

# 11C1



**HAINES BOROUGH, ALASKA**  
**P.O. BOX 1209, HAINES, ALASKA 99827**  
Annette Kreitzer, Borough Manager  
907.766.6404 akreitzer@haines.ak.us

January 24, 2024

Willie G. Nunn  
Regional Administrator  
FEMA Region 10  
P.O. Box 10055  
Hyattsville, MD 20782-8055

Re: Eligibility Determination Memorandum Appeal, PA ID 100-99100-00,  
FEMA-4585-DR-AK, Project Worksheet (PW) 13 – Porcupine Trail Road

Dear Mr. Nunn,

This letter is in response to the eligibility determination memo (DM) dated December 21, 2023, and received via Grants Portal January 4, 2024. The Haines Borough (Applicant) presents this appeal to the Department of Homeland Security's Federal Emergency Management Agency (FEMA) in response to its denial of funding in the amount of \$1,435,834.75 for costs related to the repair of Porcupine Trail Road.

The DM contains broad generalizations unrepresentative of the project as a whole and unsubstantiated assumptions on which the denial is based. Though not clearly enumerated in the DM, the following claims of non-compliance appear to constitute FEMA's justification for the denial:

1. The work completed by the Applicant exceeded the agreed upon scope of work, and the extraneous work was completed without prior approval by FEMA. This point refers to the claim of road widening.
2. The work completed by a third party constituted a connected action and was completed without prior approval by FEMA. This point refers to alleged connected action work.
3. The work completed by a third party exceeded the agreed-upon scope of work and was completed without prior approval by FEMA. This point refers to assertion of Environmental & Historic Preservation (EHP) noncompliance.

In the following analysis, justification is provided rejecting the claims of the DM and supporting the position of the Applicant. Though the three claims are related and have areas of overlap, each

will be addressed individually to help clearly identify the flaws in FEMA’s determination of ineligibility.

### **FEMA Claim 1: Averred Road Widening**

FEMA claims the Applicant’s work exceeded the agreed-upon scope by widening the roadway beyond the approved 22-foot width. This supposed widening resulted in additional ground disturbance for which a change in scope of work request was not submitted to FEMA, thus depriving FEMA EHP of the opportunity to review for compliance with federal environmental and historic preservation requirements, particularly Section 106.

#### **Timeline of Applicable Events<sup>1</sup>:**

2/17/2021	Federal disaster declaration.
6/30/2021	Applicant expresses interest in performing permanent repairs to Porcupine Trail Road.
8/26/2021	FEMA performs initial site inspection for Porcupine Trail Road with Applicant and State of Alaska Representatives. During the inspection, FEMA takes all measurements for developing the Damage Description and Dimensions (DDD) captured in the Site Inspection Report (SIR).
7/14/2022	Applicant and State of Alaska DMVA (Recipient) submit SOW change request to separate Porcupine Trail Road into three phases.
7/20/2022	Consolidated Resource Center (CRC) and EHP comment on the SOW change request, stating Phase I work will “reestablish ditches and repair the surface of the roadway in the existing footprint.”
7/21/2022	FEMA requests clarification on limits of work for SOW change request that includes limits shown from back of existing ditch to back of existing ditch.
8/5/2022	FEMA sends letter to AK SHPO with determination of “No Adverse Effects to Historic Properties.”
8/9/2022	AK SHPO provides concurrence with FEMA finding “no historic properties adversely affected.”
10/21/2022	FEMA obligates \$1,398,659.75 for Phase I.
6/14/2023	Phase I reconditioning begins.
7/13/2023	Phase I reconditioning complete.
7/20/2023	The Applicant pays the Contractor in full for Phase I.
7/24/2023	FEMA receives email from Takshanuk Watershed Council (TWC) expressing concerns about Phase I work.
8/31/2023	FEMA performs follow-up site inspection for Porcupine Trail Road.
9/20/2023	FEMA EHP submits Request for Information (RFI) for Porcupine Trail Road.
10/10/2023	Applicant provides response to EHP RFI.
10/30/2023	FEMA informs the Applicant that the project funding will be deobligated.
12/12/2023	Porcupine Trail Road funding is deobligated.
1/4/2024	Applicant receives DM denying eligibility.

#### **Applicant’s Position:**

All Phase I work completed by the Applicant was within the agreed upon scope of work and did not increase the amount of ground disturbance. Inconsistent definitions, poor communication, repeated staff turnover within FEMA’s management team, and misunderstanding between

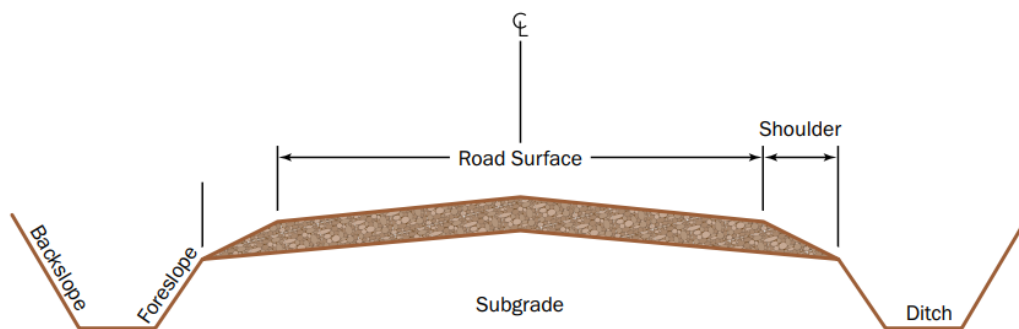
FEMA site inspectors and EHP resulted in EHP's erroneous analysis of the approved scope of work.

**Justification:**

The DM repeatedly references a road width of 22 feet, a measurement taken during the initial FEMA site visit and subsequently documented in the original site inspection report (SIR)<sup>2</sup>. EHP uses this 22-foot measurement as the basis for its SOW increase/road widening claim, an assumption that is invalid for several reasons:

1. This measurement was not performed by a licensed or qualified surveyor and should not be considered a baseline survey.
2. This measurement is a broad generalization of the SOW and is unrepresentative of the actual pre-existing site conditions. A gravel road is by nature unconfined, resulting in variable widths as determined by the construction equipment used, site constraints, materials available, and many other factors. Therefore, the single 22-foot measurement taken during the original SIR at one distinct location along a 7-mile road is not an accurate or representative measurement that can be applied to the entire road length.
3. This measurement in no way captures the entire agreed upon scope of work as identified in the FEMA SIR<sup>2</sup>, Applicant SOW documents<sup>3</sup>, or other project documentation. The 22-foot measurement taken during the original SIR only captured the road surface and did not incorporate the width of the shoulder or ditches. Several federal roadway standards<sup>4,5</sup> – including the FEMA PA policy guide<sup>6</sup> – draw a clear distinction between the width of the road surface, the width of the shoulder, and the width of the ditch; they are finite features (see figure below). This distinction is critical, because the measurements taken during the follow-up FEMA site visit and subsequently documented in the SIR<sup>7</sup> attached to the DM show all road surface measurements as *less than* 22 feet. The road could therefore only be interpreted as widened when the shoulder width is added to the road surface width.

FEMA's claim in the DM that *"the average width of the road (including the shoulders...) significantly increased the area of ground disturbance... beyond the FEMA approved scope of work"* relies on a broad generalization of the scope of work and makes an unsubstantiated assumption that the road surface includes the shoulders. This assumption not only defies industry standards of measurement, it goes against the definitions and distinctions put forth in FEMA's own policy guides.



**Source:** FEMA Hurricane and Flood Mitigation Handbook for Public Facilities - Fact Sheet 1.1: Road and Highway Surfaces

Additional justification for the Applicant can be found in email correspondence between the Applicant and FEMA<sup>8</sup> where it was clearly identified that the limits of work, as shown on the design drawings, included the 22-foot-wide road surfacing, variable width shoulder, and variable width ditches. It was also noted on the FEMA-approved plans that the existing road width varies. The Applicant also provided FEMA with documented correspondence between the Contractor and the Applicant<sup>9</sup> during bidding, where clarification was requested regarding the limits of work. The Applicant clearly outlines that the intent of the project is not to widen the road. “Our intent is for the reconditioned road surface to match the existing road surface up to 22 feet wide. Where the existing road surface is less than 22 feet wide, we do not intend to widen the [road] but recondition to match the narrower road.” The work completed did not require any structural fill or road base material and was limited to the reconstruction of the existing roadway.

**Conclusion:**

The Applicant believes EHP is erroneously claiming unapproved SOW changes in the form of a widened roadway in response to concerns raised by the public and the Chilkat Indian Village (Klukwan). The above analysis and provided documentation demonstrate not only that a SOW change did not occur, but that the Applicant understood and enforced construction of the existing SOW consistent with federal guidelines. Any compliance lapses concerning federal environmental and historic preservation requirements are the result of EHP’s misunderstanding of the scope of work. This is a shortcoming of EHP procedures and should not penalize the Applicant.

**FEMA Claim 2: Alleged Connected Action Work**

FEMA claims the Applicant allowed third-party work to be performed that qualified as a connected action. FEMA is responsible for reviewing connected actions associated with a proposed project, even if the connected action is independently funded.

**Timeline of Applicable Events:**

- 2/17/2021 Federal disaster declaration.
- 6/28/2021 Porcupine Trail Road is actively washing out.
- 6/30/2021 Applicant expresses interest in performing permanent repairs to Porcupine Trail Road.
- 7/5/2021 Temporary Emergency Bypass Road installed as Category B (Cat B) work.
- 8/26/2021 FEMA performs initial site inspection of Porcupine Trail Road with Applicant and State of Alaska Representatives. During the inspection, FEMA takes all measurements for developing the Damage Description and Dimensions (DDD) captured in the Site Inspection Report (SIR).
- 11/16/2021 Applicant provides memo on Haines Borough regular maintenance activities.
- 1/11/2022 Applicant confirms with FEMA the creation of the new temporary access road adjacent to Site 9 as part of Cat B work.
- 7/14/2022 Applicant and Recipient submit SOW change request to separate Porcupine Trail Road into three phases. Email chain shows archaeological site along Porcupine Trail Road is likely mapped in the wrong location.
- 1/20/2023 Applicant and Recipient submit SOW change request to increase funding to include Phases II and III construction.
- 5/31/2023 - 6/13/2023 Third-party work performed. Temporary emergency repair.
- 6/14/2023 Phase I reconditioning begins.

7/13/2023 Phase I reconditioning complete.  
8/31/2023 FEMA performs follow up site inspection for Porcupine Trail Road.  
9/20/2023 FEMA EHP submits RFI for Porcupine Trail Road.  
10/10/2023 Applicant provides response to EHP RFI.  
12/12/2023 Porcupine Trail Road funding is deobligated.  
1/4/2024 Applicant receives DM denying eligibility.

**Applicant's Position:**

The temporary emergency repair work completed by the third party on Porcupine Trail Road does not meet the requirements of a connected action and therefore did not require a FEMA review.

**Justification:**

The DM asserts that the third-party work was connected to the FEMA approved SOW and references the applicable federal code, but fails to describe or substantiate how the third party work rises to the level of a connected action as outlined under federal code<sup>10</sup>.

In federal code, an activity is defined as a connected action if it meets the following requirements:

- i. Automatically trigger other actions.
- ii. Cannot or will not proceed unless other actions are taken previously or simultaneously.
- iii. Are interdependent parts of a larger action and depend on the larger action for their justification.

In FEMA's DM, the Subject Action (the work in contention) is broadly identified as road repairs paid for and performed by a third party. No other scope, activity, or detail is offered to characterize the Subject Action that FEMA is objecting to. The Applicant is therefore forced to draw its own conclusions about the specific nature of the Subject Action, which for the purposes of this appeal we identify as temporary emergency work consisting of placement and grading of roadway material that was performed and paid for by a third party. For the following reasons (corresponding to the requirements above), the Subject Action does not amount to a connected action:

- i. No FEMA approved SOW or actions were triggered by the Subject Action.
  - a. The Phase I SOW was planned, designed, reviewed, and obligated without input from the Subject Action and was triggered specifically by the 2020 flood event.
- ii. The Subject Action proceeded independently of the FEMA approved SOW or action. The FEMA approved SOW or action was not taken previously or simultaneously.
  - a. The Phase I SOW did not affect the Subject Action's ability to proceed. The Phase I SOW was completed after the Subject Action.
- iii. The Subject Action is a part of a larger action, but it does not depend on the larger action for its justification.
  - a. The Subject Action is located along the same road corridor as the FEMA action performed on Porcupine Trail Road for Phase I SOW but does not depend on the

FEMA actions for justification. The Subject action maintains independent justification hence the third-party work and independent funding.

**Conclusion:**

FEMA’s claim in the DM that “road sections worked on by the third party that were authorized by the applicant are connected actions and must be considered and reviewed by FEMA EHP prior to construction” fails to identify any specific way that the Subject Action met these federal code requirements to elevate it to the level of connected action. It is therefore a fallacious argument to claim that such an action must be considered and reviewed by FEMA EHP.

The requirements necessary for identifying an action as a connected action are clearly and specifically defined in federal code. If the connected action claim were defensible, FEMA easily could have cited specific ways that the Subject Action met any or all of the three requirements. Instead FEMA chose to be vague in its assertion.

Though an action may appear connected due to factors such as physical proximity or scope of work, these alone do not meet the requirements of federal code. The above analysis shows that the work performed by the third party does not meet the requirements of a connected action under federal code. Therefore, review and approval by FEMA was not required for this work.

**FEMA Claim 3: Alleged EHP Non-Compliance**

FEMA claims the Applicant allowed third-party work to be performed exceeding the agreed upon scope of work. This allegedly resulted in additional ground disturbance for which a change in scope of work request was not submitted, depriving FEMA EHP of the opportunity to review for compliance with federal environmental and historic preservation requirements, in particular Section 106.

**Timeline of Applicable Events:**

- 2/17/2021 Federal disaster declaration.
- 6/28/2021 Porcupine Trail Road is actively washing out.
- 6/30/2021 Applicant expresses interest in performing permanent repairs to Porcupine Trail Road.
- 7/5/2021 Temporary Emergency Bypass Road installed as Cat B work.
- 8/26/2021 FEMA performs initial site inspection for Porcupine Trail Road with Applicant and State of Alaska Representatives. During the inspection, FEMA takes all measurements for developing the Damage Description and Dimensions (DDD) captured in the Site Inspection Report (SIR).
- 11/16/2021 Applicant provides memo on Haines Borough regular maintenance activities.
- 1/11/2022 Applicant confirms with FEMA the creation of the new temporary access road adjacent to Site 9 as part of Cat B work.
- 5/18/2022 Original EHP REC completed for Cat B work, including Porcupine Trail Road.
- 7/14/2022 Applicant and Recipient submit SOW change request to separate Porcupine Trail Road into three phases. Email chain shows archaeological site along Porcupine Trail Road is likely mapped in the wrong location.
- 8/5/2022 FEMA sends letter to AK SHPO with determination of “No Adverse Effects to Historic Properties.”
- 8/9/2022 AK SHPO provides concurrence with FEMA finding “no historic properties adversely affected.”

8/19/2022 Updated EHP REC to add Version 2 for Phase I SOW.  
 1/20/2023 Applicant and Recipient submit SOW change request to increase funding to include Phases II and III construction.  
 5/31/2023 - 6/13/2023 Third-party work performed. Temporary emergency repair.  
 6/14/2023 Phase I reconditioning begins.  
 7/13/2023 Phase I reconditioning complete.  
 8/31/2023 FEMA performs follow up site inspection for Porcupine Trail Road.  
 9/20/2023 FEMA EHP submits RFI for Porcupine Trail Road.  
 10/10/2023 Applicant provides response to EHP RFI.  
 12/12/2023 Porcupine Trail Road funding is deobligated.  
 1/4/2024 Applicant receives DM denying eligibility.

**Applicant’s Position:**

The temporary emergency repair work completed by a third party on Porcupine Trail Road qualified for the National Historic Preservation Act (NEPA) Categorical Exclusion (CATEX) and complied with all other local, state, and federal statutes, regulations, and executive orders related to environmental and historic preservation. If an EHP review had been performed in a timely manner all work would have been found to be compliant. The failure of FEMA to coordinate and consult with the Chilkat Indian Village (Klukwan) was a result of flawed EHP procedures, not any shortcoming or negligence of the Applicant.

**Justification:**

The SOW of the third-party temporary emergency repair work performed was extremely limited and all work was contained within the existing road corridor. No excavation was performed as part of this work and the only earth-disturbing activity was the placement of fill material directly on the preexisting road surface. This work did not involve changes in the location, footprint, alignment or size of the facility and therefore would be excluded from NEPA review<sup>11</sup>. This work also qualifies for CATEX as there is little or no impact on the environment and there are no “extraordinary circumstances” as defined by DHS<sup>12</sup>.

The third-party temporary emergency repair work was performed to make the road passable for the season. It also had the secondary benefit of protecting the Herman Creek salmon spawning beds, a high-value salmon resource, from the river during the summer of 2023. Additionally, the entirety of the Porcupine Trail Road had a Record of Environmental Consideration (REC) performed as part of the Cat B emergency protective measures<sup>13</sup>. The limits of the third-party work were contained within the GPS coordinates listed on the Cat B REC. This REC performed complete reviews for the Clean Air Act (CAA), Coastal Barrier Resources Act (CBRA), Clean Water Act (CWA), Executive Order 11988 – Floodplains, Executive Order 11990 – Wetlands, Executive Order 12989 – Environmental Justice for Low Income and Minority Populations, Endangered Species Act (ESA), Farmland Protection Policy Act (FPPA), Fish and Wildlife Coordination Act (FWCA), Migratory Bird Treaty Act (MBTA), Magnuson-Stevens Fishery Conservation and Management Act (MSA), National Historic Preservation Act (NHPA), and Wild and Scenic Rivers Act (WSRA). Similarly, a REC was performed for Phase I work<sup>14</sup>. Though the limits indicated on the REC are specifically for the Phase I SOW, there is correspondence between FEMA Regional Environmental Officer Science Kilner, with State Historic Preservation Officer Judith Bittner

clearly indicating no historical or cultural sites of significance would have been identified within the “Area of Potential Effects” (an area 7.5 miles long by 50-100-feet wide that encompasses all segments for road, ditch, and embankment repair)<sup>15,16</sup>. The third-party work was contained within this “Area of Potential Effects”.

The Applicant also submitted a SOW change request in January 2023 for the inclusion of Phases II and III work. If FEMA EHP had performed a timely review, a revised REC would have been performed specifically for the locations where the third-party work was performed prior to construction. It stands to reason that this revised REC, with its overlapping GPS coordinates, would have resulted in the same findings of full compliance as the Cat B REC and the Phase I REC.

Neither the Cat B REC nor the Phase I REC identified historic or cultural sites of significance. As such, even if there had been complete and thorough review by EHP, no procedural mechanism would have dictated FEMA contact the Chilkat Indian Village (Klukwan) to learn of the ancestral and contemporary areas of interest or concern. This is not to say sites do not exist in the area, but rather to make the point that even if FEMA EHP had been given the opportunity to review the third-party work prior to the work being performed, FEMA EHP review procedures would not have resulted in the identification of these sites.

### **Conclusion:**

The scope and limit of the third-party temporary emergency repair work was in compliance with all local, state, and federal statutes, regulations, and executive orders related to environmental and historic preservation. This can be observed both by looking at the impacts of the work itself, as well as comparing the limits of the third-party temporary emergency repair work to the limits of the REC performed for both the Cat B work and the Phase I work. Additionally, if FEMA EHP had performed a timely review based on the Applicant’s SOW change request, a REC would have been available and shown full compliance with the third-party work performed. The historic sites identified by Chilkat Indian Village (Klukwan) would not have been identified by the FEMA EHP review procedures and would only have been identified after the fact.

Similar to their strategy in Claim 2: Alleged Connected Action work, FEMA cites applicable federal code in the DM but fails to specify how any project action or work violated that code. The DM states, “*Work completed was found to not meet provisions of National Environmental Policy Act (NEPA Categorical Exclusions (CATEXs)), as defined in 40 C.F.R. § 1508.4.* As a result, FEMA has determined that the project is ineligible for reimbursement,” but no further rationale is given. Asserting that “work completed was found to not meet provisions” but declining to elaborate on those findings is irresponsible and alarming, especially when such an unsubstantiated pronouncement could result in a small community losing nearly \$1.5 million dollars.

### **Summary Conclusion**

To summarize this appeal, the Applicant does not believe that EHP fully understands the SOW for this project, and the DM does not provide sufficient justification or support for the denial of eligibility for this project. The DM continually references applicable statutes, regulations, and policies, but does not fully explain or provide examples of how the project is not in compliance with these statutes, regulations, or policies.

The Applicant has been through a federally declared disaster and has been operating in good faith throughout the public assistance process. FEMA has denied our eligibility and funding, after the community has already paid for and completed the repairs.



FEMA seems to be taking a hard line on this determination and there are some areas of justification that are not being consistently applied. No record could be found or historical knowledge uncovered of a project being denied eligibility based on a connected action. FEMA makes a clear point in its eligibility requirements regarding the historical enforcement of codes and standards, yet is using a previously unenforced code to deny eligibility for temporary emergency repair work performed by a third party. Additionally, the FEMA Policy Guide permits disallowing all or part of the costs of a project if found out of compliance. The decision to deny in full without adequate justification is an indication that specific impacts of concern could not be identified.

We believe that this DM was a direct response from FEMA EHP to appease members of the public who submitted comments objecting to this work. These concerns are questionable and likely unrelated to the project in question..

FEMA completely deobligated this project and issued a DM without addressing the RFI responses or requesting additional clarification. There are many statements of uncertainty and misunderstandings outlined in the DM that could have been clarified or better understood if The Borough had been given the opportunity for further discussions and sharing of information with FEMA. We ask that, in considering this matter, FEMA reflect on its core values: compassion, fairness, integrity and respect.

We hope that you take this opportunity to thoroughly review the information we have provided and provide an eligibility determination that is accurate, fact-based, substantiated, and reflective of FEMA's values.

Sincerely,



Annette Kreitzer

Haines Borough Manager

CC: Mayor Tom Morphet

Haines Borough Assembly Members

Ed Coffland, P.E., Haines Borough Public Facilities Director

Annelise Silk, Haines Borough Grants & Contracts Administrator

Jenny Belanger, State of Alaska DMVA, DHS&EM

Mike Macans, State of Alaska DMVA, DHS&EM

Alan Cavallo, State of Alaska DMVA, DHS&EM

Garret Gladsjo, P.E., proHNS LLC Principal Engineer

### **Attachments**

<sup>1</sup> Attachment A – Porcupine Trail Road Project Timeline.pdf

<sup>2</sup> Attachment B – DR4585-AK Haines Borough\_WO 71856\_DI553459\_SIR.pdf

<sup>3</sup> Attachment C – Porcupine Trail Road - Phase I Plans

<sup>7</sup> Attachment D – EHP Site Inspection Report.pdf

<sup>8</sup> Attachment E – RE\_DR-4585 Haines PW 0013 SOW Change Request.pdf

<sup>9</sup> Attachment F – Q\_and\_A\_HB 22-12

<sup>13</sup> Attachment G – PA-10-AK-4585-PW-00043\_REC 20230621 rework.pdf

<sup>14</sup> Attachment H – PA-10-AK-4585-PW-00013\_REC\_20231219DeObliation-HMP.pdf

<sup>15</sup> Attachment I – 20220805\_FEMA\_DR4585\_PW13\_PorcupineRdRepair\_SHPO\_consult.pdf

<sup>16</sup> Attachment J – 3130-1R FEMA 2022-00986 Porcupine Road\_2022Aug09.pdf

### **References**

<sup>4</sup> FEMA Hurricane and Flood Mitigation Handbook for Public Facilities, Fact Sheet 1.1: Road and highway Surfaces; Figure 1.1.1.

<sup>5</sup> FHWA Gravel Roads Construction & Maintenance Guide; Section 1.1: Understanding the Gravel Road Cross Section; Figure 1.

<sup>6</sup> PAPPG, at 168

<sup>10</sup> 40 C.F.R. § 1508.25(a)(1)

<sup>11</sup> PAPPG, at 142

<sup>12</sup> PAPPG, at 141

**Porcupine Trail Road Project Timeline**

<b>Year</b>	<b>Date</b>	<b>Description</b>	<b>Reference</b>
2020	11/30/2020-12/2/2020	Disaster Event	
	12/2/2020	Haines Borough Disaster Declaration	
	12/5/2020	State of Alaska Disaster Declaration	
2021	2/17/2021	Federal Disaster Declaration	
	6/11/2021	Applicant indicates expresses interest to add Porcupine Trail Road as Emergency Access.	181119: Project comments J. Jackson
	6/28/2021	Porcupine Trail Road is actively washing out.	4375787: Document: Porcupine Road – Picture – Post Flooding
	6/30/2021	Applicant expresses interest in performing permanent repairs to Porcupine Trail Road.	181119: Document: FEMA Follow-Up Meeting Minutes
	7/2/2021	Email from Constantine documenting loss of access via porcupine road is eminent.	181119: Email dated 7/2/2021 (From: Constantine, To: HB, SERB)
	7/5/2021	Temporary Emergency Bypass Road installed as Category B (Cat B) work.	181119: Email dated 7/7/2021 (From: SERB, To: HB) 181119: Document: Invoice dated 7/30/2021
	8/26/2021	FEMA performs initial site inspection for Porcupine Trail Road with Applicant and State of Alaska Representatives. During the inspection, FEMA takes all measurements for developing the Damage Description and Dimensions (DDD) captured in the Site Inspection Report (SIR).	437587: Document: DI 553459 SIR 437587: Document: DI 553459 Photo Page 437587: Document: DI 553459 Location Map 437587: Document: DI 553459 Flood Map
	8/27/2021	Applicant provides memo on Haines Borough regular maintenance activities.	437587: Document: Porcupine Road – NOAA Atlas 14 Precipitation Frequency Values
	11/16/2021	Applicant provides memo on Haines Borough regular maintenance activities.	437587: Document: Porcupine Maintenance

2022	1/11/2022	Applicant confirms with FEMA the creation of the new temporary access road adjacent to site 9 as part of Cat B work.	437587: Document: Porcupine Road Current Understanding
	1/21/2022	Original EHP REC for V0 A&E	437587: Document: PA-10-AK-4585-PW-00013_REC(1)
	2/1/2022	Revision to original EHP REC for V0 A&E	437587: Document: PA-10-AK-4585-PW-00013_REC(2)
	5/18/2022	Original EHP REC for Cat B work, including Porcupine Trail Road	181119: Document: PA-10-AK-4585-PW-00043_REC
	6/8/2022	Recipient submits SOW change for revised project GPS coordinates to FEMA.	437587: Email dated 6/8/2022 (From: DMVA, To: FEMA, Cc: HB, proHNS)
	6/22/2022	Revised EHP REC for Cat B work, including Porcupine Trail Road	181119: Document: PA-10-AK-4585-PW-00043_REC 20220622 rework
	7/6/2022	FEMA follow-up meeting agenda item "Porcupine Road. Update from the field EHP"	437587: Email dated 7/6/2022 (From: FEMA, To: HB, DMVA, proHNS)
	7/14/2022	Applicant and Recipient submit SOW change request to separate into phases and increase funding to include phase 1 construction. Construction plans included. Email chain shows archaeological site along porcupine trail road is likely mapped in the wrong location.	437587: Document: SOW Change Request to FEMA 437587: Document: SOW Change Request-Email Thread
	7/20/2022	CRC and EHP comment on the SOW change request, stating Phase I work will "reestablish ditches and repair the surface of the roadway in the existing footprint."	437587: Project Comments K. Levenstein
	7/21/2022	FEMA requests clarification on limits of work for SOW change request that includes limits shown from back of existing ditch to back of existing ditch.	437587: Email dated 7/21/2022 (From: FEMA, To: DMVA)

	8/5/2022	FEMA sends letter to AK SHPO with determination of “No Adverse Effects to Historic Properties.”	437587: Email dated 8/5/2022 (From: FEMA, To: DNR)
	8/9/2022	AK SHPO provides concurrence with FEMA finding “no historic properties adversely affected.”	437587: Email dated 8/9/2022 (From: DNR, To: FEMA)
	8/9/2022	FEMA follow-up meeting agenda item “Porcupine Road. Update from the field EHP, pending EHP review.”	437587: Email dated 8/9/2022 (From: FEMA, To: HB, DMVA, Cc: proHNS)
	8/19/2022	Updated EHP REC to add Version 2 for Phase I SOW.	437587: Document: PA-10-AK-4585-PW-00013_REC(3)
	8/22/2022	FEMA project status for Porcupine Trail Road “Final FEMA Review.”	437587: Email dated 8/22/2022 (From: HB, To: proHNS, DMVA)
	10/21/2022	FEMA obligates \$1,398,659.75 for Phase I.	437587: Grants Portal, Award Information
	12/9/2022	ADFG issues FHP FH22-I-0090 for work in Klehini River	Permit dated 12/9/2022
2023	1/20/2023	Applicant and Recipient submit SOW change request to increase funding to include Phases II and III construction.	437587: Email dated 1/20/2023 (From: HB, To: DMVA, Cc:proHNS)
	4/28/2023	EHP provides guidance on phase II & II considerations via email from Molly Parkan.	437587: Email dated 4/28/2023 (From: FEMA, To: proHNS, Cc: HB, DMVA)
	5/4/2023	FEMA follow-up meeting agenda item “Porcupine Trail Road. EHP Compliance ~Laura Herriott.”	437587: Email dated 5/4/2023 (From: FEMA, To: HB, proHNS, Cc: DMVA)
	5/31/2023 – 6/13/2023	Third party work performed. Temporary emergency repair.	Email dated 9/20/2023 (From: SERB, To: proHNS)
	6/14/2023	Phase I reconditioning begins.	437587: Email dated 6/20/2023 (From: proHNS, To: HB)

	6/21/2023	Revised EHP REC for Cat B work, including Porcupine Trail Road	181119: Document: PA-10-AK-4585-PW-00043_REC 20230621 rework
	7/13/2023	Phase I reconditioning complete.	437587: Email dated 7/17/2023 (From: proHNS, To: SERB, Cc: HB)
	7/20/2023	The Applicant pays the Contractor in full for Phase I.	437587: HB, Expenditures
	7/24/2023	FEMA receives email from Takshanuk Watershed Council (TWC) expressing concerns about Phase I work.	437587: Document: Email from Watershed Group
	8/10/2023	HB submits reimbursement request to State.	437587: Email dated 8/10/2023 (From: HB, To: DMVA, Cc: proHNS)
	8/31/2023	FEMA performs follow up site inspection for Porcupine Trail Road.	437587: Document: EHP Site Inspection Report
	9/19/2023	Met with State and FEMA leadership to discuss issues with project and how to move forward to reach compliance.	437587: Project Comments K. Rose
	9/20/2023	FEMA EHP submits RFI for Porcupine Trail Road.	437587: Email dated 9/20/2023 (From: FEMA, To: DMVA)
	9/21/2023	Updated EHP to de-obligate project.	437587: Document: PA-10-AK-4585-PW-00013_REC_20231219DeObligation-HMP
	10/10/2023	Applicant provides response to EHP RFI.	437587: Email dated 10/10/2023 (From: proHNS, To: DMVA, HB)
	10/30/2023	FEMA informs the Applicant that the project funding will be deobligated.	437587: Teams Meeting (attendees: FEMA, DMVA, HB, proHNS)
	12/12/2023	Porcupine Trail Road funding is deobligated.	437587: Project Comments K. Rose
	12/22/2023	Draft determination memo sent to HB.	437587: Email dated 12/22/2023 (From: FEMA, To: HB, Cc: DMVA)
2024	1/04/2024	Applicant receives DM denying eligibility.	437587: Grant Portal Notification

Records Needed:  
 Pre-DR condition  
 Post-DR repair

## SITE INSPECTION REPORT

### CATEGORY C – ROAD-LOW WATER CROSSING

Porcupine Road-

Applicant <b>Haines Borough</b>	PA ID # <b>100-99100-00</b>	Applicant Representative <b>Ecl Coffland</b>	Applicant Representative Title <b>Public Works Director</b>
Site Inspection Date <b>Aug 26, 2021</b>		Site Inspector Name <b>Glenn Lewis</b>	
Work Order # <b>71856</b>		Damage # <b>553459</b>	
Facility: <input checked="" type="checkbox"/> Road <input type="checkbox"/> Low Water Crossing			
GPS Start Latitude <del>59.412208</del> <b>59.412354</b>		GPS Start Longitude <del>-136.024685</del> <b>-136.029592</b>	
GPS End Latitude <del>59.420100</del> <b>59.42065</b>		GPS End Longitude <del>-136.121906</del> <b>-136.19023</b>	
NOTE: All damaged facilities longer than 200 linear feet require coordinates for both endpoints.			
Date Damaged <b>11-30-2020 - 12-2-2020</b>		Age of Facility <input type="checkbox"/> Exact <input checked="" type="checkbox"/> Approximate Year Built: <b>1940</b>	Legal Responsibility <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Road Type: <input type="checkbox"/> Asphalt <input type="checkbox"/> Concrete <input type="checkbox"/> Composite <input type="checkbox"/> Chip & Seal <input type="checkbox"/> Dirt <input checked="" type="checkbox"/> Gravel	Dimensions Length: <b>7 miles</b> Width: <b>22ft</b>	Number of Lanes <b>2 Lane gravel road.</b>  Applicant states Borough maintains this access road to resources (timber, fish, gold mine, RECREATION)  <b>8/27/21 needed</b> Post Disaster Restoration Performed. Documents to establish extent of repair performed. 2nd incident High Water (flooding) INCIDENTS, PHOTOS, MAINTENANCE RECORDS. June-July 2021.  per Applicant permanent repairs from Nov/Dec 2020 Event had not been done before June/July 2021 new flooding - pending review of emails & documentation in GP	

Applicant Representative Signature: *Glenn Lewis*

Recipient Authorized Representative Signature (if applicable): *[Signature]*

For FEMA Use Only

Work Order # (if applicable) 71856 Damage # 553459

Facility Description: (Pre-disaster design, function, capacity, dimensions, and footprint)

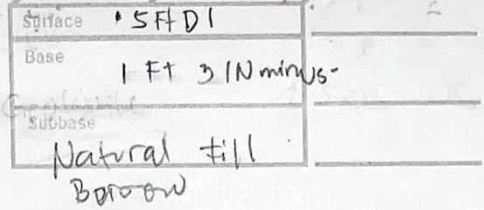
Facility Description Only

Describe embankments / slopes / ditches

SKETCH: (Click box to upload an image)

Layers

Easement



NOTES:

Applicant Representative Initials: ECW

Recipient Authorized Representative Initials (if applicable): DL



Category

EMA Use Only

Work Order # (if applicable) 71856 Damage # 553459

Category C

Facility Component Damages

Site #	Damage Component Material/Model/Type/Capacity	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
1	Surface D-1 71% of the area	<del>59.412240</del> <del>-136.029598</del>	(5 Miles) 26.340 FT x 22ftw x .5ftD
Method of Repair (change in design, materials, size, capacity etc.)			1

Start GPS: 59.412354, -136.029592  
End GPS: 59.42115, -136.17052

Replace D-1 surface washed out  
By flood waters

FA	<input type="checkbox"/>	Quantity	10,755.55
CTR	<input checked="" type="checkbox"/>	Units	CY
Both	<input type="checkbox"/>	% Complete	0

Site #	Damage Component Material/Model/Type/Capacity	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
2	Drainage Ditch/d	<del>59.412240</del> <del>-136.029598</del>	(34,320) 6.5 miles Long / 3ft wide x 2 foot deep
Method of Repair (change in design, materials, size, capacity etc.)			1

Start GPS: 59.412354, -136.029592  
End GPS 59.414725, -136.103092

30% of Road has drainage on  
2 sides

30% of ditches on both sides of road contains  
washed out road fill requiring removal and  
needs to be re-established

FA	<input type="checkbox"/>	Quantity	7,626
CTR	<input checked="" type="checkbox"/>	Units	CY
Both	<input type="checkbox"/>	% Complete	0

Site #	Material	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
3	Slope Embankment #1	59.42065 -136.19023	30ft L x 16ftw x 30ftD
Method of Repair (change in design, materials, size, capacity etc.)			1

-pull GPS not google maps  
• Length of Road 18ft wide  
• 2ft from road from drop

Site 3 embankment has  
severe erosion due to flood  
waters washout destabilizing  
edge of roadway.

FA	<input type="checkbox"/>	Quantity	533.33
CTR	<input checked="" type="checkbox"/>	Units	CY
Both	<input type="checkbox"/>	% Complete	0

Site #	Damage Component Material/Model/Type/Capacity	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
4	Slope embankment #2	59.42115 -136.17052	8ft L x 22ftw 40ft x D
Method of Repair (change in design, materials, size, capacity etc.)			1

Length of Road 15ft + 2ft of shoulder

high volume and high velocity surface water flooding  
washed out embankment destabilizing edge of roadway

FA	<input type="checkbox"/>	Quantity	260.74
CTR	<input checked="" type="checkbox"/>	Units	CY
Both	<input type="checkbox"/>	% Complete	0

Component Types: 1 - Surface 2 - Base 3 - Sub Base 4 - Shoulder  
5 - Ditch 6 - Striping 7 - Embankment 8 - Sidewalk 9 - Curb 10 -  
Median 11 - Guardrail 12 - Lighting 13 - Signage 14 - Culvert 15 -  
Wall 16 - Armor 17-Retaining Wall 18 - Other (specify)

Cause of Damage: 1 - Surface water flooding 2 -  
Wind Driven Rain 3 - Sewer Back up 4 - Foundation  
Seepage 5 - Lightning 6 - High Winds 7 - Tree  
Damage 8 - Wind Blown Debris 9 - Earthquake 10 -  
Fire 11 - Explosion 12 Other (Specify)

Applicant Representative Initials: [Signature]

Recipient Authorized Representative Initials (if applicable): [Signature]

For FEMA Use Only  
 Work Order # (if applicable) 71856 Damage # 553459

Category FEMA Use O  
 Work Order # Site

Facility Component Damages

Site #	Damage Component Material/Model/Type/Capacity	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
5	Slope embankment #3	59.421307 -136.169618	16ft L x 16ft W x 25ft D

Method of Repair (change in design, materials, size, capacity etc.)	Cause of Damage	1	
Slope Restabilization <u>high volume and high velocity surface water flooding washed out embankment destabilizing edge of roadway.</u>	FA <input type="checkbox"/>	Quantity	88.88
	CTR <input checked="" type="checkbox"/>	Units	CY
	Both <input type="checkbox"/>	% Complete	0

Site #	Damage Component Material/Model/Type/Capacity	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
6	Slope embankment #4	59.421280 -136.149301	8ft L x 22ft W x 19ft D

Method of Repair (change in design, materials, size, capacity etc.)	Cause of Damage	1	
Road width 20ft <u>high volume and high velocity surface water flooding washed out embankment destabilizing edge of roadway</u>	FA <input type="checkbox"/>	Quantity	123.85
	CTR <input checked="" type="checkbox"/>	Units	CY
	Both <input type="checkbox"/>	% Complete	0

Site #	Damage Component Material/Model/Type/Capacity	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
7	Slope embankment #5	59.421530 -136.169010	20ft L x 50ft W x 30ft D

Method of Repair (change in design, materials, size, capacity etc.)	Cause of Damage	1	
Rd width 21ft <u>high volume and high velocity surface water flooding washed out embankment destabilizing edge of roadway</u>	FA <input type="checkbox"/>	Quantity	1,111.11
	CTR <input checked="" type="checkbox"/>	Units	CY
	Both <input type="checkbox"/>	% Complete	0

Site #	Damage Component Material/Model/Type/Capacity	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
8	Slope embankment #6	59.421193 -136.168441	30ft L x 33ft W x 37ft D

Method of Repair (change in design, materials, size, capacity etc.)	Cause of Damage	1	
Rd Width 16ft <u>high volume and high velocity surface water flooding washed out embankment destabilizing edge of roadway</u>	FA <input type="checkbox"/>	Quantity	1356.66
	CTR <input checked="" type="checkbox"/>	Units	CY
	Both <input type="checkbox"/>	% Complete	0

Component Types: 1 - Surface 2 - Base 3 - Sub Base 4 - Shoulder 5 - Ditch 6 - Striping 7 - Embankment 8 - Sidewalk 9 - Curb 10 - Median 11 - Guardrail 12 - Lighting 13 - Signage 14 - Culvert 15 - Wall 16 - Armor 17 - Retaining Wall 18 - Other (specify)

Cause of Damage: 1 - Surface water flooding 2 - Wind Driven Rain 3 - Sewer Back up 4 - Foundation Seepage 5 - Lightning 6 - High Winds 7 - Tree Damage 8 - Wind Blown Debris 9 - Earthquake 10 - Fire 11 - Explosion 12 Other (Specify)

Applicant Representative Initials: ELC

Recipient Authorized Representative Initials (if applicable): AK

Work Order # (if applicable) 71856 Damage # 553459

Facility Component Damages

Site #	Damage Component Material/Model/Type/Capacity	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
9	Road washout Base	START 59.41416 136.08804 END 59.41430 136.08552	636 FT L X 20 FT W X 7 FT D
Method of Repair (change in design, materials, size, capacity etc.)			Cause of Damage
Replace Base In/End			1
			FA <input type="checkbox"/> Quantity 471.11
			CTR <input checked="" type="checkbox"/> Units CY
			Both <input type="checkbox"/> % Complete <input checked="" type="checkbox"/>
Site #	Damage Component Material/Model/Type/Capacity	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
9A	Borrow Fill	"	636 FT L X 20 FT W X 2 FT D
Method of Repair (change in design, materials, size, capacity etc.)			Cause of Damage
Replase Borrow Fill			1
			FA <input type="checkbox"/> Quantity 942.22
			CTR <input checked="" type="checkbox"/> Units CY
			Both <input type="checkbox"/> % Complete <input checked="" type="checkbox"/>
Site #	Damage Component Material/Model/Type/Capacity	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
9B	Rip rap Anchor Rock Embankment 24 - 48 IN MINUS	"	636 FT L X 13 FT W X 8 FT D
Method of Repair (change in design, materials, size, capacity etc.)			Cause of Damage
Install Rip Rap			1
			FA <input type="checkbox"/> Quantity 2949.77
			CTR <input checked="" type="checkbox"/> Units CY
			Both <input type="checkbox"/> % Complete <input checked="" type="checkbox"/>
Site #	Damage Component Material/Model/Type/Capacity	Location Address/GPS/begin-end	Damage Dimensions: (L x W x D/L x Dia) Electrical/Mechanical/etc.
	<del>Call for info</del>		<del>9AU</del>
Method of Repair (change in design, materials, size, capacity etc.)			Cause of Damage
			FA <input type="checkbox"/> Quantity
			CTR <input type="checkbox"/> Units
			Both <input type="checkbox"/> % Complete
<p><b>Component Types:</b> 1-Surface 2-Base 3-Sub Base 4-Shoulder 5-Ditch 6-Striping 7-Embankment 8-Sidewalk 9-Curb 10-Median 11-Guardrail 12-Lighting 13-Signage 14-Culvert 15-Wall 16-Armor 17-Retaining Wall 18-Other (specify)</p>			<p><b>Cause of Damage:</b> 1- Surface water flooding 2-Wind Driven Rain 3-Sewer Back up 4-Foundation Seepage 5-Lightning 6-High Winds 7-Tree Damage 8-Wind Blown Debris 9-Earthquake 10- Fire 11-Explosion 12 Other (Specify)</p>

Applicant Representative Initials: ELM

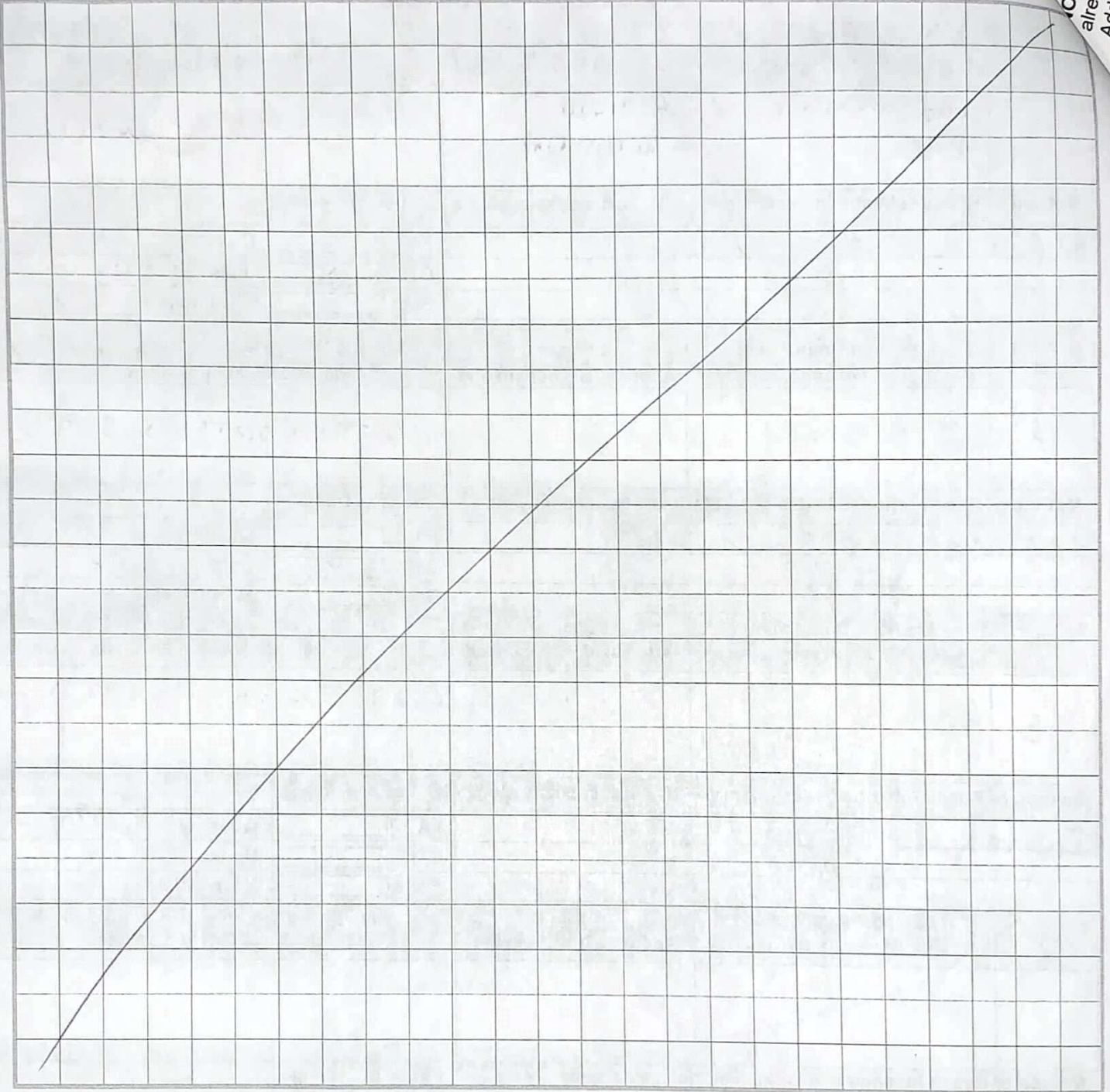
Recipient Authorized Representative Initials (if applicable): DA

For FEMA Use Only

Work Order # (if applicable) 71856 Damage # 55459

Category  
FEMA Use Only  
Work Order #  
NOTE FOR SITE INS  
already asked some c  
Additional Notes sect  
FR

SKETCH: Click grid to upload an image)



NOTES:

Applicant Representative Initials: YSM

Page 6 of 9

Recipient Authorized Representative Initials (if applicable): ML

FEMA Use Only  
Work Order # (if applicable) 71856 Damage # 553459

Category C

**NOTE FOR SITE INSPECTOR:** Please ask the Applicant representative the following questions. Although the PDMG may have already asked some of these questions, the Applicant representative at the site inspection may have additional information. Use the Additional Notes section to record any additional explanation.

**Mitigation Considerations**

FEMA Public Assistance encourages protection of disaster-damaged facilities by providing assistance for cost-effective hazard mitigation measures that reduce or eliminate the risk of similar damage from happening again in a future event. For each question, elaborate on the answer in the space provided for comments.

1. Identify the specific cause of damage (such as water eroded {under the toe and slab, the driving surface, the road at the end of the LWC} or debris blocked the culvert in the LWC, etc.).

Rain water and Sewer flooding caused Road washout

2. What can be done to prevent future damage in a similar event? (check all of interest to the Applicant):

- Form and pour deeper concrete toes along the LWC upstream and downstream edges.
- Anchor the LWC toes with vertical steel rebars in holes drilled into the bedrock.
- Form and pour steel reinforced concrete instead of grouted riprap on the LWC slopes.
- Replace the low-water crossing with a bridge. (Note: A Hydrology & Hydraulic Study will be needed)
- Increase the steel reinforcing in the concrete slab and toes.

Other mitigation (specify): Embankment Stabilization

3. Does the Applicant plan to perform additional work to protect damaged facilities against similar damage in a future event?

- Yes
- No
- Unsure

Comments:

4. Will the Applicant provide a proposal for hazard mitigation work?

- Yes
- No
- Unsure

Comments: Estimate will be provided to PDMG

5. Would the Applicant like FEMA to prepare a proposal for hazard mitigation work?

- Yes
- No
- Unsure

Comments:

Record any additional notes about the Applicant's interest in hazard mitigation opportunities and other relevant information in the space below. This information will be used by hazard mitigation specialists and costing specialists to develop a hazard mitigation proposal (HMP) for the Applicant's consideration. Potential Mitigation Scope of Work: (Include dimensions, quantities and sketches of HMP measures).

The following mitigation measures will help prevent future damage in a similar event:

Embankment Stabilization

Applicant Representative Initials: [Signature]

Page 7 of 9

Recipient Authorized Representative Initials (if applicable): [Signature]

For FEMA Use Only

Work Order # (if applicable) 71856 Damage # 553459

Category C

**Insurance Considerations**

FEMA is legally prohibited from duplicating benefits from other sources and will reduce eligible costs by the amount of insurance proceeds received.

1. Does the damaged facility have insurance coverage and/or is it an insurable risk (e.g., buildings, equipment, vehicles)?

- Yes
- No
- Unsure

Comments:

**Environmental & Historic Preservation Considerations**

FEMA is required to ensure that work complies with applicable environmental and historic preservations laws, regulations, and executive orders.

1. Is the damaged facility(ies) located within a floodplain or a coastal high hazard area and/or does it have an impact on a floodplain or wetland? Can the project site be impacted by flooding? Will work occur within 200 feet of a waterway/waterbody?

- Yes
- No
- Unsure

Comments:

2. Is the damaged facility located within or adjacent to a Coastal Barrier Resource System Unit or an Otherwise Protected Area?

- Yes
- No
- Unsure

Comments:

3. Will the proposed facility repairs/reconstruction change the pre-disaster conditions (e.g., footprint – including depth of footprint, material, location, capacity, use or function), including construction of an access road, establishing a staging area, or other work outside of the constructed right-of-way? If yes, describe changes or work outside of the constructed right-of-way. Provide detailed justification for the change (e.g. codes and standards).

- Yes
- No
- Unsure

Comments:

4. Is the damaged facility(ies) listed on a local/state/national historic register or is it a locally recognized landmark? Is it older than 45 years? (Provide the age of the facility) Are there more, similar buildings near the site?

- Yes
- No
- Unsure

Comments:

5. Are there any large, undeveloped or undisturbed areas on, or near, the project site? (Select "yes" if there are large tracts of forestland, grassland, or naturally preserved areas, etc.)

- Yes
- No
- Unsure

Comments: River and wooded Areas

6. Are there any hazardous materials at or adjacent to the damaged facility?

- Yes
- No
- Unsure

Comments:

Applicant Representative Initials: EMC

Recipient Authorized Representative Initials (if applicable): AK

Category C

FEMA Use Only  
Work Order # (if applicable) 71856 Damage # 533451

Category C

7. Are there any other environmental or controversial issues associated with the damaged facility and/or work item? (select yes if facility is a road maintained by a Tribal Government or if the project necessitates the establishment of a new borrow area or the horizontal expansion of an existing borrow area.)

- Yes
- No
- Unsure

Comments:

8. Are there any known endangered species in the work area?

- Yes
- No
- Unsure

Comments:

**Additional Notes / Comments:**

Slope Embankment #1 has reoccurring slope damage stated by Applicant.

Applicant states that road 636 FT L was washed out by the incident and the river claimed surface, base, riprap & borrow fill.

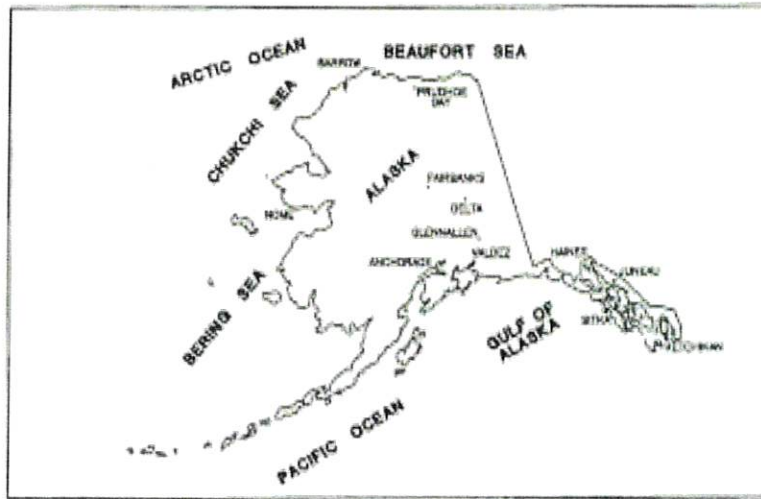
Temporary road was put by Haines Borough 20 FT FROM original road.

\* EHP and mitigation

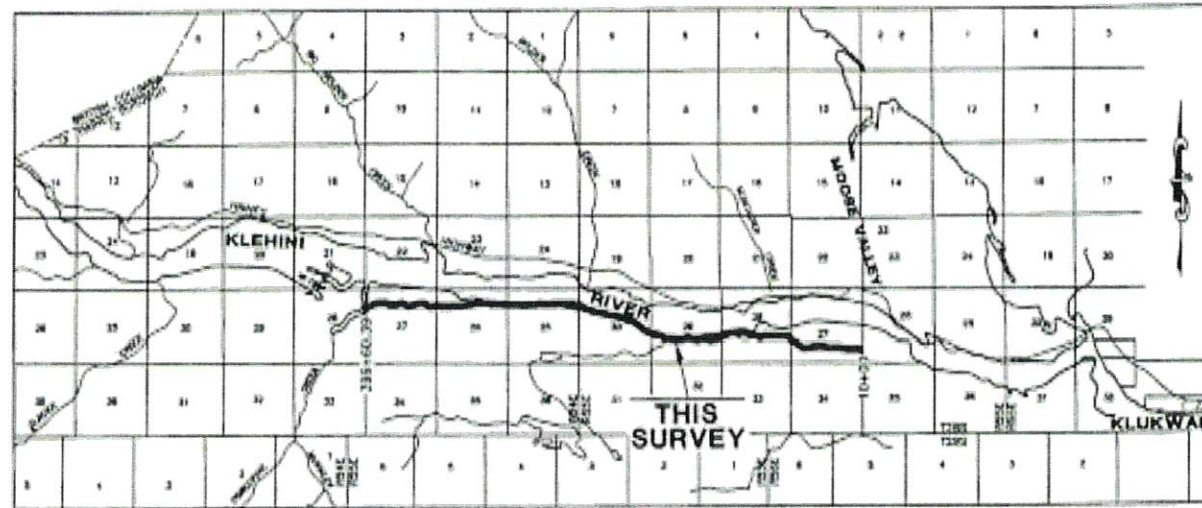
Applicant states that the river continues to ~~erode~~ the road.

Applicant Representative Initials: ELL

Recipient Authorized Representative Initials (if applicable): AK



STATE OF ALASKA  
N.T.S.



VICINITY MAP

SOURCE: U.S.G.S. QUADS "SNAGWAY (B-3 & B-4), 1954, ALASKA" SCALE: 1" = 2 MILES

**A CENTERLINE OF  
PROCUPINE ROAD  
WITHIN HAINES BOROUGH, ALASKA**  
HAINES RECORDING DISTRICT – HAINES, ALASKA

LEGEND

- ⊕ G.L.O./B.L.M. 2-1/2" BRASS MONUMENT RECOVERED THIS SURVEY
- ⊙ PRIMARY MONUMENT RECOVERED THIS SURVEY



Haines Borough  
PO Box 1209  
Haines, Alaska 99827

Tel: (907)766-6400



REVISION

REV	DATE	DESCRIPTION	DWN	CKD
A	MAY 22	ISSUED FOR BIDS	EGC	EGC

**HAINES BOROUGH  
PORCUPINE TRAIL ROAD, PHASE 1  
PROJECT 00013(435787),  
SITES 1 & 2**

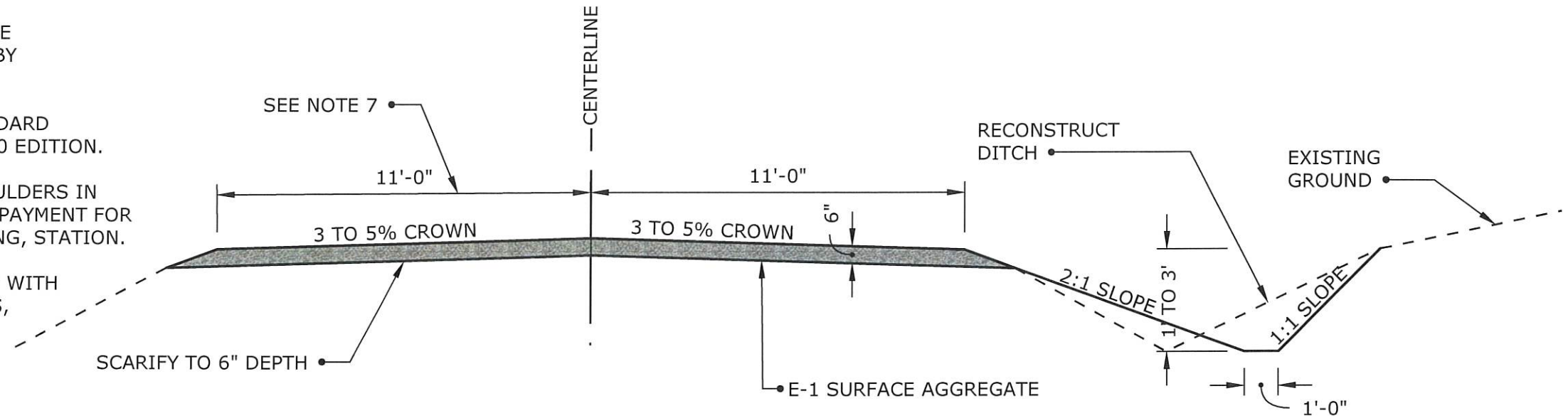
**PROJECT  
LOCATION**

**C01**



NOTES:

1. THIS WORK INCLUDES UP TO 5 MILES OF SURFACE RECONDITIONING AND UP TO 6.5 MILES OF DITCH RECONDITIONING. AREAS OF PORCUPINE ROAD TO BE RECONDITIONED WILL BE MARKED ON THE GROUND BY THE OWNER WITH SURVEY LATHE AND RIBBON.
2. WORK SHALL COMPLY WITH ALASKA DOT&PF STANDARD SPECIFICATIONS FOR HIGHWAY CONSTRUCTION, 2020 EDITION.
3. RECONDITION EXISTING ROAD SURFACE AND SHOULDERS IN ACCORDANCE WITH SECTION 303 RECONDITIONING. PAYMENT FOR THIS WORK SHALL BE 303.0002.0001 RECONDITIONING, STATION.
4. RECONDITION EXISTING DITCHES IN ACCORDANCE WITH SECTION 303 RECONDITIONING. PLACE DITCH SPOILS, NOT TO EXCEED 2' IN HEIGHT BACK OF DITCH. DITCH CLEARING AND GRUBBING IS INCIDENTAL TO THIS WORK. PAYMENT FOR THIS WORK SHALL BE 303.0002.0002 RECONDITIONING, STATION.
5. AGGREGATE SURFACE COURSE SHALL CONFORM WITH SECTION 301 - AGGREGATE BASE AND SURFACE COURSE. PAYMENT SHALL BE 301.0003.0001, TON.
6. AGGREGATE SHALL CONFORM TO SECTION 703-2.03 AGGREGATES. GRADATION SHALL BE TABLE 703-2, SURFACE COURSE, E-1.
7. EXISTING ROAD WIDTH VARIES. TOP OF SURFACEING SHALL BE 22' WIDE.
8. COMPACT E-1 SURFACE COURSE UNTIL IT DOES NOT YIELD MORE THAN 1/2" IN THE WHEEL PATH OF A LOADED 10-YARD DUMPTRUCK.
9. APPLY FIRST AND SECOND APPLICATION OF CALCIUM CHLORIDE IN ACCORDANCE WITH SECTION 624. PAYMENT SHALL BE 624.0001.0001, CALCIUM CHLORIDE, TON.



PORCUPINE TRAIL ROAD  
TYPICAL ROAD SECTION

SCALE: 1/4" = 1' - 0"



**Haines Borough**  
PO Box 1209  
Haines, Alaska 99827  
  
Tel: (907)766-6400



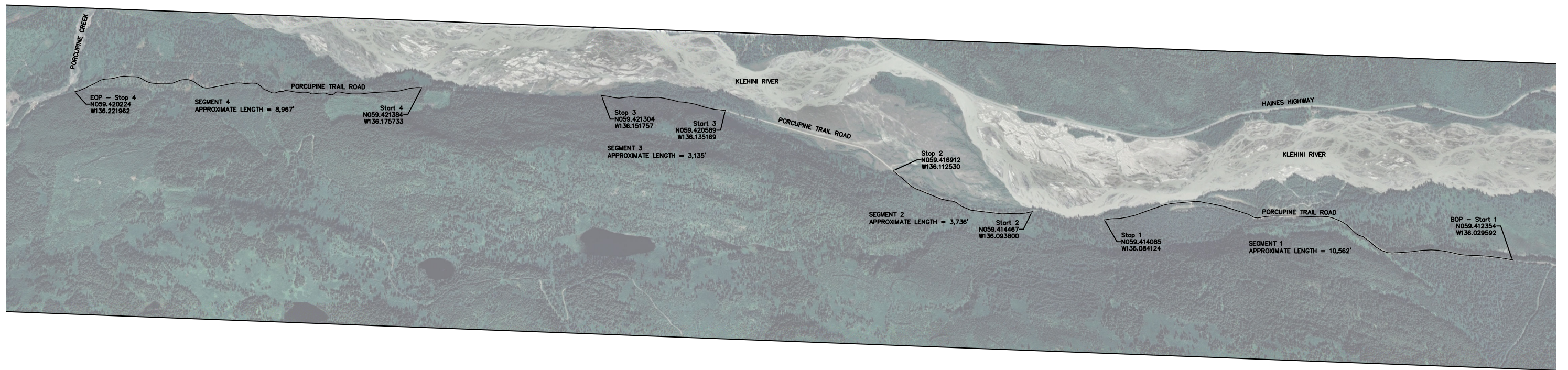
REVISION

REV	DATE	DESCRIPTION	DWN	CKD
A	MAY 22	ISSUED FOR BIDS	EGC	EGC

**HAINES BOROUGH  
PORCUPINE TRAIL ROAD, PHASE 1  
PROJECT 00013(435787),  
SITES 1 & 2**

**TYPICAL  
SECTION**

**C02**



**From:** [Parr, Jeffrey](#)  
**To:** [Edward Coffland](#); [Belanger, Jenny R \(MVA\)](#); [Carolann Wooton](#); [Garret Gladso](#); [Ethan Roemeling](#); [Fisher, Philip](#)  
**Cc:** [Alexander, Ivy](#); [Bookman, Azure](#); [Malone, Jack](#); [Zeppa, Jonathan D \(MVA\)](#)  
**Subject:** RE: DR-4585 Haines PW 0013 SOW Change Request  
**Date:** Thursday, July 21, 2022 10:48:56 AM  
**Attachments:** [image002.png](#)

---

Hi:

I forwarded the revision to the Archeologist for his thoughts.

---

**From:** Edward Coffland <ecoffland@haines.ak.us>  
**Sent:** Thursday, July 21, 2022 11:23 AM  
**To:** Parr, Jeffrey <jeffrey.parr@fema.dhs.gov>; Belanger, Jenny R (MVA) <jenny.belanger@alaska.gov>; Carolann Wooton <cwooton@haines.ak.us>; garret@prohns.com; Ethan Roemeling <ethan@prohns.com>  
**Cc:** Alexander, Ivy <ivy.alexander@fema.dhs.gov>; Bookman, Azure <azure.bookman@fema.dhs.gov>; Malone, Jack <Jack.Malone@fema.dhs.gov>; Zeppa, Jonathan D (MVA) <jonathan.zeppa@alaska.gov>  
**Subject:** RE: DR-4585 Haines PW 0013 SOW Change Request

**CAUTION:** This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please select the Phish Alert Report button on the top right of your screen to report this email if it is unsolicited or suspicious in nature.

Jeffrey: Please see attached drawing C02, Revision 1, as requested.

Thanks,

Edward Coffland, PE  
Director of Public Works  
Haines Borough  
(907)766-6414

---

**From:** Parr, Jeffrey <jeffrey.parr@fema.dhs.gov>  
**Sent:** Thursday, July 21, 2022 10:03 AM  
**To:** Edward Coffland <ecoffland@haines.ak.us>; Belanger, Jenny R (MVA) <jenny.belanger@alaska.gov>; Carolann Wooton <cwooton@haines.ak.us>; garret@prohns.com; Ethan Roemeling <ethan@prohns.com>  
**Cc:** Alexander, Ivy <ivy.alexander@fema.dhs.gov>; Bookman, Azure <azure.bookman@fema.dhs.gov>; Malone, Jack <Jack.Malone@fema.dhs.gov>; Zeppa, Jonathan D (MVA) <jonathan.zeppa@alaska.gov>  
**Subject:** RE: DR-4585 Haines PW 0013 SOW Change Request

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Thank you, adding a callout/edit to the design sheets to confirm/clarify what the existing terrain is, vs debris settlement & collection (different line style, arrow w/comment, etc) would likely make Phil's action a lot easier.

---

**From:** Edward Coffland <[ecoffland@haines.ak.us](mailto:ecoffland@haines.ak.us)>

**Sent:** Thursday, July 21, 2022 10:59 AM

**To:** Belanger, Jenny R (MVA) <[jenny.belanger@alaska.gov](mailto:jenny.belanger@alaska.gov)>; Carolann Wooton <[cwooton@haines.ak.us](mailto:cwooton@haines.ak.us)>; [garret@prohns.com](mailto:garret@prohns.com); Ethan Roemeling <[ethan@prohns.com](mailto:ethan@prohns.com)>

**Cc:** Alexander, Ivy <[ivy.alexander@fema.dhs.gov](mailto:ivy.alexander@fema.dhs.gov)>; Bookman, Azure <[azure.bookman@fema.dhs.gov](mailto:azure.bookman@fema.dhs.gov)>;

Parr, Jeffrey <[jeffrey.parr@fema.dhs.gov](mailto:jeffrey.parr@fema.dhs.gov)>; Malone, Jack <[Jack.Malone@fema.dhs.gov](mailto:Jack.Malone@fema.dhs.gov)>; Zeppa, Jonathan D (MVA) <[jonathan.zeppa@alaska.gov](mailto:jonathan.zeppa@alaska.gov)>

**Subject:** RE: DR-4585 Haines PW 0013 SOW Change Request

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Jenny: The ditches are filled with debris, so the intent of the typical was to show that some material would need to be removed from those ditches via excavation to re-establish the typical ditch width/slopes. The intent is not to expand ditches or widen the corridor. If necessary, we could add a callout to that effect.

Thanks,

Edward Coffland, PE  
Director of Public Works  
Haines Borough  
(907)766-6414

---

**From:** Belanger, Jenny R (MVA) <[jenny.belanger@alaska.gov](mailto:jenny.belanger@alaska.gov)>

**Sent:** Thursday, July 21, 2022 9:16 AM

**To:** Carolann Wooton <[cwooton@haines.ak.us](mailto:cwooton@haines.ak.us)>; Edward Coffland <[ecoffland@haines.ak.us](mailto:ecoffland@haines.ak.us)>; [garret@prohns.com](mailto:garret@prohns.com); Ethan Roemeling <[ethan@prohns.com](mailto:ethan@prohns.com)>

**Cc:** Alexander, Ivy <[ivy.alexander@fema.dhs.gov](mailto:ivy.alexander@fema.dhs.gov)>; Bookman, Azure <[azure.bookman@fema.dhs.gov](mailto:azure.bookman@fema.dhs.gov)>;

Parr, Jeffrey <[jeffrey.parr@fema.dhs.gov](mailto:jeffrey.parr@fema.dhs.gov)>; Malone, Jack <[Jack.Malone@fema.dhs.gov](mailto:Jack.Malone@fema.dhs.gov)>; Zeppa, Jonathan D (MVA) <[jonathan.zeppa@alaska.gov](mailto:jonathan.zeppa@alaska.gov)>

**Subject:** FW: DR-4585 Haines PW 0013 SOW Change Request

**Importance:** High

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Good Morning,

Please see request from FEMA below to clarify the scope for Phase I work.

Thank you,

**Jenny Belanger, Emergency Management Specialist II**  
**Department of Military and Veterans Affairs**  
**Division of Homeland Security & Emergency Management**  
**Disaster Assistance**  
**907-428-7036 or 232-7403**

**907-428-7009 (Fax)**

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**From:** Alexander, Ivy <[ivy.alexander@fema.dhs.gov](mailto:ivy.alexander@fema.dhs.gov)>  
**Sent:** Thursday, July 21, 2022 9:11 AM  
**To:** Belanger, Jenny R (MVA) <[jenny.belanger@alaska.gov](mailto:jenny.belanger@alaska.gov)>  
**Cc:** Bookman, Azure <[azure.bookman@fema.dhs.gov](mailto:azure.bookman@fema.dhs.gov)>; Parr, Jeffrey <[jeffrey.parr@fema.dhs.gov](mailto:jeffrey.parr@fema.dhs.gov)>; Fisher, Philip <[philip.fisher@fema.dhs.gov](mailto:philip.fisher@fema.dhs.gov)>; Malone, Jack <[Jack.Malone@fema.dhs.gov](mailto:Jack.Malone@fema.dhs.gov)>; Zeppa, Jonathan D (MVA) <[jonathan.zeppa@alaska.gov](mailto:jonathan.zeppa@alaska.gov)>  
**Subject:** RE: DR-4585 Haines PW 0013 SOW Change Request  
**Importance:** High

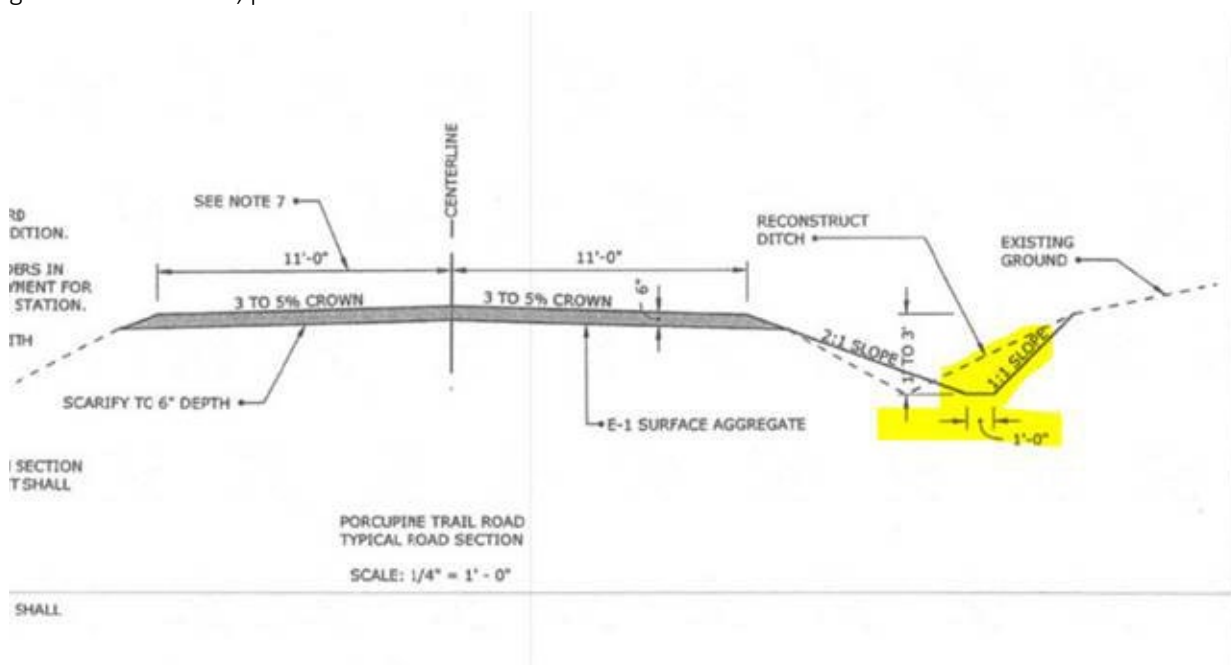
Good Morning Jenny,

I am reaching out to clarify the following:

Our understanding is HB's SOW Change Request for V1/P1 on Porcupine Road's is "Phase I is only to reestablish ditches and repair the surface of the roadway in the existing footprint".

Per the applicant's proposal, Phase 1 Repairs is for Roadway and ditch reconditioning (Sites 1&2).

However, it looks like the engineering design contains additional expansion of the ditches and new ground disturbance; please see below:



We understand this is a priority project, can we reach out to the applicant to confirm the abovementioned details?

Currently, the illustrated proposed expansion and added depth to the ditches are not in alignment with our understanding that Phase 1 is going to be completed within the existing prism/ footprint. If HB intends to complete the reconstruction outside the pre-DR condition, we will need to discuss how to align that with programmatic requirements, and it may need SHPO review ( lcc'd Phil and Jeff for awareness and guidance) in addition to the Large Project Notification which may add a 60 day wait before a project reaches the obligation phase.

Please advise, we are standing by.

Best,

Ivy Alexander

Emergency Management Specialist

Public Assistance Disaster Operations | Recovery Division | FEMA Region X

Mobile: 202-924-7001

[ivy.alexander@fema.dhs.gov](mailto:ivy.alexander@fema.dhs.gov)

Federal Emergency Management Agency

[fema.gov](https://www.fema.gov)



---

**From:** Fisher, Philip <[philip.fisher@fema.dhs.gov](mailto:philip.fisher@fema.dhs.gov)>

**Sent:** Thursday, July 14, 2022 3:53 PM

**To:** Belanger, Jenny R (MVA) <[jenny.belanger@alaska.gov](mailto:jenny.belanger@alaska.gov)>; Merino, Zachary <[zachary.merino@fema.dhs.gov](mailto:zachary.merino@fema.dhs.gov)>

**Cc:** Bookman, Azure <[azure.bookman@fema.dhs.gov](mailto:azure.bookman@fema.dhs.gov)>; Alexander, Ivy <[ivy.alexander@fema.dhs.gov](mailto:ivy.alexander@fema.dhs.gov)>;

Parr, Jeffrey <[jeffrey.parr@fema.dhs.gov](mailto:jeffrey.parr@fema.dhs.gov)>; Cook, Sirvirther <[sirvirther.cook@fema.dhs.gov](mailto:sirvirther.cook@fema.dhs.gov)>; Carolann

Wooton <[cwooton@haines.ak.us](mailto:cwooton@haines.ak.us)>; Miller, Linda Y (MVA) <[linda.miller2@alaska.gov](mailto:linda.miller2@alaska.gov)>; Zeppa, Jonathan D (MVA) <[jonathan.zeppa@alaska.gov](mailto:jonathan.zeppa@alaska.gov)>

**Subject:** RE: DR-4585 Haines PW 0013 SOW Change Request

Hi Jenny,

That was my bad, I misunderstood. I thought the project was about to be in our EHP queue for review, not that we were reviewing the amendment for CRC development. I have no concerns as is so it is good to go. Sorry!

Best,  
Phil

---

**From:** Belanger, Jenny R (MVA) <[jenny.belanger@alaska.gov](mailto:jenny.belanger@alaska.gov)>  
**Sent:** Thursday, July 14, 2022 4:49 PM  
**To:** Fisher, Philip <[philip.fisher@fema.dhs.gov](mailto:philip.fisher@fema.dhs.gov)>; Merino, Zachary <[zachary.merino@fema.dhs.gov](mailto:zachary.merino@fema.dhs.gov)>  
**Cc:** Bookman, Azure <[azure.bookman@fema.dhs.gov](mailto:azure.bookman@fema.dhs.gov)>; Alexander, Ivy <[ivy.alexander@fema.dhs.gov](mailto:ivy.alexander@fema.dhs.gov)>; Parr, Jeffrey <[jeffrey.parr@fema.dhs.gov](mailto:jeffrey.parr@fema.dhs.gov)>; Cook, Sirvirther <[sirvirther.cook@fema.dhs.gov](mailto:sirvirther.cook@fema.dhs.gov)>; Carolann Wooton <[cwooton@haines.ak.us](mailto:cwooton@haines.ak.us)>; Miller, Linda Y (MVA) <[linda.miller2@alaska.gov](mailto:linda.miller2@alaska.gov)>; Zeppa, Jonathan D (MVA) <[jonathan.zeppa@alaska.gov](mailto:jonathan.zeppa@alaska.gov)>  
**Subject:** RE: DR-4585 Haines PW 0013 SOW Change Request

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Hi Phil,

Curious – since Phase I is only to reestablish ditches and repair the surface of the roadway in the existing footprint, could Phase I SOW change be approved and the SHPO allowance/consultation be resolved for Phase 2 & 3 (steep embankment and river washout areas) SOW Change that will come when design and engineering is completed?

Thank you,

**Jenny Belanger, Emergency Management Specialist II**  
**Department of Military and Veterans Affairs**  
**Division of Homeland Security & Emergency Management**  
**Disaster Assistance**  
**907-428-7036 or 1-800-478-2337**  
**907-428-7009 (Fax)**

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**From:** Fisher, Philip <[philip.fisher@fema.dhs.gov](mailto:philip.fisher@fema.dhs.gov)>  
**Sent:** Thursday, July 14, 2022 2:51 PM  
**To:** Merino, Zachary <[zachary.merino@fema.dhs.gov](mailto:zachary.merino@fema.dhs.gov)>  
**Cc:** Belanger, Jenny R (MVA) <[jenny.belanger@alaska.gov](mailto:jenny.belanger@alaska.gov)>; Bookman, Azure <[azure.bookman@fema.dhs.gov](mailto:azure.bookman@fema.dhs.gov)>; Alexander, Ivy <[ivy.alexander@fema.dhs.gov](mailto:ivy.alexander@fema.dhs.gov)>; Parr, Jeffrey <[jeffrey.parr@fema.dhs.gov](mailto:jeffrey.parr@fema.dhs.gov)>; Cook, Sirvirther <[sirvirther.cook@fema.dhs.gov](mailto:sirvirther.cook@fema.dhs.gov)>; Carolann Wooton

<[cwooton@haines.ak.us](mailto:cwooton@haines.ak.us)>

**Subject:** RE: DR-4585 Haines PW 0013 SOW Change Request

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Hi Zachary,

I don't think there is anything else needed from the applicant. I reached out to the State Historic Preservation Office with a question about the project but not the Borough. There is an archaeological site on the State's website along Porcupine Road but I believe it is mapped in the wrong location based on the description. I am trying to get this sorted out with the SHPO as it could either be a quick allowance or require a formal consultation with a 30+ day review period. I will let you know when I find out the answer/approach required. Have a great day.

Best,  
Phil

---

**From:** Merino, Zachary <[zachary.merino@fema.dhs.gov](mailto:zachary.merino@fema.dhs.gov)>

**Sent:** Thursday, July 14, 2022 3:19 PM

**To:** Fisher, Philip <[philip.fisher@fema.dhs.gov](mailto:philip.fisher@fema.dhs.gov)>

**Cc:** Belanger, Jenny R (MVA) <[jenny.belanger@alaska.gov](mailto:jenny.belanger@alaska.gov)>; Bookman, Azure <[azure.bookman@fema.dhs.gov](mailto:azure.bookman@fema.dhs.gov)>; Alexander, Ivy <[ivy.alexander@fema.dhs.gov](mailto:ivy.alexander@fema.dhs.gov)>; Parr, Jeffrey <[jeffrey.parr@fema.dhs.gov](mailto:jeffrey.parr@fema.dhs.gov)>; Cook, Sirvirther <[sirvirther.cook@fema.dhs.gov](mailto:sirvirther.cook@fema.dhs.gov)>; Carolann Wooton <[cwooton@haines.ak.us](mailto:cwooton@haines.ak.us)>

**Subject:** FW: DR-4585 Haines PW 0013 SOW Change Request

**Importance:** High

Hello Mr. Fisher,

I spoke with Mr. Parr earlier this week about a version request for this project. He informed me that the environmental side of things checks out. He did mention that you had contacted the applicant but required additional information for the historic preservation piece. I just wanted to get this on everyone's radar. Is there something Haines Borough still needs to provide before we can move forward with the version request?

Keep me posted,  
Zachary Merino

---

**From:** Belanger, Jenny R (MVA) <[jenny.belanger@alaska.gov](mailto:jenny.belanger@alaska.gov)>

**Sent:** Thursday, July 14, 2022 1:52 PM

**To:** Alexander, Ivy <[ivy.alexander@fema.dhs.gov](mailto:ivy.alexander@fema.dhs.gov)>

**Cc:** Merino, Zachary <[zachary.merino@fema.dhs.gov](mailto:zachary.merino@fema.dhs.gov)>; Carolann Wooton <[cwooton@haines.ak.us](mailto:cwooton@haines.ak.us)>; Miller, Linda Y (MVA) <[linda.miller2@alaska.gov](mailto:linda.miller2@alaska.gov)>; Zeppa, Jonathan D (MVA) <[jonathan.zeppa@alaska.gov](mailto:jonathan.zeppa@alaska.gov)>; Bookman, Azure <[azure.bookman@fema.dhs.gov](mailto:azure.bookman@fema.dhs.gov)>

**Subject:** DR-4585 Haines PW 0013 SOW Change Request



**Importance:** High

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Good Afternoon Ivy,

Attached is the formal Scope of Work Change request for Haines Borough, PW 0013, Porcupine Trail Road. We are asking for a quick turnaround on the review and approval as Haines Borough is standing by to award contract to complete work this summer.

Please let us know if you have any questions or need additional information.

Thank you,

**Jenny Belanger, Emergency Management Specialist II**  
**Department of Military and Veterans Affairs**  
**Division of Homeland Security & Emergency Management**  
**Disaster Assistance**  
**907-428-7036 or 1-800-478-2337**  
**907-428-7009 (Fax)**

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**FEMA**

The EHP recommendations and concerns in this report are based on a Site Inspection, without full details of the scope of work for the site and are therefore subject to change. Final EHP review of the project will be performed once the project is submitted and the project reaches the EHP queue.

**FEMA EHP Rep(s):** Laura Herriott (Environmental Protection Specialist – EHP Manager)

**Other Personnel:** Garret Gladsjo (Applicant Contractor)  
Annet Kreitze (Borough Manager)  
Jenny Belanger (STATE)  
Karen Rose (FEMA)  
Angela Borjon (FEMA)

**Date of Site Inspection:** 8/31/2023

**Applicant:** Haines, AK

---

**Site Information:** Cat C – Porcupine Road  
Total: (59.412360, -136.028085) to (59.420164, -136.221220)

**Purpose:**

The August 31<sup>st</sup>, 2023, site inspection was completed to verify the temporary and permanent work completed along Porcupine Road. The team stopped 17 at locations to take measurements, 3 of which were locations confirmed to be work completed and paid for by a third party: Constantine, the local mine.

**General Information:**

Haines, Alaska is located on the northern part of the Alaska Panhandle. As of the 2020 Census, the population of Haines Census-designated place, was 1,657, which was down from 1,713 people in 2010.

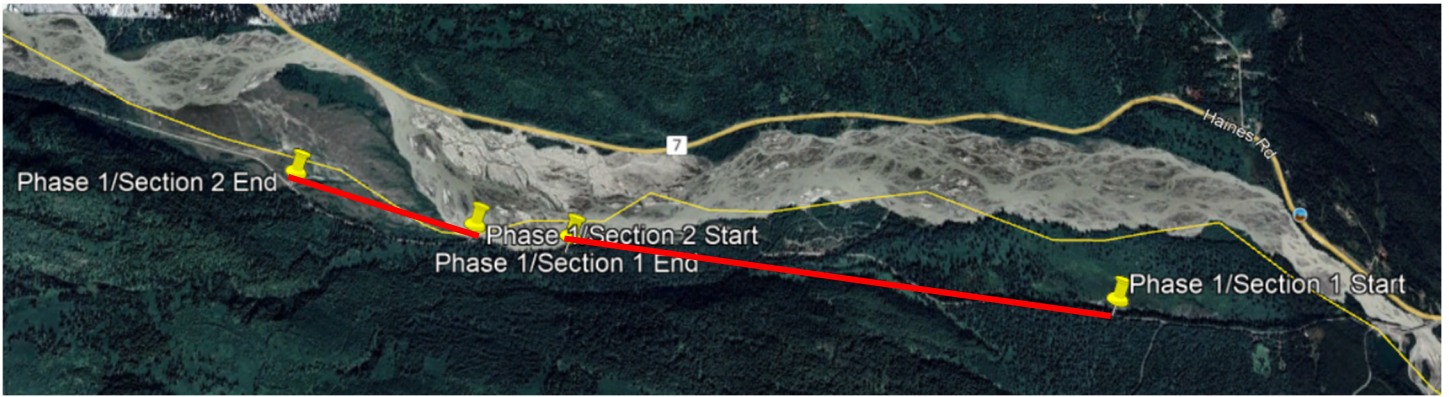
The Historical Dalton Trail: Porcupine Road formerly known as the Dalton Trail served as the primary trail during the Klondike Gold Rush of 1898. Gold was discovered at Porcupine Creek Mine, which is located at the end of Porcupine Road. During the 1896-1899 Haines became the supply center for the Dalton Trail via the Chilkat River.

**Phase 1 SOW as reviewed 8/19/2023:**

Phase 1 Repairs include repairs at 4 locations ranging from 0.6mi to 2mi sections along Porcupine Road. Repairs include repairing the road back to pre-disaster condition with the addition of Calcium Chloride, and repairs to ditch along both sides of the road.

**Phase 1 Section 1 & Section 2:** (59.412354, -136.029592) to (59.416912, -136.112530): Approximately 3-mile length between GPS points. The applicant made repairs to two sections between the 3 miles:

- Section 1 (59.412354, -136.029592) to (59.414085, -136.084124) – The applicant intends to repair 1.92 miles and associated ditch repair along both sides of the road.
- Section 2 (59.414467, -136.093800) to (59.416912, -136.112530) – The applicant intends to repair 0.6 miles of road surface and ditch repairs.



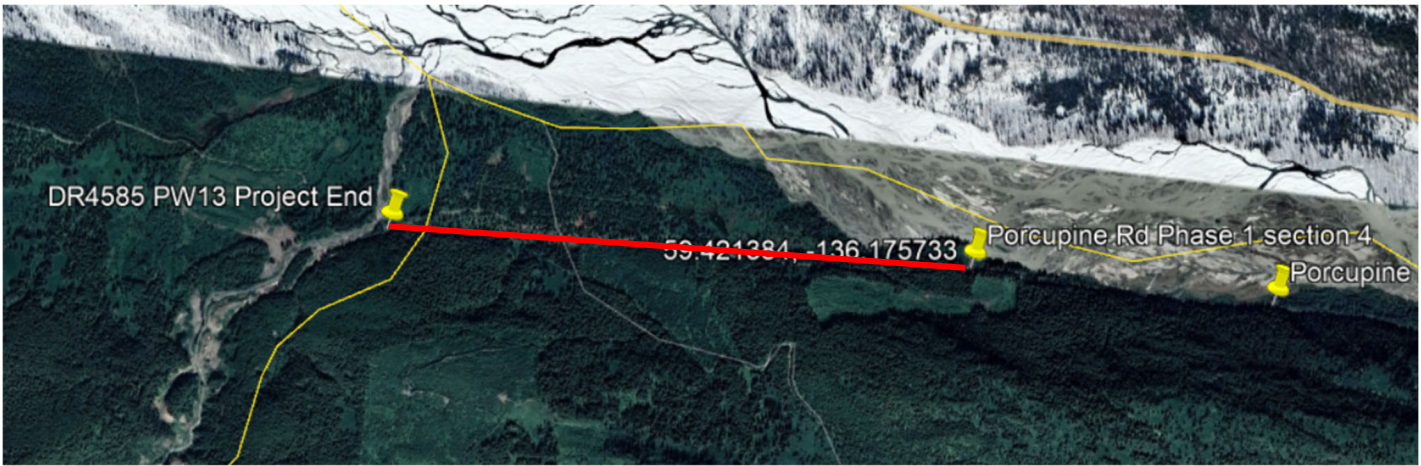
Google Earth – Showing the location of Phase 1, Section 1 & 2: Proximal the Chilkat River. The Red line on the right indicates the 1.92 mile section of completed work for Phase 1, Section 1. The red line on the left indicates the 0.6 miles of road work completed in Phase 1 Section 2.

**Phase 1 Section 3:** (59.420589, -136.135169) to (59.421304, -136.15157): The applicant intends to repair 0.6 miles of road surface and ditch repairs.

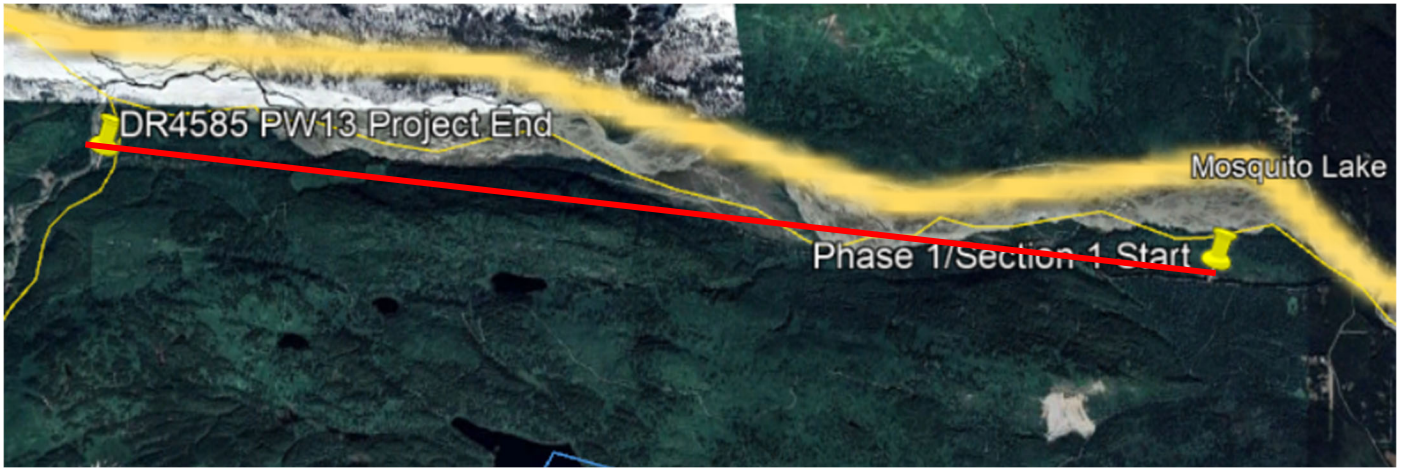


Google Earth – Showing the location of Phase 1, Section 3: Proximal the Chilkat River. The red line indicates the 0.6 miles of road work completed for Phase 1 Section 3.

**Phase 1 Section 4** (59.421384, -136.175733) to (59.420224, -136.221962): The applicant intends to repair 1.63 miles of road surface and ditch repairs.



Google Earth Image – Location of Phase 1 Section 4: Red Line indicates the 1.63 miles of completed road work for Phase, Section 4.



Google Earth Image – Total 7 miles from starting GPS point to Stopping GPS Point.

**Site Visit Measurements:**

To verify the work completed in Phase 1, the applicant and contractor took the FEMA team along Porcupine Road. The following measurements were taken: Total width which included shoulder lengths, length of the road, and the lengths of both shoulders. Please see table below.

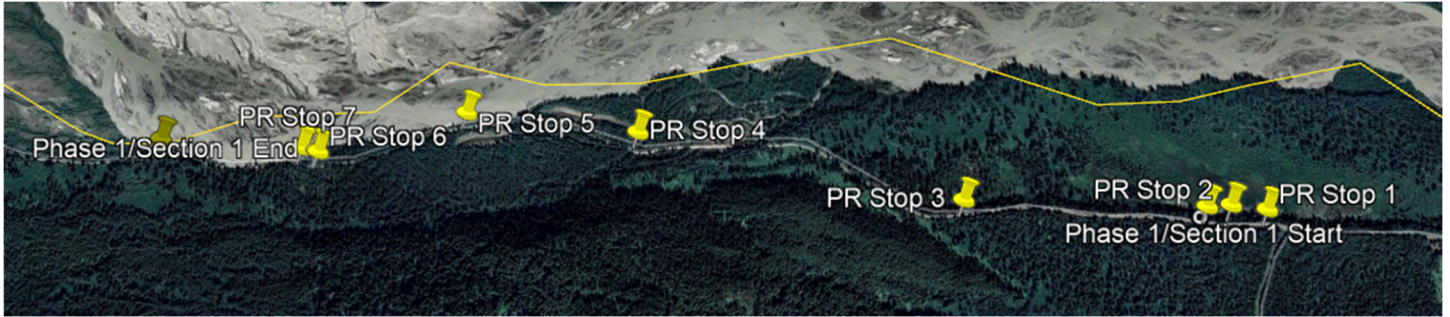
\*\* indicate locations where Constantine/The Mine completed work.

**Sites:**

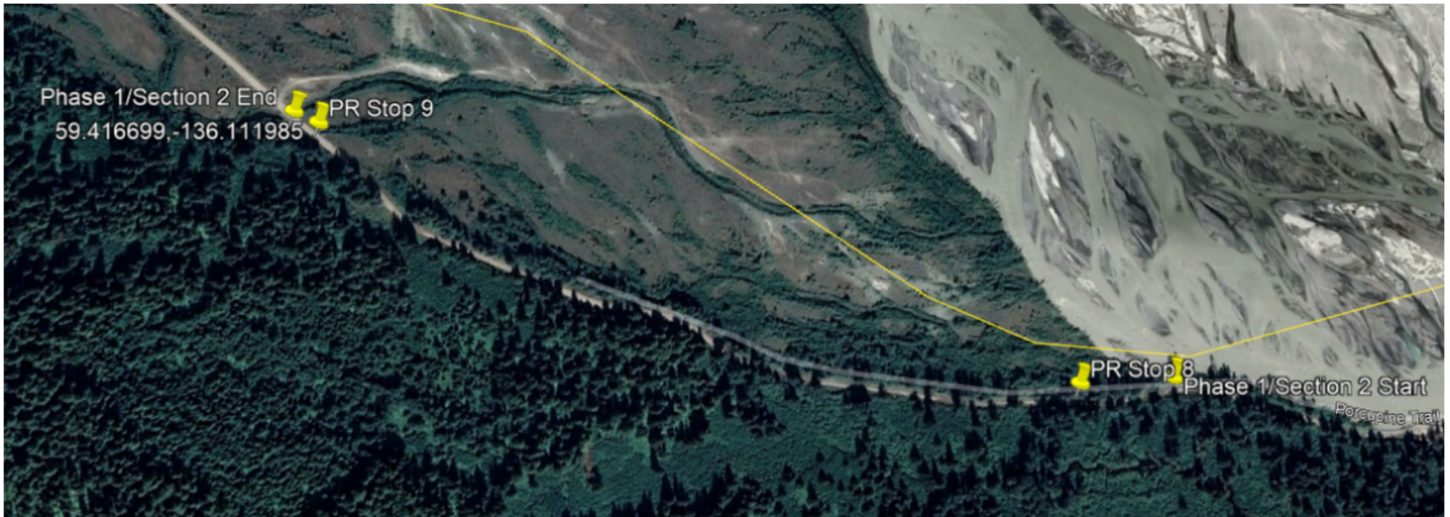
Stops	GPS (Lat, Long)	Phase/Section	Width Total (shoulders & RD)	Road Length	Shoulder Length
Stop 1	59.412211, -136.025926	0.14 miles before Phase 1/Section 1 start GPS	25ft	17ft	4ft on both sides
Stop 2	59.412360, -136.028085	0.5 miles before Phase 1/Section 1 start GPS	25.7ft	17ft	4.35ft on both sides
Stop 3	59.412512, -136.044383	Phase 1/Section 1	27.8ft - 28ft	18ft	4ft (L) & 6ft (R)
Stop 4	59.414699, -136.064343	Phase 1/Section 1	24.5ft	16.9ft	3.8ft on both sides  *Culvert – Herman Creek
Stop 5**	59.415373, -136.075005	Phase 1/Section 1	27.10ft	12.5ft	4.1ft (L) & 10.5ft (R)
Stop 6	59.414066, -136.084047	Approximately 25ft West of the Phase 1, Section 1 end point.	26ft	16ft	7ft (L) & 3ft (R)

Stop 7**	59.414205, -136.085080	Approximately 191ft West of the Phase 1, Section 1 end point.	35.7ft	14ft	8.7ft (L) & 13ft (R)
Stop 8	59.414357, -136.095753	Phase 1/ Section 2	27.8ft	17ft	5ft (L) & 5.3ft (R)
Stop 9	59.416699, -136.111985	Phase 1/Section 2	27.9ft	15.8ft	7ft (L) & 5.1ft (R)
Stop 10	59.420656, -136.135637	Phase 1/Section 3	25ft	16ft	3.4ft (L) & 6ft (R)
Stop 11	59.421021, -136.138316	Phase 1/Section 3	28ft	16ft	7ft (L) & 5.4ft (R)
Stop 12	59.421397, -136.151576	Phase 1/Section 3	28ft	17.4ft	8ft (L) & 3.4ft (R)
Stop 13**	59.421366, -136.173309	Located in-between Phase 1, Section 3 End -AND- Phase 1, Section 4 Start	21.5ft	13.6ft	5ft (L) & 2.6ft (R)
Stop 14	59.421278, -136.177367	Phase 1/Section 4	20ft	12ft	6ft (L) & 2ft (R)
Stop 15	59.420716, -136.188588	Phase 1/Section 4	21.7ft	13.3ft	6ft (L) & 1.4ft (R)
Stop 16	59.421098, -136.201261	Phase 1/Section 4	32ft	17ft	2ft (L) & 9ft (R)
Stop 17	59.420164, -136.221220	Phase 1/Section 4	23.1ft	16.7ft	2ft (L) & 4.4 (R)

**Google Earth Images of Site Inspection Stops Including Section endpoints:**



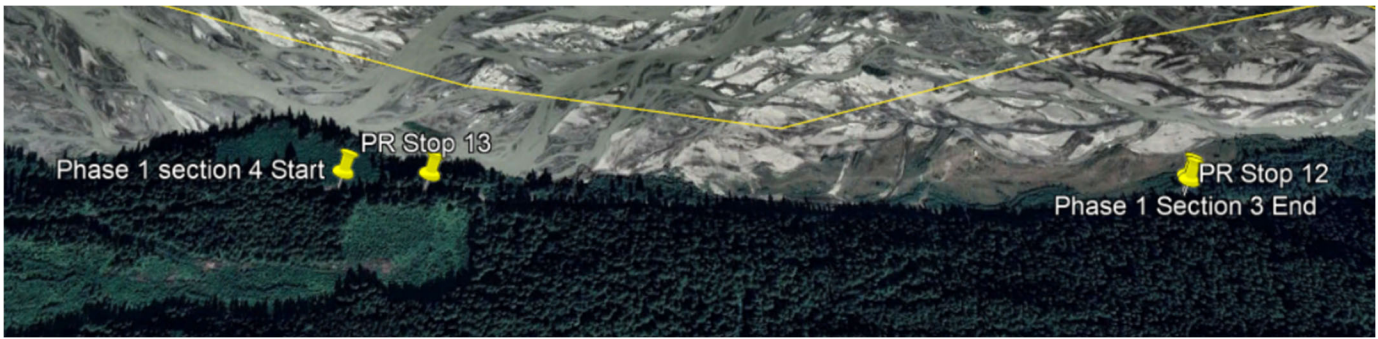
Google Earth Image – the first 7 stops. According to the applicant and applicant's contractor, stops numbers, 5 and 7 were locations where work was completed and paid for by Constantine/The Mine.



Google Earth Image – Stops 8 & 9 within Phase 1 Section 2 Work. Phase 1 Section 2 (59.414467, -136.093800) to (59.416912, -136.112530).



Google Earth Image – Stops 10, 11, and 12 fall within Phase 1 Section 3 (59.420589, -136.135169) to (59.421304, -136.15157).



Google Earth Image: Stop #13 is in-between Section #3 and Section #4.



Google Earth Image – Stops #14, 15, 16, and 17 fall within Section 4.

**Third Part Work:** Stops 5, 7, & 13 – the locations where Constantine completed permanent work.

Stop #5 (59.415373, -136.075005):

- NEPA – Connected Action. To properly complete the NEPA review, the SOW for this section is required.
- EO11980 Wetland– Per the National Wetland Inventory mapper, the site is within in listed Wetland.

Stop #7 (59.414205, -136.085080)

- NEPA – Connected Action. To properly complete the NEPA review, the SOW for this section is required.
- EO11980 Wetland– Per the National Wetland Inventory mapper, the site is within in listed Wetland.

Stop #13 (59.421366, -136.173309)

- NEPA – Connected Action. To properly complete the NEPA review, the SOW for this section is required.

**EHP Concerns:**

- Stop #4 (59.414699, -136.064343): Culvert
  - NEPA – Connected Action. To properly complete the NEPA review, the SOW for this section is required.
  - CWA– USACE Permit (Or written documentation from USACE indicating the project falls within a NWP, or written documentation from USACE indicating permits are not necessary)
  - EFH – According to Alaska Department of Fish and Game, the following Species are present in Herman Creek: Dolly Varden, Sockeye Salmon, Coho Salmon, Pink Salmon, Chum Salmon, Chinook Salmon, Eulachon, and Cutthroat Trout.
- NEPA – To complete a legally sufficient EHP review, the SOW details for the third-party work is required.
  - Phase 2 & Phase 3 work is yet to be determined. The SOW for both phases are necessary to complete the EHP Compliance Review.
- NHPA – Road width. All previous reports indicate the road is 22ft in width. Measurements taken 8/31/2023 indicate lengths ranging from 20ft – 35 ft.
- Work in or Near Water
- Essential Fish Habitat
- Bypass Road - there was discussion of a bypass road built or plan to be built in the section between Section 1 and Section 2. It was unclear if work has been completed or is to be completed. Clarification on the bypass SOW is needed.

\*\*FEMA Sent the applicant and stare an RFI 9/20/2023. One clarification was the culvert work. The work completed near stop #4, near the culvert, was work completed by a third-party (not Constantine). Additional clarification will be helpful regarding who did what work around the culvert.



## Q & A History

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### Deadline

06/30/2022 09:00 PM EDT

### Remarks

All questions regarding this project must be posted on the Bid Express Platform. No in person, phone, or email questions will be answered.

| *Published*

Q.

**Mobilization-Fixed costs on this project are substantial - Crusher mobilization/set-up - trucks-grader-compact and support gear. The again with demobilization. - Project overhead and incidentals also make up this item. Allocating these fixed costs into unit bid items is challenging and suggest a mob item be included.**  
**TY**

Asked By: Glacier Construction, Inc. dba Southeast Road Builders on 06/25/2022 06:26 PM EDT

Published By: Ed Coffland on 06/27/2022 12:02 PM EDT

A.

**We will send an addendum to add a new pay item 640.0001.01 Mobilization and Demobilization. The pay item unit will be LS.**

Answered By: Ed Coffland on 06/27/2022 12:02 PM EDT

Published By: Ed Coffland on 06/27/2022 12:02 PM EDT

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| *Published*

Q.

**Addendum 1, Item 5 states "To ensure compliance with AS 23.20.265, the Contractor shall complete a 'Tax Clearance Request Form for Contractors' and submit to (ADL&WD). Completed Tax form shall be uploaded to the Bid Express Platform with your bid."**

**Is the contractor to provide a copy of the approved form from ADL&WD as part of it's bid, or is the owner requiring a returned form from ADL&WD showing tax clearance is granted? Providing a completed form from ADL&WD may take time that would conflict with the bid due date. How should the contractor complete the "Specific time period a tax clearance is being requested for" on the form?**

Asked By: Glacier Construction, Inc. dba Southeast Road Builders on 06/29/2022 04:16 PM EDT

Published By: Carolann Wooton on 06/29/2022 05:21 PM EDT

A.

**No, we are just requiring the completed form, not the approved form, with your bid. We will submit it to DOL and get the clearance back before the final payment for the project is awarded.**

Answered By: Carolann Wooton on 06/29/2022 05:21 PM EDT

Published By: Carolann Wooton on 06/29/2022 05:21 PM EDT

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| *Published*

Q.

noted excavation and embankment is deleted and all required is subsidiary. Per note #7, existing road width varies, however top surfacing shall be 22 ft. in width.

It appears, without complete survey prior to bid, some areas may be less than the 22 ft. requirement. Additionally, some areas may take some unknown quantity to comply. Is it the intent of the contract for all excavation/embankment to be subsidiary to comply with the 22 ft requirement? If so please provide us with an estimate of excavation/embankment quantities to comply - TY

Asked By: Glacier Construction, Inc. dba Southeast Road Builders on 06/29/2022 04:45 PM EDT

Published By: Ed Coffland on 06/29/2022 06:33 PM EDT

A.

Our intent is for the reconditioned road surface to match the existing road surface up to 22 feet wide. Where the existing road surface is less than 22 feet wide, we do not intend to widen the, but recondition to match the narrower road.

Answered By: Ed Coffland on 06/29/2022 06:33 PM EDT

Published By: Ed Coffland on 06/29/2022 06:33 PM EDT

19:00:53

## RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project PA-10-AK-4585-PW-00043

Title: 181119 - Haines Emergency Protective Measures

## NEPA DETERMINATION

<b>Non Compliant Flag:</b> No	<b>EA Draft Date:</b>	<b>EA Final Date:</b>
<b>EA Public Notice Date:</b>	<b>EA Fonsi</b>	<b>Level:</b> CATEX
<b>EIS Notice of Intent</b>	<b>EIS ROD Date:</b>	

**Comment** Haines Borough, Cat B, Work Completed, CRC Gross Cost \$401,272.70: The applicant utilized force account labor and contract labor to provided waste disposal for Beach Road residents, removed gravel and debris from multiple manholes, established an Emergency Operations Center at 213 Haines Highway, Haines, AK (GPS: 59.231741,-135.447796), search and rescue throughout Haines, Alaska, emergency repairs for harbor skiff search and rescue motor-boat, emergency repairs to the harbor moorage floats (According to RFI-PRJ-66431, no work was completed in water), hotel stays for EMT staff, temporary repairs to the wastewater treatment plant system, safety information dissemination, landslide warning signs and caution lights, monitoring and avalanche inspection, and temporary road and culvert repair.

Road and culvert include the following permanent work:

- \*. Young Road (GPS Start: 59.24971, -135.43603, Stop: 59.24028, -135.44375, approximately 0.8 mile) - Applicant utilized force account labor and contract labor, to repair washed out road. Young Road was graded, filled with 708 CY of 3" Minus and 24 CY of Class 1 Rip Rap. The applicant installed temporary culverts at Young Road and Mathias Dr and Barnett Drive. The applicant also placed pipe bedding on exposed water line between Oslund Drive and Mathias Ave, backfilled eroded trench, and waterline near Barnett Road, using 126 TN of 3" crushed gravel. The applicant also repaired a CMP storm drain along the sidewalk, reconstructed a ditch, and repaired several drainage pipes. Debris removal was also associated with this location.
- \*. Chilkat Trail Road (GPS Start: 59.211892, -135.448155, Stop: 59.210737, -135.44808, approximately 479ft)- Washed out road was graded, filled with 336 CY of 1" Minus.
- \*. First Avenue North (GPS: 59.238073, -135.442671) - Washed out road was graded, filled with 36 CY of 3" Minus.
- \*. Soap Suds Alley (GPS Start: 59.22691, -135.44054, Stop: 59.22790, -135.43863) - Washed out road was graded, filled with 48 CY of 3" Minus.
- \*. Mink Way (GPS: 59.26689, -135.44852) - Washed out road was graded, filled with 72 CY of 3" Minus.
- \*. Haven Court (GPS Start: 59.244628, -135.432761, Stop: 59.245258, -135.428822) - Washed out road was graded, filled with 72 yards of 3" minus.
- \*. Porcupine Trail Road (GPS: Start: 59.41235, -136.02959, End: 59.42065, -136.19023), Road prep, clearing and grubbing, finishing, and shaping.
- \*. Cathedral View Drive (GPS Start: 59.24455, -135.49058, Stop: 59.24308, -135.48724, approximately 0.3 mile) - SERB hauled slide material to fill Cathedral View Drive and backfill eroded trench. Installed 2 24" CPP culverts. Installed 1-12" driveway culvert. Re-installed 24" CPP culvert at the bottom of Cathedral View Dr. Graded and compacted roadway.
- \*. Lily Lake (Jeep Trail) (GPS: 59.20746, -135.41828) Emergency staging/road repairs. Haul and place material to reconstruct road, using excavator and dump truck, 20 FT of 24" CPP.
- \*. Beach Road (GPS Start: 59.22426, -135.41641, End: 59.21964, -135.39862, approximately 0.7 mile), Stabilization of the site, search and rescue, waste disposal, and monitoring and inspection of avalanche adjacent to the road.
- \*. Piedad Road (GPS Start 59.24529, -135.47637, Stop: 59.24462, -135.47622, approximately 141 ft). The applicant installed a 12" culvert near the water treatment plant at the top of Piedad Road; Installed 2 runs of 18" CPP by 50' long at the top of Piedad Road near the water treatment plant. Dug drainage ditch uphill of the new culverts. The dimensions of the ditch are 2000 FT L x 1 FT D x 3 FT W. (GPS START: 59.239519, -135.476181 to 59.244985, -135.476261). Debris was disposed of at (59.217997, -135.424935). The TDSR was located at (59.217848, -135.425685). Road repair materials were provided by: Northern Construction Stockpile (59.238425, -135.468892) and Southeast Road Builders Borrow Pit (59.257017, -135.544942). All work and costs in this project fall between 12/2/2020 and 8/28/2021.
- lherriot - 05/18/2022 21:07:33 GMT
- \*\*\*Rework due to costs being removed from the equipment summary. Revised Estimated cost is \$400,761. - jparr2 - 06/21/2022 18:17:48 GMT
- /Project reworked 6/ for a cost adjustment. EHP review still applies. - lherriot - 06/21/2023 18:59:34 GMT

## CATEX CATEGORIES

## RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project PA-10-AK-4585-PW-00043

Title: 181119 - Haines Emergency Protective Measures

Catex Category Code	Description	Selected
*n7	(*n7) Federal Assistance for Structure and Facility Upgrades. Federal assistance for the reconstruction, elevation, retrofitting, upgrading to current codes and standards, and improvements of pre-existing facilities in existing developed areas with substantially completed infrastructure, when the immediate project area has already been disturbed, and when those actions do not alter basic functions, do not exceed capacity of other system components, or modify intended land use. This category does not include actions within or affecting streams or stream banks or actions seaward of the limit of moderate wave action (or V zone when the limit of moderate wave action has not been identified).	Yes

## EXTRAORDINARY

Extraordinary Circumstance Code	Description	Selected ?
	No Extraordinary Circumstances were selected	

## ENVIRONMENTAL LAW / EXECUTIVE ORDER

Environmental Law/ Executive Order	Status	Description	Comment
Clean Air Act (CAA)	Completed	Project will not result in permanent air emissions - Review concluded	
Coastal Barrier Resources Act (CBRA)	Completed	Project is not on or connected to CBRA Unit or otherwise protected area - Review concluded	
Clean Water Act (CWA)	Completed	Project would not affect any water of the U.S. - Review concluded	
Coastal Zone Management Act (CZMA)	Completed	Project is not located in a coastal zone area and does not affect a coastal zone area - Review concluded	
Executive Order 11988 - Floodplains	Completed	Located in floodplain or effects on floodplain/flood levels	Based on the effective FIRM panel 020008B, dated 5/1/1987, the project area is not mapped. Due to the several project locations proximity to the Chilkat Inlet, an 8-step decision making process was completed. Please see attached 8-step decision making process. - lherriot - 05/18/2022 21:19:42 GMT
	Completed	Possible adverse effects associated with investment in floodplain, occupancy or modification of floodplain environment	

## RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project PA-10-AK-4585-PW-00043

Title: 181119 - Haines Emergency Protective Measures

Environmental Law/ Executive Order	Status	Description	Comment
	Completed	8 Step Process Complete - documentation attached - Review concluded	
Executive Order 11990 - Wetlands	Completed	Located in wetlands or effects on wetlands	Per attached USFWS Wetlands Inventory (NWI) mapper, accessed dated 5/18/2022., several of the proposed scope of work is locations are proximal a wetland. The project, as described, is for in-kind repairs/restoration actions for restoring to pre-disaster conditions and ground disturbance totals are less than 0.1 acres from construction activities. - lherriot - 05/18/2022 21:39:16 GMT
	Completed	Possible adverse effect associated with constructing in or near wetland	
	Completed	Review completed as part of floodplain review - Review concluded	
Executive Order 12898 - Environmental Justice for Low Income and Minority Populations	Completed	Low income or minority population in or near project area	
	Completed	No disproportionately high and adverse impact on low income or minority population - Review concluded	
Endangered Species Act (ESA)	Completed	No listed species and/or designated critical habitat present in areas affected directly or indirectly by the federal action - Review concluded	The proposed project will not destroy or adversely modify suitable habitat and will not affect any other listed species under the jurisdiction of the USFWS. It is therefore determined the proposed project would have "No Effect" on listed species and consultation with the USFWS under Section 7 of the Endangered Species Act is not required. - lherriot - 05/18/2022 21:09:03 GMT
Farmland Protection Policy Act (FPPA)	Completed	Project does not affect designated prime or unique farmland - Review concluded	
Fish and Wildlife Coordination Act (FWCA)	Completed	Project does not affect, control, or modify a waterway/body of water - Review concluded	
Migratory Bird Treaty Act (MBTA)	Completed	Project located within a flyway zone	
	Completed	Project does not have potential to take migratory birds - Review concluded	

## RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project PA-10-AK-4585-PW-00043

Title: 181119 - Haines Emergency Protective Measures

Environmental Law/ Executive Order	Status	Description	Comment
Magnuson-Stevens Fishery Conservation and Management Act (MSA)	Completed	Project not located in or near Essential Fish Habitat - Review concluded	
National Historic Preservation Act (NHPA)	Completed	Applicable executed Programmatic Agreement. Activity meets Programmatic Allowance (enter date and # in comments) - Review concluded	FEMA's Programmatic Agreement with the AK State Historic Preservation Officer and the AK Division of Homeland Security and Emergency Management includes Programmatic Allowances for activities that have no effect or limited effect on historic properties, and do not require further review by the SHPO pursuant to Appendices C and D. The scope of work for this project at Damage # 455118; Emergency Protective Measures (Haines Borough Emergency Protective Measures) meets the description of Stipulation 2 in Appendix C; Tier I: I.A.1, II.A, and III.A.6 and Tier II: III.A.1 and A.3 in Appendix D. - pfisher1 - 05/17/2022 15:41:36 GMT*****Rework was for updates to the rental summary that do not impact the previous NHPA review. Determination and comment entered 0/17/2022 still applies.***** - mball4 - 06/21/2022 17:13:06 GMT*****Reworked for cost adjustment, no change to SOW. Previous comment still applies. - pfisher1 - 06/14/2023 22:40:19 GMT
Wild and Scenic Rivers Act (WSR)	Completed	Project is not along and does not affect Wild and Scenic River - Review concluded	

## CONDITIONS

## Standard Conditions:

Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.

This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize federal funding.

If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project PA-10-AK-4585-PW-00013

Title: 435787 - Porcupine Trail Road

NEPA DETERMINATION

<b>Non Compliant Flag:</b> Yes	<b>EA Draft Date:</b>	<b>EA Final Date:</b>
<b>EA Public Notice Date:</b>	<b>EA Fonsi</b>	<b>Level:</b> CATEX
<b>EIS Notice of Intent</b>	<b>EIS ROD Date:</b>	

**Comment** V0- City of Haines is proposing a v0 A&E component to the Cat C project, Porcupine Trail Road 59.41235, -136.02959 to 59.42065, -136.19023]. Applicant will be using contract resources to conduct a) Preliminary Engineering Study and b) A&E design contract create designs to repair 9 locations along 5mi of Porcupine Trail Road. This PW is a version 0 is for the engineering study and does not include approval for construction of any kind. Prior to construction, a subsequent version 1 will need to be formulated and reviewed by EHP. Cost is \$37,175. - jparr2 - 01/21/2022 18:46:25 GMT  
 \*\*Minor wording rework, EHP review still applies - jparr2 - 02/01/2022 16:12:26 GMT  
 \*\*\*CRC updated notes to meet template, SOW is unchanged. - jparr2 - 02/09/2022 17:22:08 GMT  
 SOW: Haines Borough. Work to be completed, Cat C, Version 2 CRC Net Cost \$1,435,834.75: The applicant intends to repair multiple locations on Porcupine Trail road, a two-land, 22ft wide, gravel road. The applicant utilized D1 surface aggregate. HMP: To prevent future damages caused by a similar event, the applicant intends to add Calcium Chloride to road materials.  
 Damaged sites listed below:  
 Site 1 (59.412354, -136.029592) to (59.414085, -136.084124): The applicant intends to repair 1.92 miles of road surface at two locations over the span of 3.84 miles. The applicant also intends to repair the ditches along both sides of the road.  
 Site 2 (59.414467, -136.093800) to (59.416912, -136.112530): The applicant intends to repair 0.6 miles of road surface and ditch repairs.  
 Site 3 (59.420589, -136.135169) to (59.421304, -136.15157): The applicant intends to repair 0.6 miles of road surface and ditch repairs.  
 Site 4 (59.421384, -136.175733) to (59.420224, -136.221962): The applicant intends to repair 1.63 miles of road surface and ditch repairs.  
 - lherriot - 08/19/2022 17:11:11 GMT  
 This project is being de-obligated due to a third-party completing permanent work in the same location of the approved SOW for Phase 1. This is considered a connected action and the third part work completed SOW will need to be considered in the NEPA determination. Additionally Phase II and Phase III permanent work and HMA proposals will need to be reviewed together in the EHP compliance review. - lherriot - 09/21/2023 18:28:46 GMT  
 12/18/23 PA rework was to add HM costs to PW. As noted above NEPA review has not been completed based on project being determined ineligible for PA funding, see Determination Memo. - skilner - 12/19/2023 18:25:38 GMT

CATEX CATEGORIES

Catex Category Code	Description	Selected
*n7	(*n7) Federal Assistance for Structure and Facility Upgrades. Federal assistance for the reconstruction, elevation, retrofitting, upgrading to current codes and standards, and improvements of pre-existing facilities in existing developed areas with substantially completed infrastructure, when the immediate project area has already been disturbed, and when those actions do not alter basic functions, do not exceed capacity of other system components, or modify intended land use. This category does not include actions within or affecting streams or stream banks or actions seaward of the limit of moderate wave action (or V zone when the limit of moderate wave action has not been identified).	Yes

EXTRAORDINARY

Extraordinary Circumstance Code	Description	Selected ?
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## RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project PA-10-AK-4585-PW-00013

Title: 435787 - Porcupine Trail Road

No Extraordinary Circumstances were selected

## ENVIRONMENTAL LAW / EXECUTIVE ORDER

Environmental Law/ Executive Order	Status	Description	Comment
Clean Air Act (CAA)	Not Completed	Project will not result in permanent air emissions - Review concluded	
Clean Water Act (CWA)	Not Applicable	Project would not affect any water of the U.S. - Review concluded	No impacts to waters of the US are anticipated during the proposed v0 A&E action. The subsequent construction version of this project are likely to need additional EHP review, additionally future construction elements are expected to occur within waters of the US and appropriate permits will be needed from USACE. - jparr2 - 01/21/2022 18:40:02 GMTFull review has not been completed based on project being determined ineligible for PA funding, see Determination Memo. - skilner - 12/19/2023 18:22:57 GMT
Executive Order 11988 - Floodplains	Not Applicable	Located in floodplain or effects on floodplain/flood levels	No impacts to floodplains are anticipated during the proposed v0 A&E action. The subsequent construction version of this project will still need EHP review, due to project location within the floodplain. Prior to any construction, the applicant will need to work with the local floodplain coordinator to determine if any additional steps will be needed for construction such as a Floodplain Permit. - jparr2 - 01/21/2022 18:37:16 GMTBased on the effective Flood Insurance Rate Map, the project is in an unmapped area. The project is between 1,500 and 1,600ftt away from Mosquito Lake. According to Google Earth Pro, the project location is uphill from Mosquito Lake at an approximate 3.65 slope. The project is not likely to be in a floodway. - lherriot - 08/19/2022 17:15:11 GMTFloodplain review has not been completed based on project being determined ineligible for PA funding, see Determination Memo. - skilner - 12/19/2023 18:17:07 GMT
	Not Applicable	No adverse effect on floodplain and not adversely affected by the floodplain - Review concluded	
Executive Order 11990 - Wetlands	Not Applicable	No effects on wetlands and project outside wetlands - Review concluded	No impacts to wetlands are anticipated during the proposed v0 A&E action. The subsequent construction version of this project will likely need additional EHP review, since bank stabilization will likely occur within Riverine Wetland. Prior to any construction, any work occurring in



## RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project PA-10-AK-4585-PW-00013

Title: 435787 - Porcupine Trail Road

Environmental Law/ Executive Order	Status	Description	Comment
			wetlands will need USACE and state permits. - jparr2 - 01/21/2022 18:37:36 GMT Per review of the USFWS National Wetlands Inventory (NWI) mapper, accessed 8/18/2022, the project is not located in a wetland. - lherriot - 08/19/2022 17:15:58 GMT Wetland review has not been completed based on project being determined ineligible for PA funding, see Determination Memo. - skilner - 12/19/2023 18:17:37 GMT
Executive Order 12898 - Environmental Justice for Low Income and Minority Populations	Not Applicable	Low income or minority population in or near project area	No impacts to low income or minority populations are anticipated during the proposed v0 A&E action. The subsequent construction version of this project may still need EHP review, however low income or minority populations are not expected to be disproportionately affected during the construction phase due to the anticipated SOW and location of repair. - jparr2 - 01/21/2022 18:37:52 GMT EHP review has not been completed based on project being determined ineligible for PA funding, see Determination Memo. - skilner - 12/19/2023 18:18:13 GMT
	Not Applicable	No disproportionately high and adverse impact on low income or minority population - Review concluded	
Endangered Species Act (ESA)	Not Applicable	No listed species and/or designated critical habitat present in areas affected directly or indirectly by the federal action - Review concluded	No impacts to ESA-listed species are anticipated during the proposed v0 A&E action. The subsequent construction version of this project may still need EHP review, however ESA-listed species are not expected to be affected during the construction phase due to the anticipated SOW and location of repair. - jparr2 - 01/21/2022 18:39:21 GMT Review has not been completed based on project being determined ineligible for PA funding, see Determination Memo. - skilner - 12/19/2023 18:22:27 GMT
Farmland Protection Policy Act (FPPA)	Not Completed	Project does not affect designated prime or unique farmland - Review concluded	
Migratory Bird Treaty Act (MBTA)	Not Applicable	Project located within a flyway zone	No impacts to migratory birds are anticipated during the proposed v0 A&E action. The subsequent construction version of this project may still need EHP review, pending if additional vegetation clearing will be proposed as part of construction phase. - jparr2 - 01/21/2022 18:40:54 GMT Full review has not been completed based on project being determined ineligible for PA funding, see Determination Memo. - skilner - 12/19/2023 18:23:28 GMT

18:27:01

## RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project PA-10-AK-4585-PW-00013

Title: 435787 - Porcupine Trail Road

Environmental Law/ Executive Order	Status	Description	Comment
	Not Applicable	Project does not have potential to take migratory birds - Review concluded	
Magnuson-Stevens Fishery Conservation and Management Act (MSA)	Not Applicable	Project located in or near Essential Fish Habitat	No impacts to essential fish habitat (EFH) are anticipated during the proposed v0 A&E action. The subsequent construction version of this project will need additional EHP review due to work along the Chilkat River (EFH), additionally any bank stabilization proposed shall be bio-engineered. - jparr2 - 01/21/2022 18:41:09 GMT Full review has not been completed based on project being determined ineligible for PA funding, see Determination Memo. - skilner - 12/19/2023 18:23:50 GMT
	Not Applicable	Project does not adversely affect Essential Fish Habitat - Review concluded	
National Historic Preservation Act (NHPA)	Not Applicable	Standard Section 106 review	FEMAs Programmatic Agreement with the AK State Historic Preservation Officer and the AK Division of Homeland Security and Emergency Management includes Programmatic Allowances for activities that have no effect or limited effect on historic properties, and do not require further review by the SHPO pursuant to Appendix C. The scope of work at damage #55349, Porcupine Trail Road and embankment erosion, meets the description of Exemption 7 for the funding of an Architectural and Engineering Study. Once a repair method has been determined and a final scope of work developed the project should be returned for NHPA review. - mball4 - 01/21/2022 16:28:50 GMT*****Rework was for the addition of Scope Note 3 which does not impact the previous review. Comment entered 01/21/2022 still applies.***** - mball4 - 02/01/2022 15:06:28 GMT*****Rework was for the formatting of scope notes and does not impact the previous review. Comment entered 01/21/2022 still applies.***** - mball4 - 02/09/2022 17:14:40 GMT*****Reworked to Phase project into road and surface repair (1) and embankment repair (2). There is an Archaeological site within the APE according to AHRS. Consultation with the AK SHPO initiated on 8/5/2022 and a No Adverse Effect determination was made (Attached). SHPO concurred on 8/10/2022 (Attached). - pfisher1 - 08/22/2022 13:33:43 GMT Historic preservation review has not been fully completed to include all work actually completed which has been determined ineligible for PA funding, see

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project PA-10-AK-4585-PW-00013

Title: 435787 - Porcupine Trail Road

Environmental Law/ Executive Order	Status	Description	Comment
			Determination Memo. - skilner - 12/19/2023 18:21:00 GMT
	Not Applicable	No properties in the project area are 50 years or older or listed on the National Register - Review concluded	
	Not Applicable	Project affects undisturbed ground	
	Not Applicable	Project area has potential for presence of archeological resources	
	Not Applicable	Determination of historic properties affected	
	Not Applicable	NR eligible resources present in project area. (FEMA finding/ SHPO/THPO concurrence attached)	
	Not Applicable	No Adverse Effect Determination. (FEMA finding/ SHPO/THPO concurrence attached) - Review concluded	
Wild and Scenic Rivers Act (WSR)	Not Completed	Project is not along and does not affect Wild and Scenic River - Review concluded	

CONDITIONS

Special Conditions required on implementation of Projects:

Once proposed designs are completed, applicant should work with their floodplain coordinator for any needed permits.

The preliminary Engineering Analysis should evaluate project alternatives, including at least one alternative that evaluates complete or partial road relocation.

Source of condition: Executive Order 11988 - Floodplains

Monitoring Required: No

The Applicant is responsible for obtaining any required federal, state, or local wetland permits prior to initiating work in subsequent construction phases. The sub-grantee shall comply with all conditions of the required permits.

Source of condition: Executive Order 11990 - Wetlands

Monitoring Required: No

Applicant should contact and work with USACE regarding permitting once the preferred alternative and conceptual designs are developed.

Applicant should be aware that USACE permits typically require 60 percent designs.

Source of condition: Clean Water Act (CWA)

Monitoring Required: No

## RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

**Project** PA-10-AK-4585-PW-00013

**Title:** 435787 - Porcupine Trail Road

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Applicant to work with Takshanuk Watershed Council and ADFG to ensure suitable alternatives are considered and that proposed concept designs include bioengineering.

Applicant should include at least one alternative that assesses if feasible to relocate portions of Porcupine Trail Rd.

Source of condition: Endangered Species Act (ESA)

Monitoring Required: No

Applicant should be aware that if substantial additional vegetation clearing is proposed as part of the project, then additional steps will need to be implemented such as confirming no active nests are within the work zone or working with USFWS if active nests need to be removed.

Source of condition: Migratory Bird Treaty Act (MBTA)

Monitoring Required: No

Applicant to work with Takshanuk Watershed Council and ADFG to ensure suitable alternatives are considered and that proposed concept designs include bioengineering.

Applicant should include at least one alternative that assesses if feasible to relocate portions of Porcupine Trail Rd.

Source of condition: Magnuson-Stevens Fishery Conservation and Management Act (MSA)

Monitoring Required: No

V0- Applicant should be aware that if substantial work is proposed outside of the existing facility extents, an Environmental Assessment may be needed. Applicant should coordinate with EHP once a preferred alternative is selected, and conceptual designs are being developed.

Applicant should be aware that 60 percent designs are typically needed for USACE permits.

Source of condition: NEPA Determination

Monitoring Required: No

NEPA Conditions: All borrow or fill material must come from pre-existing stockpiles, material reclaimed from maintained roadside ditches (provided the designed width or depth of the ditch is not increased), or commercially procured material from a source existing prior to the event. For any FEMA-funded project requiring the use of a non-commercial source or a commercial source that was not permitted to operate prior to the event (e.g. a new pit, agricultural fields, road ROWs, etc.) in whole or in part, regardless of cost, the Applicant must notify FEMA and the Recipient prior to extracting material. FEMA must review the source for compliance with all applicable federal environmental planning and historic preservation laws and executive orders prior to a subrecipient or their contractor commencing borrow extraction. Consultation and regulatory permitting may be required. Non-compliance with this requirement may jeopardize receipt of federal funding. Documentation of borrow sources utilized is required at closeout.

Source of condition: NEPA Determination

Monitoring Required: No

**Standard Conditions:**

Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.

This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize federal funding.

If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.



**FEMA**

August 5, 2022

Ms. Judith Bittner  
State Historic Preservation Officer  
Alaska Office of History and Archaeology  
550 West 7th Avenue, Suite 1310  
Anchorage, Alaska 99501-3565  
*Via email*

Re: FEMA Public Assistance, 4585-DR-AK PW13, Porcupine Trail Road Repair

Dear Ms. Bittner:

The U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) proposes to fund Haines Borough (Applicant), through the Alaska Division of Homeland Security and Emergency Management (AKDHS & EM), for a road repair project (Undertaking). This funding is available from FEMA's Public Assistance Program through Presidentially-declared disaster 4585-DR-AK. The proposed Undertaking is being reviewed pursuant to Section 106 of the National Historic Preservation Act, as amended, and the Programmatic Agreement in effect with your office and AKDHS & EM.

### **Proposed Undertaking**

The Undertaking will involve road and embankment repair along the 22-foot-wide Porcupine Trail Road in Haines Borough located approximately 2-mile northwest of Covenant Life, Alaska, as shown on Figures 1 and 2. As a result of heavy rains and overland flooding, segments of the gravel Porcupine Trail Road located between Latitude 59.41235, Longitude -136.02959 and Latitude 59.42022, Longitude -136.22196 washed out the road surface and base, caused ditches to become clogged or washout, and embankment failures. Embankment failures occurred in sections of the road in steep areas or areas adjacent to the Klehini River (see attached Photo Packet). The project will repair the Porcupine Trail Road surface, base, ditches, and embankments back to pre-disaster conditions in-kind and in-place with the possibility for some minor improvements for armoring of ditches and slope stabilization. The overall project locations can be seen in the attached Damage Locations Sheet. Material for the repair will come from the Sunshine Mountain Pit owned by the University of Alaska and located at Latitude 59.39935, -136.05017.

Repair for the Undertaking consists of:

- Resurfacing of damaged road segments with 6 inches of gravel.
- Cleaning out of, and minor expansion of, existing ditch segments along the side of the road.

- Six Downslope Road Embankment Repairs; associated Photo Packet site locations:
  - One 30-foot-long by 16-foot-wide by 30-foot-deep; Site 3 photos
  - One 8-foot-long by 22-foot-wide by 40-foot-deep; Site 4 photos
  - One 6-foot-long by 16-foot-wide by 25-foot-deep; Site 5 photos
  - One 6-foot-long by 16-foot-wide by 25-foot-deep; Site 6 photo
  - One 20-foot-long by 50-foot-wide by 30-foot-deep; Site 7 photos
  - One 30-foot-long by 33-foot-wide by 37-foot-deep; Site 8 photos
- Road base repair ranging from one (1) to two (2) feet in depth and surface repair from segments washout out long the Klehini River.
- Segments of rock riprap armoring replacement along the Klehini River eight (8) feet in height that were washed away.

While the activities associated with this Undertaking would typically meet more than one allowance from the Programmatic Agreement, a review of AHRS discovered a possible historic resource along Porcupine Trail Road, thus we are initiating consultation for the associated activities.

### **Area of Potential Effects**

FEMA has determined that the Area of Potential Effects (APE) is one approximately 7.5 mile long by 50 to 100-foot-wide area that encompasses all of the segments for road, ditch, and embankment repair as well as the staging of equipment (Figure 2).

### **Historic Property Identification and Evaluation**

A review of information from the Alaska Heritage Resource Survey (AHRS) indicates that there is one historic resource within the APE, site SKG-00217. As per the AHRS site card “this number is meant to refer to the now abandoned sections of the old Haines Hwy, rather than the entire highway. The highway was initially surveyed by the military in 1905, and by 1911 a wagon road extended along the N side of the Klehini River to the border. The road followed the general route of the Dalton Trail to Klukshu Lake. In 1943 the road was upgraded to two lanes, as part of the WWII supply effort. The road was only used in summer until 1963. Sections of the highway have been straightened and rerouted.” However, the GPS point location given at Latitude 59.42037, Longitude -136.13484 is located on the south side of the Klehini River on Porcupine Trail Road. Currently, the existing and old Haines Highway are mapped on the north side of the Klehini River. It is not clear if portions of the old Haines Highway ran along the south side of the Klehini River along what is now Porcupine Trail Road, or if the point location for SKG-00217 was digitized in the wrong location.

The purpose of this Undertaking is to repair segments of the gravel road, ditches, and road embankments. The damage to the possible Historic Resource occurred as a result of the natural disaster and this Undertaking will repair the gravel Porcupine Trail Road as close as possible to pre-disaster conditions. A National Register of Historic Places (NRHP) eligibility determination has not been made for SKG-00217. While more research is necessary to fully evaluate SKG-00217, the repair actions included in this Undertaking will not diminish any of the aspects of integrity of the resource nor its ability to convey significance should it be NR eligible. Based on the nature and location of the Undertaking along Porcupine Trail Road in an area previously disturbed by the construction and subsequent improvements to the road, FEMA has determined the likely presence of intact cultural resources is low. Thus, we have determined no further identification and evaluation efforts are warranted.

Ms. Bittner  
August 5, 2022  
Page 3

**Determination of Effects**

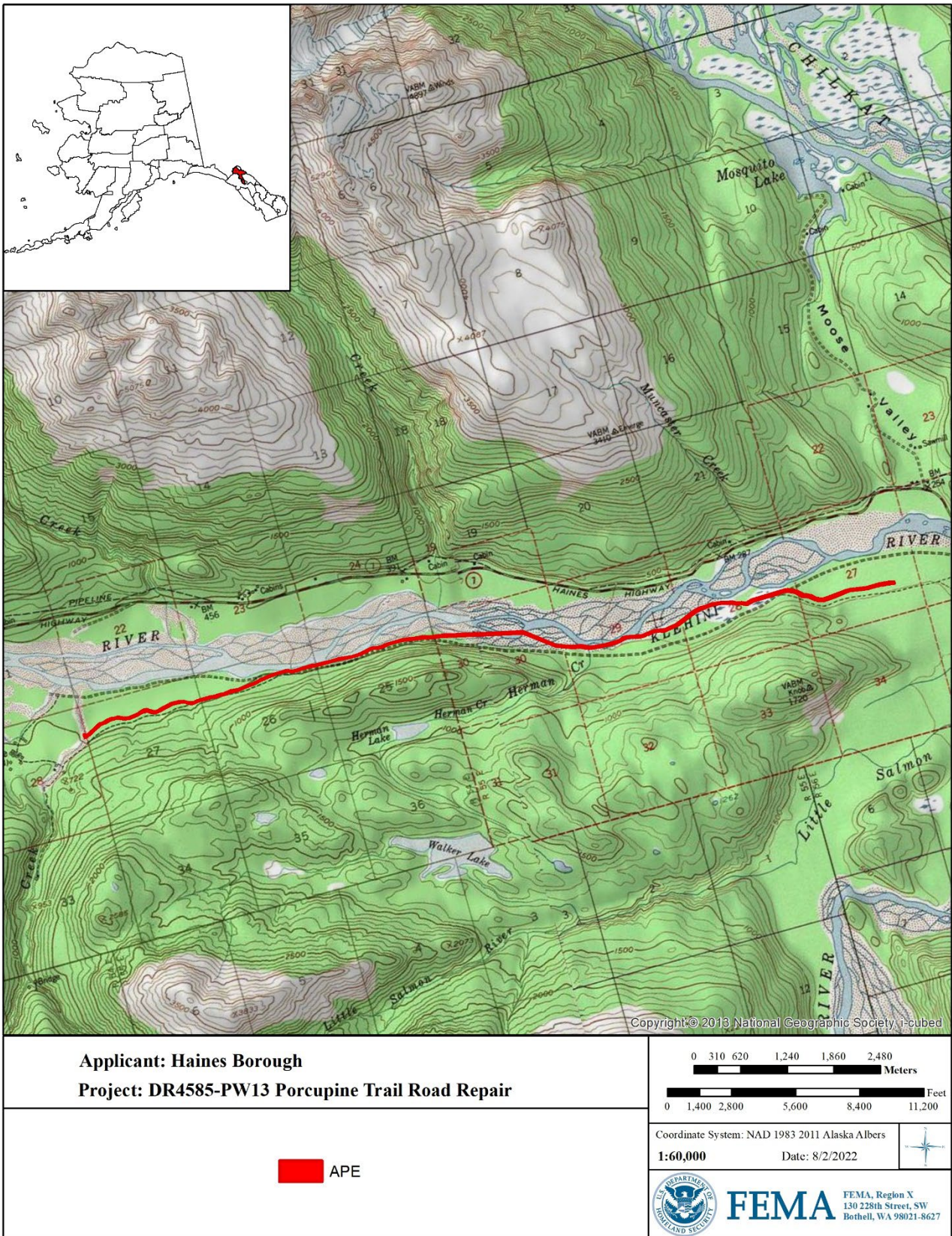
Barring additional information from your office, FEMA has determined the Undertaking will result in No Adverse Effect to Historic Properties. Additionally, we condition our construction related project approvals to protect any unexpected discoveries of historic or archaeological remains during site work. We respectfully request your concurrence to these findings or additional comment. To assist with your review, please find enclosed project area maps, site photos, and design plans. Should you have any questions, please contact Philip Fisher at (425) 471-9018 or [philip.fisher@fema.dhs.gov](mailto:philip.fisher@fema.dhs.gov). Thank you.

Sincerely,

Science Kilner  
Regional Environmental Officer

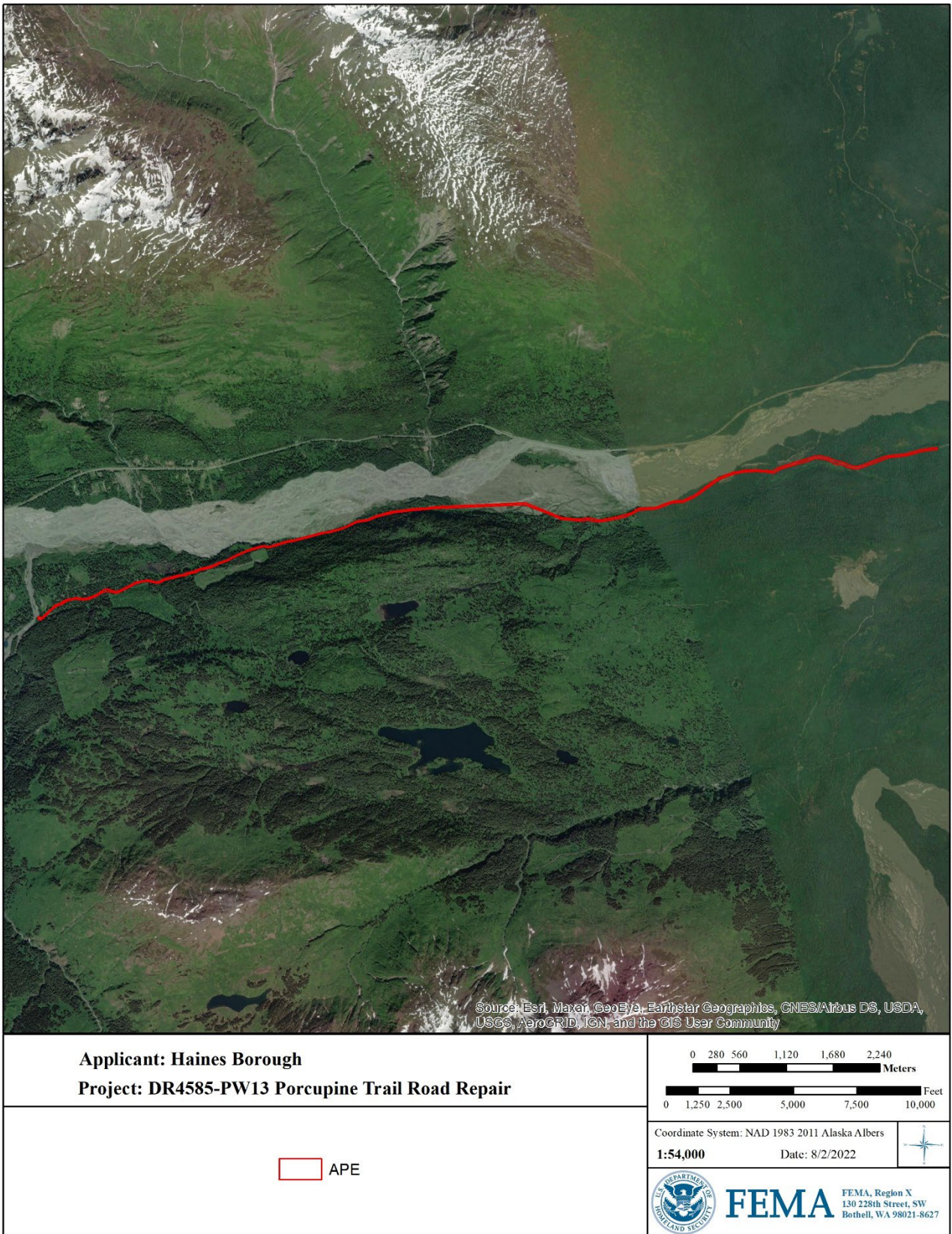
Enclosures:

Damage Locations Sheet  
Damage Photos from Site Inspection



**Figure 1.** Location of the Porcupine Trail Road Repair APE shown on a USGS 1:24,000 topographic map.





**Figure 2.** Location of the Porcupine Trail Road Repair APE shown on a recent aerial image.



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources  
DIVISION OF PARKS AND OUTDOOR RECREATION  
Office of History & Archaeology

550 West 7<sup>th</sup> Avenue, Suite 1310  
Anchorage, AK 99501-3561  
907-269-8700  
<http://dnr.alaska.gov/parks/oha>

August 9, 2022

File No.: 3130-1R FEMA / 2022-00986

Science Kilner  
Regional Environmental Officer  
FEMA, Region X  
130 228<sup>th</sup> Street, SW  
Bothell, WA 98021-8627

Subject: FEMA Public Assistance, 4585-DR-AK PW13, Porcupine Trail Road Repair

Dear Ms. Kilner:

The Alaska State Historic Preservation Officer (AK SHPO) received your correspondence (dated August 5, 2022) on August 8, 2022. Our office has reviewed the undertaking pursuant Section 106 of the National Historic Preservation Act and we offer the following comments for your consideration.

Our office agrees that the property SKG-00217 is unlikely to be adversely affected by the proposed project. However, the Porcupine Trail Road is a historic route and should be considered for eligibility for listing in the National Register of Historic Places (NRHP). This route is an RS 2477 trail, which is also known as the Dalton Trail or RST 1225. We recommend that the historic route receive an AHRS number and be evaluated for NRHP eligibility in the future.

As the proposed undertaking seeks to repair the road to pre-disaster conditions with only some minor improvements to ditches and slope stabilization, our office agrees that a finding of no historic properties adversely affected would be appropriate for the undertaking. Please note that this concurrence is contingent on the *assumed* eligibility for the NRHP for the Porcupine Trail Road. This assumption of eligibility is only for the purposes of this project. No formal determinations on eligibility were made as a result of this review.

As stipulated in 36 CFR 800.3, other consulting parties such as the local government and Tribes are required to be notified of the undertaking. Please note that our office may need to re-evaluate our concurrence if changes are made to the project's scope or design, or comments are received from other consulting parties. Our response does not end the 30-day review period provided to other consulting parties. Should unidentified archaeological resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register of Historic Places eligibility criteria (36 CFR 60.4), in consultation with our office.

August 9, 2022  
Page 2 of 2

Thank you for the opportunity to review and comment. We look forward to continued consultation concerning the project. Please contact Sarah Meitl at 907-269-8720 or [sarah.meitl@alaska.gov](mailto:sarah.meitl@alaska.gov) if you have any questions or if we can be of further assistance.

Sincerely,



Judith E. Bittner  
State Historic Preservation Officer

JEB:sjm