in serious injuries or even fatalities.

Furthermore, the increased seaplane traffic could disrupt the natural behavior of local wildlife, particularly waterfowl and other aquatic species that inhabit or frequent the lake. The disturbance caused by seaplanes could force these animals to relocate, thereby disrupting the local ecosystem.

The combination of uncontrolled airspace, proximity to multiple private airstrips, and the introduction of a seaplane base in a residential and recreational area creates a complex and hazardous environment. This not only poses a direct risk to human safety but also impacts the local ecology and the peaceful enjoyment of the lake by residents and visitors. The safety implications of this proposed project are substantial and must be carefully evaluated to ensure that the introduction of increased air and water traffic does not compromise the well-being and safety of the community and its environment.

4. **Community Opposition:** The community's strong opposition to the proposed project is deeply rooted in an understanding and appreciation of Island Lake's unique characteristics. As residents who have long cherished the lake's current state, there is a profound awareness of the potential irreversible changes that could arise from such a development. This project, involving significant modifications to the lake and its surroundings, threatens to alter the very essence of the environment that the community holds dear.

Island Lake's shallow waters, tranquil environment, and rich biodiversity contribute to its charm and ecological significance. The introduction of a seaplane base with extensive dredging and construction activities poses a risk not just to the physical attributes of the lake but also to the lifestyle and sense of place valued by the residents. The disturbance to the natural soundscape, increased traffic, and

potential ecological imbalance could transform the serene lakefront into a busy, industrial zone, stripping away the peace and natural beauty that define the area.

Furthermore, the residents' opposition is informed by a keen understanding of the delicate balance within the lake's ecosystem. The introduction of seaplanes and the accompanying infrastructural changes could disrupt wildlife habitats, affect water quality, and lead to a loss of biodiversity. Such environmental impacts are not merely temporary disruptions but could represent long-term or even permanent damage to the ecological integrity of the area.

The community's collective concern goes beyond individual preferences; it reflects a shared responsibility to safeguard the environment for future generations. The potential for lasting environmental degradation, coupled with the disruption to the community's way of life, underscores the importance of this opposition. It's not merely a resistance to change, but a call to preserve a valuable and irreplaceable natural asset.

In the decision-making process, it is essential to give substantial weight to these community concerns. The residents' deep connection to and understanding of their environment represents a critical perspective that goes beyond mere technical assessments. Their opposition is a reflection of the intrinsic value they place on maintaining the ecological and cultural integrity of Island Lake, making it imperative for their voices to be heard and considered in any final decision regarding the proposed seaplane base.

- 5. Impact on Local Ecosystem and Wildlife:** The area surrounding Island Lake is characterized by its sensitive ecosystems and diverse wildlife, making it a crucial habitat for numerous species, particularly those dependent on wetlands. The proposed project, which involves substantial disturbance to these habitats through dredging and rerouting of waterways, poses a significant threat to this delicate ecological balance.

One of the primary concerns is the impact on local biodiversity. Wetlands are known for their rich variety of life, serving as breeding grounds, feeding spots, and shelters for a myriad of species. Disrupting these areas, especially through the rerouting or establishment of new waterways like Little Meadow Creek, could lead to habitat loss, alteration of breeding patterns, and reduction in food resources. This disturbance could have cascading effects, potentially leading to a decline in certain species and an imbalance in the local ecosystem.

The alteration of water flows and water levels is another critical issue. Island Lake's shallow nature, coupled with the absence of significant incoming streams or other water sources, already places it in a fragile ecological state. Any changes to the water levels or flow patterns, as envisaged by the project, could be detrimental. Fluctuations in water levels can affect the growth and survival of aquatic plants, disrupt the life cycles of fish and amphibians, and alter the physical characteristics of the lake, thereby impacting the entire aquatic ecosystem.

Furthermore, the wetland-dependent species, which rely on the stability of their habitat, could face severe repercussions. These species are often finely attuned to

specific ecological conditions, and even minor alterations can have outsized effects on their survival. The proposed project's impact on the wetlands could lead to a reduction in biodiversity, with some species potentially facing extinction in the area.

Moreover, the project's impact extends beyond the immediate vicinity of the lake. Wetlands play a vital role in filtering pollutants, controlling floods, and maintaining water quality. Disturbing these areas could have wider environmental implications, affecting not just the lake and its immediate surroundings but also the broader regional ecosystem.

The proposed project's potential to alter the delicate ecosystems of Island Lake and its surrounding wetlands should be a matter of serious concern. The changes in water levels, flow patterns, and habitat disruption could have long-lasting and possibly irreversible negative effects on local biodiversity, including wetland-dependent species. It is crucial to thoroughly evaluate these ecological impacts and consider the far-reaching consequences that such a project could entail for the local and regional environment.

**6. Questionable Need and Economic Viability of Additional Seaplane Facilities:**

The applicant's assertion of a backlog in obtaining floatplane slips in the Matanuska-Susitna valley is not a sufficient justification for the proposed project, especially when considering the significant environmental and social costs involved. It is essential to point out that the perceived shortage of available slips may be overstated. In the vicinity, there are numerous lakes with ample seaplane docks and slips readily available for rent. For instance, June Lake, located just a few miles away, currently has over 10 vacant slips. This availability is further evidenced by personal experience; before purchasing land at Island Lake, I had successfully secured moorage at Cottonwood Lake, which offered convenient access and excellent facilities.

Additionally, from a financial perspective, the proposed seaplane base at Island Lake appears economically unfeasible. The high costs associated with the development of this project seem to outweigh the potential returns on investment. This imbalance raises concerns about the project's long-term sustainability and increases the risk of project abandonment. If the project is left incomplete, it could lead to further environmental degradation and negatively impact the property values of nearby residents. Therefore, it is critical to consider not only the environmental and social implications but also the economic viability of the project. The exploration of alternative solutions that do not disrupt residential areas and the environment, and which are economically sustainable, should be a priority in addressing the need for additional seaplane facilities in the region.

**7. Lack of Adequate Mitigation Measures:** The proposed mitigation measures for the seaplane base project, which primarily include minimal excavation depth and planting grass on the banks, appear to be markedly inadequate in addressing the extensive environmental impacts that the project is likely to entail. Given the scale and complexity of the project, these measures fall short of providing comprehensive protection or restoration of the affected ecosystems.

Firstly, minimal excavation depth, while potentially reducing the immediate

disturbance to the lake bed, does not negate the broader ecological consequences of dredging. Excavation, even if minimal, can still disrupt sediment layers, releasing nutrients and pollutants that have been settled and could lead to problems like eutrophication. It also does not address the issue of habitat loss for aquatic and wetland species.

Secondly, planting grass on the banks, though beneficial for erosion control, is a relatively superficial measure when considering the broader ecological impacts. This approach does not compensate for the loss of biodiversity, nor does it replicate the complex functions of the wetland ecosystems that might be destroyed or altered. Wetlands provide a range of ecological services, including water filtration, flood mitigation, and habitat provision, which cannot be replaced simply by planting grass.

Moreover, the lack of compensatory mitigation is a significant oversight. Compensatory mitigation is critical in large-scale projects like this, where environmental impacts are inevitable. It involves restoring, establishing, enhancing, or in some cases preserving, wetland, stream, or other aquatic resources to compensate for unavoidable impacts. The absence of a compensatory mitigation plan suggests a gap in the project's environmental responsibility and sustainability.

Given the scale of the project and its potential to cause irreversible damage to Island Lake's delicate ecosystem, it is imperative that any mitigation strategy be robust, multi-faceted, and aligned with the best practices in environmental conservation and restoration. This should include not just mitigating the immediate impacts of construction but also long-term strategies to monitor and restore ecological balance, enhance biodiversity, and ensure the health of the lake and surrounding wetland ecosystems.


Furthermore, involving ecological experts in developing a comprehensive mitigation and restoration plan would be beneficial. This plan should be dynamic and adaptable, taking into account ongoing environmental monitoring and feedback. Such an approach is crucial to ensure that the ecological integrity of Island Lake and its surroundings is preserved for future generations.

The proposed mitigation measures, such as minimal excavation depth and planting grass on banks, seem insufficient to fully address the extensive environmental impacts of the project. Moreover, no compensatory mitigation has been proposed, which is a significant oversight given the scale of the project.

In conclusion, considering the unique characteristics of Island Lake, the proposed wetlands dredging project for a seaplane base poses unacceptable risks to the environment, community, and local wildlife. We strongly urge the Department of the Army and the U.S. Army Corps of Engineers to deny the permit application and protect the integrity and tranquility of Island Lake and its surrounding community.

Regards,  
Chip Anderson



**From:**   
**To:** [Campellone, Estrella F CIV USARMY CEPOA \(USA\)](#)  
**Subject:** [Non-DoD Source] Proposed Island Lake float slips  
**Date:** Monday, January 15, 2024 2:31:44 PM

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I oppose the project to create 31 float slips for public use on the south end of Island Lake. There is no shortage of float slips accessible to pilots across the various lakes in the Matsu area. With literally hundreds of unused slips a pilot need simply post a request to social media to obtain any number of options. A business on Island Lake is not required or desired.

This project threatens critical salmon habitat not only through the additional silt created during construction, but also during any future dredging required to keep the access open. Additionally the introduction of heavy metals and oil runoff from 31 aircraft tightly concentrated in this area could prove disastrous to local wildlife and salmon.

The enjoyment of the public on this lake would absolutely be negative impacted by operations from the proposed project.

I could be convinced to support this project if there were strict limits imposed on operations and the number of take/offs and landings allowed by each specific aircraft per week with operations also required to stay over 100 feet from shore and no step taxiing. There would need to be heavy penalties for exceeding these limits. A pollution response plan with aircraft owners responsible for cleanup and insurance for all renters of the slips. There would also need to be a prohibition on fuel tanks or fueling/defuelling at the 31 slips facility as well as a permanent prohibition on all forms of maintenance with the exception of emergencies.

I currently have a contract to purchase an home and lot with frontage on Island Lake and I have extended the due diligence period due to discovery of this proposed project and my concerns about the impacts of this project. If the project is approved my current intentions are to terminate my purchase contract.

Vr  
Michael Crider

Sent from my iPad

Robert H. Coffin

Sara E. Johnson  
Estrella F. Campellone  
Army Corp of Engineers  
Anchorage, Alaska

RE; Island Lake floatplane facility

Ref# POA-2023-00398  
Waterway; Little Meadow Creek

To all concerned,

I STRONGLY oppose the approval of project POA-2023-00398

I am a property owner and live on Island Lake and have for over 35 years. I own a plane and fly it off the lake.

As a long time property owner on the lake I would like to maintain the character of the lake and have a safe place for my grandchildren to canoe safely.

I offer the following comments;

1. I am requesting a "PUBLIC HEARING" concerning the proposed float plane facility.
2. WHY was only ONE lake front homeowner notified of this proposed project?
3. WHY were no information notices posted in the community?
4. The Matanuska Susitna Borough management plan Section 3-3.2 calls for maintaining the "Recreation and Residential Character" of the lake. Section 3-3.3 calls for the 'Migratory wildlife' to be preserved. The proposed addition of over 30 planes on the lake landing and taking off is NOT compatible with the management plan.
5. Has the FAA been notified as to the potential hazard of over 40 planes based on such a small lake? Where are all of these planes going to taxi and warm up on such a SMALL lake? This is an accident that WILL happen.
6. We currently have a problem on the lake with the proper use, or no use of radios on the lake. Who will enforce the proper radio procedure of over 40 planes to prevent accidents?

7. Has a properly engineered study been performed concerning the addition of 31 planes to the lake? Is there a fueling area properly protected to prevent lake pollution. What is each plane owner to do with the excess fuel when they check the tanks? (FAA Requirement)
8. Will there be insurance in place to cover the cost of fuel remediation? This is a requirement in most areas. Will each plane owner be required to have insurance to cover the damage to our property as lake front property owners? Who will monitor this requirement?
9. Was the Matanuska Susitna Borough advised as to its noise ordinance? How much noise will 31 planes running up generate? Other Borough requirements?
10. Where are over 60 cars going to park? ( at least 2 per )
11. This lake connects to a salmon rearing stream. Is Alaska Fish and Game aware of the potential of stream pollution?
12. Has the existing wildlife situation had a proper study done? The lake has Loons, migratory swans, ducks, moose, bears and a few bald eagles the last several years.

In conclusion this project is in no way suited for a residential lake!

*Robert Coffin*

12 January 2024

Estrella Campellone  
Army Corps of Engineers, Regulatory Division, CEPOA-RD  
PO Box 6898  
JBER, Alaska 99506-0898  
estrella.f.campellone@usace.army.mil

Re: POA-2023-00398

Dear Ms. Campellone:

I request that you deny the permit for the float plane dock in the current planned location. Island Lake, where this facility is to be located is at the headwaters of Little Meadow Creek, which has coho rearing in it (AWC # 247-50-10330-2050-3050-4027-5061). The stream appears to originate from the south end of the lake with coho known to be as far up as North Pittman Road, where the wetlands between the lake and anadromous section of the stream exist. It is this wetland that the permit requests to dredge and fill for access to the proposed float plane dock. It is likely that there are coho all the way to Island Lake, and that the 550 feet between the road and lake simply have not been documented yet.

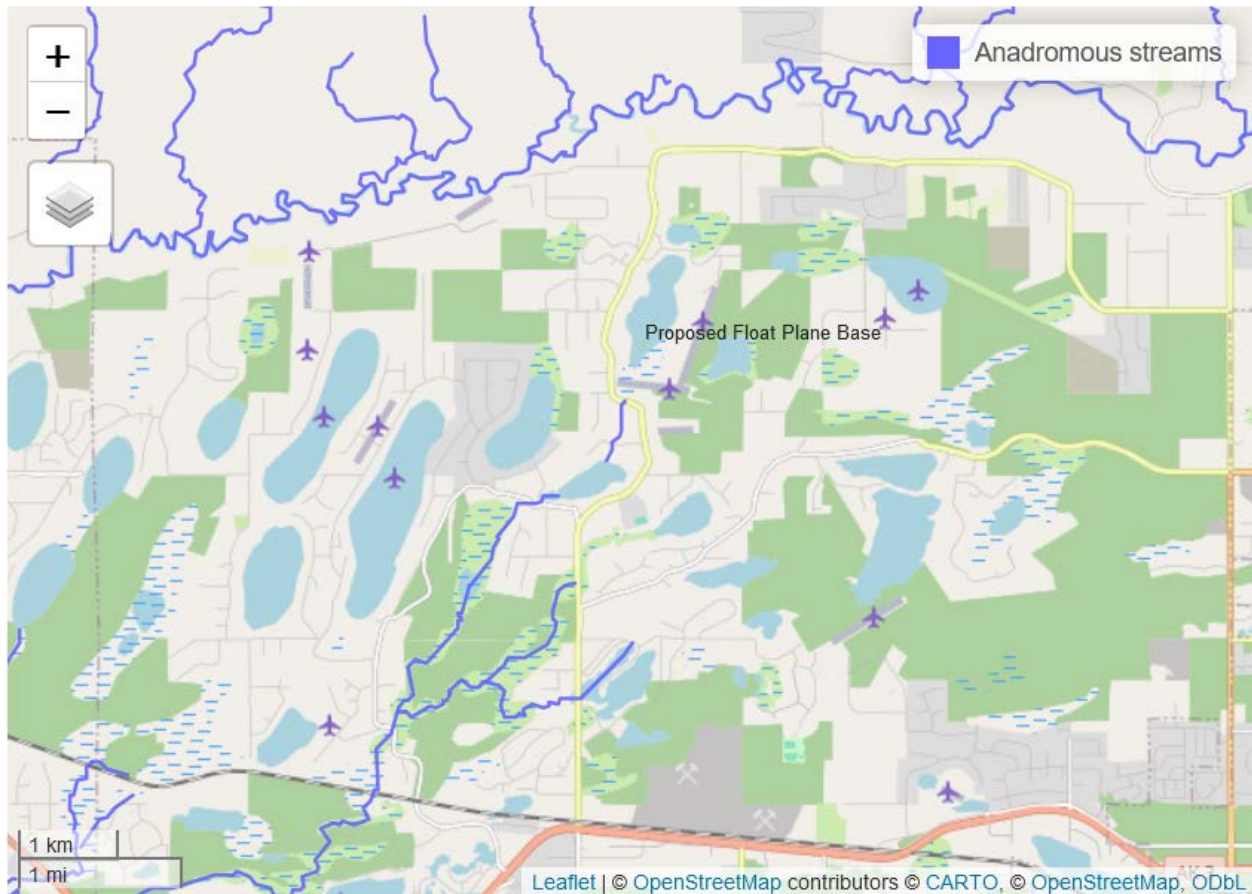
I object on the following grounds:

1. The project would dredge and fill wetlands that are necessary for an anadromous stream. Wetlands generally play important roles in filtering sediment and pollutants out of waters, provide habitat for the insects fish feed on, provide nutrients, allow flood waters to infiltrate so that fish habitat downstream is subject to fewer extremes in flood flow (that can scour fish habitat) and low flow (that can lower the oxygen and raise the temperature in streams). Simply routing water through a culvert will not fulfill any of these wetland functions.
2. Placing a large number of float planes on the lake will increase the pollution from gas and oil. This will not only increase pollution in the lake, but by removing wetlands, there will be a much smaller wetland area to help filter pollutants from the south end of the lake and the access road before they reach coho habitat.
3. There does not appear to be any plan to ensure that *Elodea* does not become established in Island Lake and surrounding lakes. *Elodea* is already a large problem that the Mat-Su Borough and partners have been trying to reduce for several years.
4. There are numerous seaplane bases within 10 miles, several within two miles of the proposed location. NONE of them are next to anadromous streams. A few of the closest ones are:
  - June Lake, with an associated Airpark, less than half a mile away with room for 30 aircraft. It is unclear whether this is a public seaplane base (<https://www.alaskahandbook.com/places/june-lake-seaplane-base-2/>) or private (<https://www.airnav.com/airport/66AK>).
  - Seymore Lake seaplane base, public, with room for 22 planes (<https://www.airnav.com/airport/3A3>)
  - Visnaw Lake seaplane base, public, with room for 22 planes (<https://www.airnav.com/airport/T66>)



- Wallis Lake seaplane base, private, room for 5 aircraft (<https://www.airnav.com/airport/62AK>)
5. If the existing seaplane bases are not sufficient for the need, there are other lakes in the area that are not associated with anadromous streams, such as Scott and Lalen Lakes.

Below is a screenshot of an interactive map I made of the area. The proposed float plane base is the lake that the “P” in “proposed” is on, with runways to the south and east. The full interactive map is available on request.



I urge you to deny this permit application, and request that one be submitted that does not put anadromous streams, and especially a stream with associated wetlands, at risk.

Thank you,  
Kendra Zamzow





## Case Information and Privacy Authorization Form

The Privacy Act of 1974 (18 USC, Sec. 205) requires that Members of Congress or their staff have written authorization before they can obtain information about an individual's case. We must have your signature to proceed with a casework inquiry.

Name: \_\_\_\_\_

Social Security Number: \_\_\_\_\_ Date of Birth: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Day Telephone: \_\_\_\_\_ Evening Telephone: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

Agency Involved: \_\_\_\_\_ Case Number (if applicable): \_\_\_\_\_

Please describe the situation for which you are requesting assistance:  
(Please attach additional sheets if more space is needed)

---

In signing this release form, I acknowledge that all information I provide to my Member of Congress and his/her staff (including medical documentation) will be forwarded to the above agency and their agents reviewing my case file. I hereby authorize the release of any and all information by the above agency to my Representative and his/her staff, employees and/ or agents necessary to fully respond to the instant inquiry.

SIGNED: \_\_\_\_\_ DATE: \_\_\_\_\_

Please print and return to the office via mail, email, or fax.

To, Estrella Campell , USACE

I would like to voice my concerns and objections to the POA- 2023 00398 presently under review by the Army Core and your office.

**1. First-No Notification.** Why weren't the land owners of lake lots on Island Lake notified in a timely manner of this project under your review? And then when we were notified, we had next to 'no time' to provide any input! A number of lake lot owners are out of State due to the holiday season and contacting them now in such a short period of time is difficult to do. I believe the time for input concerns should be extended to provide time for us to locate, inform, and receive input from these land owners.

**2. Loon and animal life in danger.** My wife and I presently own two lots on Island Lake and another ten lots adjacent to those two lots or across the road from the lake. We purchased these lots to ensure our privacy and to insure quite surroundings. We first purchased the home and two lots from my brother who bought them in the early 70s. You could hear the Loons calling in the early mornings. We loved that quietness and decided to purchase every lot we could to maintain that serene quietness. At that time the Loon population flourished. Over the years the Loon population has dwindled because of more and more devolvement on the lake lots as well as more aircraft activity. If another 30 plus aircraft are using the lake; this will devastate the nesting of the Loons. Also there are numerous migrating ducks that nest on the lake. The Swans and the Sand Pill cranes will no longer nest here because of the noise, as well as the wake from the aircraft flooding their nests. Other wildlife nest on the lake as well. So, if this project is approved the wild life will be greatly affected.

**3, Contamination of the lake** because the fuel and oil leaks will be even a greater risk. Some lake lot owners utilize the lake as a source of water for washing clothes, bathing, and more. The contamination creates a health risk to humans. Aircraft operators purge the fuel tanks before each flight. Most often the fuel is left to drain into the lake or maybe caught in a container and when no one is looking poured out. When air craft are refueled there are occasionally spills, resulting in even more contamination to the lake. Where and how will fuel be stored and prevented from leaking into the lake?

**4, Safety.** A couple of years back the Borough division of parks decide to install a public access on the Northen end of the lake. This allowed for more access to the lake by the general public. Because of this; more and more boaters, canoers, kayakers, and Water skiers are utilizing the lake. I have personally seen a couple of occurrences were aircraft had to abort their landing to avoid personal on the lake. There is no strict guidance as to who has the right of way when operating aircraft on water. CFR title 14 part 91.115 states that aircraft will give right-of-way to Vessels. Who will be liable if an accident occurs with one of the slip-renters" aircraft? Army core- for approving the project? the slip owners? the aircraft operator? boater? canoer? swimmer? kayaker? So, with more aircraft, more public access; the risk greatly increases. So, safety is a concern

**5. Restricting the use of the lake** by the lot owners and general public, to provide safe operation for the aircraft operation. Polits believe that there should be nothing that hampers their operation. For example, Willow float plane operators have tried and are still trying to restrict the use of boats and canoes on the lake because of safety concerns. This is also true of Campbel lake. Lake Hood-Lake Spenard were once open to the public for boating and other recreational activities, but now the lake is

totally restricted: no boats, canoes, no swimming. Because of aircraft operations on the lake, it is so contaminated; it is now a dead lake. We, the lake lot owners, pay an increased tax assessment for our lake lots compared to a lot of the same size that is not on the lake. I am worried about the prospect of losing our ability to use the lake because of safety concerns due to aircraft operations and more flights.

6. **Land value.** With the increase of aircraft usage, the occurrence of a higher noise level will greatly increase also. Few people want to purchase a piece of property that is inundated with aircraft noise. Our property value will decrease although our tax assessment will stay the same or increase. So, loss of investment is a concern.

7, **Water level.** The project requests to move Little Meadow Creek, installing a culvert under the existing runway. This culvert will freeze in the winter and take a long time to thaw out in the spring. This will allow the lake to rise and flood low lying lake lots. Installing thaw pipes will not eliminate the problem. This has been proven by an existing problem on the North end of the Lake. Doubloon lake drained into Island lake via a natural out fall creek. The Borough decided to install culvers at what was designed to be a cul-de-sac on both sides of the outfall. This caused the Doubloon lake water level to rise and flood the surrounding lots, One can see what was once Birch and spruce trees are now dead trees because they were flooded by rising water. Therefore, I foresee, that; messing with the creek will cause flooding of lake lots in the future.

In August 1996 the Island lake/ Doubloon lake Management plan was approved. We were concerned about the loss of wildlife; IE. Loons, and Grebes, as well as other migrating birds, caused by increasing noise and wake levels. This plan has slowed down the decreasing loss of wildlife. The approval of this project will negate our efforts to save the wildlife. This plan is still in effect with no expiration date that I was able to find.

In 2005 the Meadow Lakes Comprehensive Plan was approved. This plan was written to establish a plan for future development of Meadow Lake area. In this plan Section D, page 40-41 established Land use districts. The areas proposed for this project was identified as 'Rural Residential', Paragraph 5 Watershed & streams discourage this area for commercial use. That's what this project is a commercial business. Also on page 63: Addresses how important Upper Little Meadow Creek and area is for recharging aquifers. In addition; requires compliance with US Army Corp of Engineers Wetland Policies that require avoidance or mitigation of action that adversely affect Wetlands.

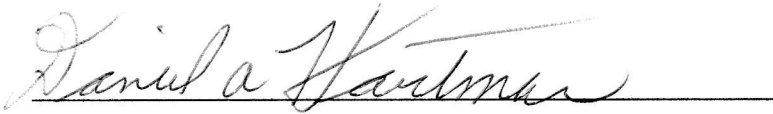
So, in conclusion my concerns are:

- 1, Animal and wildlife decimation
- 2, Contamination of the lake
- 3, Safety for aircraft operators as well as for general public.
- 4, Future Restrictions of public use on the lake.
- 5, Land value depreciation
- 6, Increase noise level

7, Maintaining lake water level

As Manger of Ted Stevens Anchorage Int' Airport Field Maintenance where maintaining Lake Hood / Lake Spenard were my responsibility for 10 years I've seen and encountered many of the these problems

The project: POA-202300398 needs to be denied!!!

A handwritten signature in cursive script that reads "Daniel A. Hartman". The signature is written in black ink and is positioned above a solid horizontal line.

Daniel Hartman

In reply to POA-2023-00398  
Little Meadow Creek PN

There are so many issues with this proposal that it is difficult to choose a place to start. So, we will address how this affects Island Lake lake front property owners. Island Lake already has nine to twelve aircraft operating off this lake on a daily basis, just with the landowners use. (With the potential of 8-10 more.) There are many times that there will be swimmers, boaters, paddle boarders, kayaks, canoes and aircraft using the lake at the same time, which in our opinion is already extremely busy for the size of the lake and its number of residents.

The first thing that came to mind is the safety of our families that use the lake daily. As we stated the lake is already very busy. By already having 8-12 aircraft owned by residents, adding 31 more you create a dangerous situation. At any given time is the possibility to have 43 aircraft, 5-8 boats, 10-15 paddle boards, Kayaks, canoes and up to 20 people swimming, most of them children.

Landowners have watched wildlife diminish over the past 10 years or so, the majority of those being waterfowl and other birds. The added traffic to this lake would have a very negative impact on these animals. We have already witnessed it to some extent. It is a frustrating thought that there is more value on a stocked fish than is put on the natural creatures that survive in the waters of this lake. To clarify, the fact that this lake is not stocked by Alaska Fish and Game as stated in the proposal as selling point, indicates that all the natural creatures that live here are of little value.

Another issue for residents is land values. It is a known fact that noise pollution and aircraft congestion on Island Lake will affect how desirable our homes and property are to potential buyers.

It is very unimaginable that a project that affects land values, wildlife, daily recreational use, happiness, and safety of existing landowners would even be considered. This kind of project has the potential for commercial use which will happen regardless of proposed slip usage. It has the potential to have an extremely high volume of air traffic if there happens to be guides, sightseeing tours or any commercial aviation use. This kind of development belongs at Wasilla Airport, Willow Airport and areas already supporting this kind of usage, not a residential area.

It is hard to imagine how 31 aircraft can operate safely in those canals and slips. There is very little tree coverage to block wind and as you know float planes have no brakes! Not to mention 31 aircraft leaking oil and sumping fuel tanks near or in the swamp or lake. Our Families play on and swim in this lake!

The canals also create a situation for more algae growth in the lake. We highly doubt a 12-inch culvert will remedy this issue. It is unfortunate that this project would even be considered due to its negative effect on residents for the financial gain of one person!

Also, many residents did not receive a mailer notifying us of this project and residents that did have had very little time to act.

Many of the Island Lake residents are pilots and understand the effects of having this many aircraft in a small area. It's dangerous not only in the air but on the ground and water. In approximately 5 square

miles there is Charlie Center air strips (X2), Piper Landing, Flying Crown, June Lake Strip, Leisure Wood, Two Lakes, Seizek Strip, Wolf Track, Kalmbach strip, Shawn Field, Sunrise Road strip, Bush Pilot Est., Johnson Road, Sylvan Road Strip, Wasilla Airport and King Aurthur Strip. These are just the gravel and paved runways. Float plane lakes in this 5-mile area are Island Lake, Scott Lake, Beverly Lake, Kalmbach Lake, June Lake, Cloudy Lake, Fuller Lake, Seymore Lake, Visnaw Lake, Lalen Lake, Toad Lake, Frog Lake, Cherry Lake, Prator lake, Loon Lake, Bear paw Lake, Blodgett Lake, Wallace Lake, Jacobson Lake, Rainbow Lake, Railroad Lake, Carousel Lake and Maruro Lake. And most likely we have missed a few. Adding 31 more aircraft to this already congested area will be fatal to someone either on the ground, on the lake or in the air. People that live in this area try to be safe and respectful to their neighbors. This proposal has blatant disregard for anyone that lives on or near Island Lake.

Parking does not appear to be addressed really at all. The organics dug from the swamp will not be bearing soils and sheet 5 of 5 states they will be used to build up between slips. This soil and organics will not set and bind together to make parking, loading or fueling areas. Parking for 31 vehicles does not appear to be realistic in this proposed area and neither does the navigation of a high number of aircraft.

The time given to address this is unrealistic for Island Lake residents. Many did not receive a mailer and the residents did not feel the reply time is sufficient. Many people are out of state for the winter, holiday or vacation.

This proposal has been presented as a benefit to the community but is only a benefit to one person and their bank account. This does not in any way enhance the Meadow Lakes area. It will bring in people who do not live in Meadow Lakes/Island Lake and are not vested in keeping our community clean and safe.

Signing list of residents attached

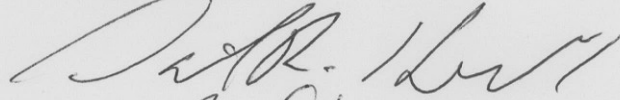
January 5<sup>th</sup> 2024

Public Hearing is being requested for POA 2023-00398 Little Meadow Creek. See attached letter for reasons.

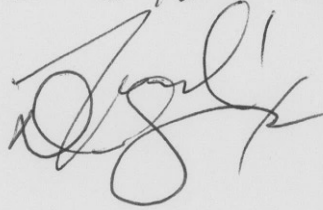
Printed Name

Signature

Daniel R. Hull



JASON A. SOLSVIG



Danielle E. Solsvig

Dan Hartman  
DAN HARTMAN









Owner Search ▼ Search

## Owner Search Listing

Account ID	Owners	Address	Subdivision	Map	PDF	DXF
7565B04L002	HARTMAN DAN'L A & DONNA L		D & D EST ADD 1			
6319B03L013	HARTMAN DAN'L A & DONNA L		TREASURE IS			
6319B03L007	HARTMAN DAN'L A & DONNA L		TREASURE IS			
6319B03L006	HARTMAN DAN'L A & DONNA L		TREASURE IS			
6319B03L009	HARTMAN DAN'L A & DONNA L		TREASURE IS			
6319B03L008	HARTMAN DAN'L A & DONNA L		TREASURE IS			
7565B04L001	HARTMAN DAN'L A & DONNA L		D & D EST ADD 1			
6319B03L012	HARTMAN DAN'L A & DONNA L		TREASURE IS			
7413000L001	HARTMAN DAN'L A & DONNA L		D & D EST			
6319B03L011	HARTMAN DANIEL		TREASURE IS			
<del>5331900L005</del>	<del>HARTMAN DANIEL HARTMAN CRYSTAL</del>		<del>CACHE GRK REC</del>			
6319B03L010	HARTMAN DANIEL A & DONNA		TREASURE IS			
6319B04L007	HARTMAN DANIEL A & DONNA		TREASURE IS			

THEIR ARE 2 LOTS ON THE LAKE  
 THE OTHERS ARE A JEWEL ON APPROX  
 DOUBLE OR DRIVE FROM LAKE



# Chickaloon Village Traditional Council (Nay'dini'aa Na' Kayax)

December 21, 2023

Chief Gary Harrison,  
*Chairman/Elder*

Philip Ling,  
*Vice-Chair*

Cheryl Sherman,  
*Secretary*

Doug Wade,  
*Treasurer/Elder*

Emily Ling,  
*Member*

US Army Corps of Engineers, Alaska District  
Anchorage Regulatory Division (1145)

CEPOA-RD  
Post Office Box 6898

JBER, Alaska 99506-0898

Re: Application for Permit - Little Meadow Creek (POA-2023-00398)

Dear Army Corps of Engineers (ACOE),

Chickaloon Native Village (CNV) or Nay'dini'aa Na' Kayax is a federally recognized Tribal Government in Alaska (Federal Register, Volume 47, Number 227, November 24, 1982, and reaffirmed in Federal Register, Volume 58, Number 202, October 21, 1993), with the full power and authority to consult and enter into agreements with local, state, and federal governments at their discretion. Chickaloon Village Traditional Council (CVTC) is the governing body of CNV as recognized by CNV Tribal citizens with the full power and authority to act for CNV. CVTC has a responsibility to provide a government for the good health and welfare of its Tribal citizens and address any needs in its community. Actions that occur within CNV's traditional ancestral territories and customary area of use may impact our environment, our cultural resources, and the health, safety, and welfare of our Tribal citizens.

Little Meadow Creek, and furthermore Island Lake, are within the CNV's customary area of use. CNV Tribal citizens have stewarded, and been sustained by, the aquatic resources of CNV's traditional ancestral area for millennia. CVTC has a significant interest in participating in natural resource management decisions that could affect anadromous fish, water quality, and Cook Inlet Beluga Whales.

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act), as amended in 1996, encourages the conservation and enhancement of Essential Fish Habitat (EFH) "*those waters and substrate necessary to fish for spawning, breeding, feeding or growth to maturity*" (16 U.S.C. 1802(10)). Though the applicant believes that the site is outside EFH (as stated in the project application), the fact is: Little Meadow Creek is anadromous, and specifically a spawning and rearing habitat for coho salmon (*Oncorhynchus kisutch*). The proposed project application asks for permits to: 1) reroute Little Meadow Creek, 2) excavate a floatplane runway through EFH of viable salmon stream habitat and adjacent and connected wetlands, 3) excavate some of the wetland shore of Island Lake to expand lake footprint for floatplanes, 4) fill some of the wetland shore of Island Lake to expand footprint of land with lake access for floatplanes, 5) and create a stream channel/trench for Little Meadow Creek within the new lake area pass the

Lisa Wade,  
*Executive Director*

Serena Martino,  
*Executive Assistant*



water. It is inappropriate to excavate and fill anadromous wetlands and build over anadromous streams for the benefit of development, in this case floatplane users and business. The current permit application should not be approved.

Additionally, the proposed site construction does not designate road access to the proposed runway and floatplane dock areas. This would require the applicant to apply for additional permitting and would result in the destruction of even more valuable fish habitat. Approving permitting for this project, leads to a dangerous precedent of allowing landowners to dig-in and fill wetlands and anadromous streams, which increases the stressors salmon populations that are already stressed and in decline.

Furthermore, a formal cultural resource survey should be conducted before a permit is approved. The Alaska Heritage Resources Survey (AHRS) database for cultural resource management is woefully incomplete. Throughout Southcentral Alaska, recent surveys have identified many sites in areas where there were previously none according to the AHRS.

When working underwater with ground disturbing work USACE should keep in mind that the conditions of peat bogs can be anaerobic and preserve organics within the water and soil and may preserve artifacts, cultural resources, and paleontological remains. For example, a well-preserved fossil bison was identified in a similar depositional context in Palmer recently. Careful monitoring should be in place at all times with work within the APE.

CVTC requests government to government consultation with Army Corps of Engineers, Alaska District, on this project. To uphold the standards of the Magnuson-Stevens Act and ensure the survival of unique salmon populations for future generations, ACOE has an obligation to be thorough in the evaluation of permit applications for in-water work on anadromous systems. Please contact Stephanie Freeman ([smfreeman@chickaloon-nsn.gov](mailto:smfreeman@chickaloon-nsn.gov)) and 907.745.0749 to schedule a government to government consultation.

May Nek'eltaeni (Creator) Guide Our Footsteps,

  
[Chief Gary Harrison \(Jan 9, 2024 13:44 AKST\)](#)

Chief Gary Harrison  
Chairman