

**Environmental Review
for
Talkeetna Wastewater Treatment Facility Upgrades
Talkeetna, Alaska**



Prepared for:



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Appendix A - Section 106 Consultation

ACRONYMS AND ABBREVIATIONS

ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resource
AKEPIC	Alaska Exotic Plants Information Clearinghouse
AMS	Anchorage and/or Matanuska-Susitna area
APE	Area of Potential Effect
BLM	Bureau of Land Management
BMP	Best Management Practice
CIRI	Cook Inlet Region, Incorporated
DOI	Department of the Interior
EFH	Essential Fish Habitat
FEMA	Federal Emergency Management Agency
HDL	HDL Engineering Consultants, LLC
IPaC	Information for Planning and Conservation
MSB	Matanuska-Susitna Borough
NOAA	National Oceanic and Atmospheric Administration
NPS	National Parks Service
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office
SWPPP	Storm Water Pollution Prevention Plan
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
WWTF	Wastewater Treatment Facility

1.0 Purpose and Need of the Proposal

The community of Talkeetna, Alaska is located in the Matanuska-Susitna Borough (MSB) at the confluence of the Talkeetna and Susitna Rivers (Figure 1). Recent growth in tourism and an expanding residential population has stressed Talkeetna's wastewater system to the point at which it struggles to comply with its State-administered wastewater discharge permit. This section describes the project history, project description, and the project purpose and need.

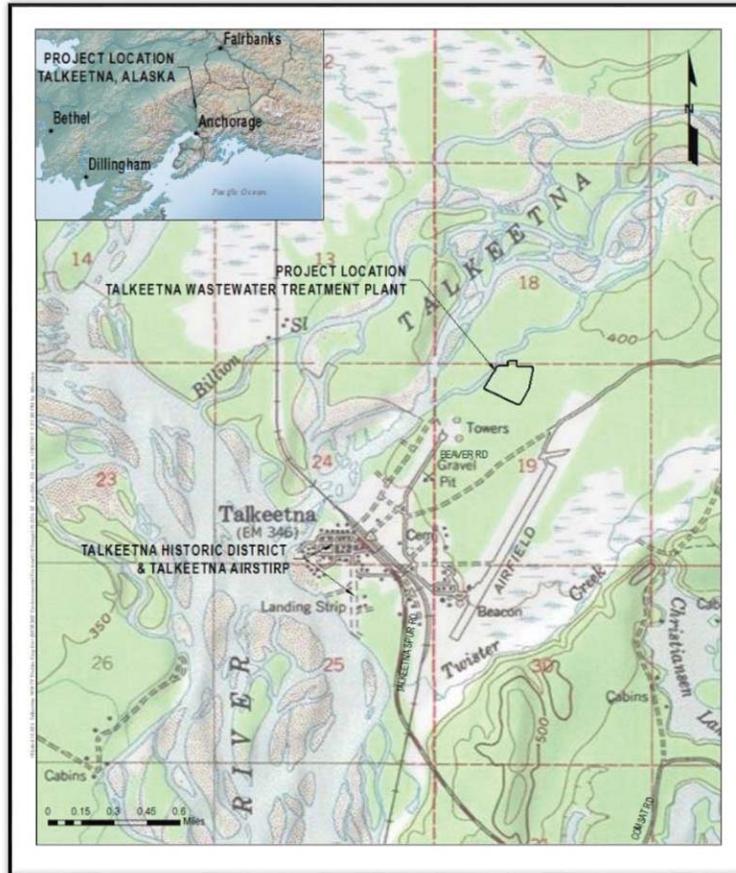


Figure 1: Location and Vicinity Map

1.1 PROJECT HISTORY

The MSB Public Works Department operates a wastewater collection and treatment system to convey wastewater flows from homes and businesses in Talkeetna to a Wastewater Treatment Facility (WWTF) located northeast of the main business and community district. The WWTF and sanitary sewer system were constructed in several phases between 1988 and 1994.

The system consists of 23,000 linear feet of gravity and pressure sewer pipe with three lift stations. Wastewater flows to a lift station on G Street where it is pumped via force main to a series of facultative lagoon cells at the WWTF, which discharge to a constructed wetland for effluent

polishing. Eventually wastewater is discharged via a discharge measurement weir and conveyance pipeline to the Talkeetna Slough, which flows to the Talkeetna River (Figure 2).



Figure 2: Existing Talkeetna Wastewater Treatment Facility (Photo Taken June 2007)

The MSB's Talkeetna WWTF is not in compliance with its State-administered wastewater discharge permit during peak flows. Peak flows occur seasonally and is generated by both the tourism industry and the inflow/infiltration from spring melt and rain events. In November 2015, the Alaska Department of Environmental Conservation (ADEC) issued the MSB a Notice of Intent to Seek Penalties for Clean Water Act Violations for failure to comply with permit effluent limits for fecal coliform and dissolved oxygen.

Currently, the MSB is seeking federal funding for improvement to the facility through the United States Department of Agriculture (USDA) Rural Utilities Service grant program.

1.2 PROJECT DESCRIPTION

HDL Engineering Consultants, LLC (HDL) has been contracted by the MSB to develop a range of alternatives to bring the Talkeetna WWTF into compliance with the State-administered wastewater discharge permit. The purpose of this document is to review potential environmental impacts associated with each alternative identified. This report follows the guidance as outlined in the USDA Rural Utilities Service Bulletin 1794A-602.

1.3 PURPOSE AND NEED OF THE PROPOSAL

The current WWTF is over capacity due to residential population and tourism growth in Talkeetna. The MSB faces potential penalties for Clean Water Act violations for failure to comply with current permit effluent limits for fecal coliform and dissolved oxygen. This analysis identifies a range of alternatives to increase operating capacity of the WWTF and bring it into compliance with current effluent limits for fecal coliform and dissolved oxygen, as stipulated in the current wastewater discharge permit.

2.0 Alternatives to the Proposed Action

Two proposed action alternatives have been identified that would satisfy the project's purpose and need. Additionally, a no-action alternative has been dismissed from analysis because it does not meet state and federal standards for discharge into surface waters. Both alternatives involve expanding the existing facility. Alternative 1 expands the existing facility from 8 acres to 19 acres (increasing the facility footprint by 11 acres, assuming the reuse of existing infrastructure). Alternative 2 expands the existing facility from 8 acres to 14 acres (increasing the facility footprint by 6 acres). Expansion of the current WWTF footprint under either alternative is anticipated to take place entirely on the WWTF property.

2.1 ALTERNATIVE 1 – EXPAND FACULTATIVE LAGOON PER CANADIAN GUIDELINES

Alternative 1 proposes to expand the existing facility per the design guidelines from Alberta, Canada for facultative wastewater treatment lagoons. The configuration for Alternative 1 includes:

- Construction of two new anaerobic lagoon cells.
- Construction of one new storage lagoon cell.
- Construction of a reaeration basin.
- Construction of a chlorination/dechlorination facility.

This alternative removes the existing constructed wetlands and expands the facility footprint from approximately 8 acres to approximately 19 acres. The footprint expansion is located within the WWTF property.

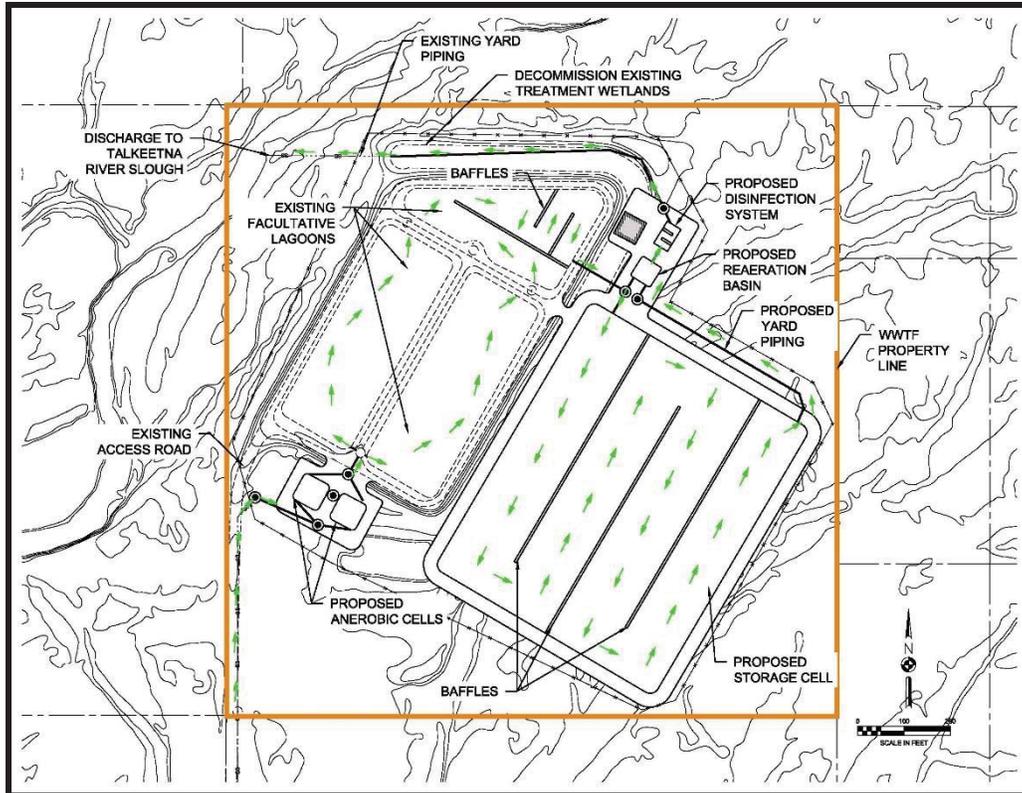


Figure 3: Alternative 1 – Expand Facultative Lagoon per Canadian Guidelines

2.2 ALTERNATIVE 2 – CONVERT FACILITY TO PARTIALLY MIXED AERATED LAGOON

Alternative 2 proposes to expand the existing facility by converting it to a partially mixed aerated facultative lagoon treatment system. The configuration for Alternative 2 includes:

- Construction of four new aerated lagoon cells adjacent to the existing lagoon cells.
- Disinfection facility for chlorination and dechlorination prior to final discharge.

This alternative removes the existing constructed wetlands and expands the facility footprint from approximately 8 acres to 14 acres. The footprint expansion is located within the existing WWTF property.

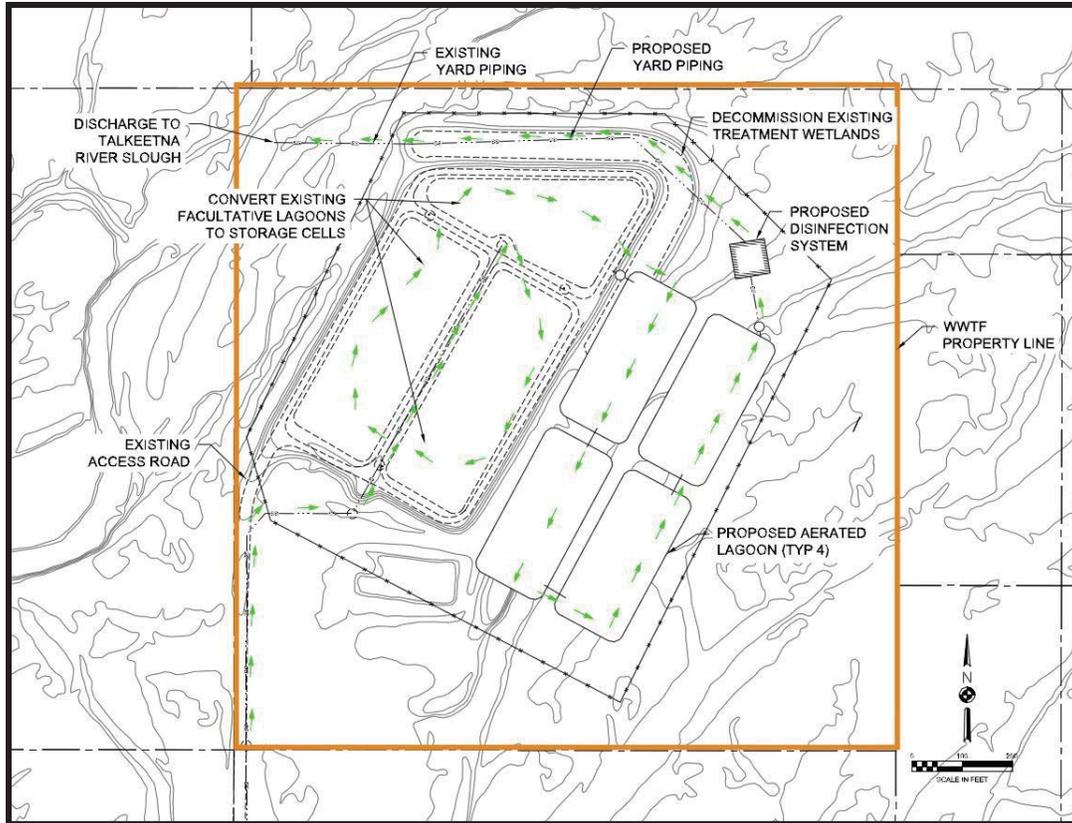


Figure 4: Alternative 2 – Partially Mixed Aerated Lagoon

3.0 Affected Environment/Environmental Consequences

This section presents the components of the environment that may be affected by the proposed build alternatives.

3.1 LAND USE, IMPORTANT FARMLAND, AND FORMALLY CLASSIFIED LANDS

3.1.1 Affected Environment

Land Use

Land use planning documents for the Talkeetna area include the Talkeetna Comprehensive Plan (updated 1999) and the MSB Comprehensive Development Plan (updated 2005). According to the MSB tax parcel viewer, there are eight properties located adjacent to the WWTF, which include privately owned residential lots and undeveloped land owned by Cook Inlet Region, Incorporation (CIRI) (MSB 2017b).

ADEC Guidelines recommend a minimum buffer of 1,000 feet between wastewater facilities and occupied buildings. However, there are no statutory or regulatory requirements prohibiting development of wastewater facilities within the buffer area. According to readily available

information, the existing WWTF footprint is currently approximately 800 feet from one residential building located on an adjacent parcel (Figure 5). Mitigation measures will be implemented to the greatest degree possible to limit the additional impact from operating machinery (blowers, generators, or other noisy equipment) and odors.



Figure 5: Separation Distance between Existing Lagoon and Occupied Building

Important Farmland

There are no areas of important farmland, prime forestland, and/or prime rangeland that exist in the project area as defined by The Farmland Protection Policy Act and USDA Departmental Regulation Number 9500-3, Land Use Policy (USDA 2017).

Formally Classified Lands

There are no national monuments, landmarks, wild and scenic rivers, wilderness areas, state or national parks, reservations, recreational areas, or other formally classified lands in the project area or in the immediate vicinity (U.S. Department of the Interior [DOI] Bureau of Land Management [BLM], National Parks Service [NPS], U.S. Fish & Wildlife Service [USFWS], U.S. Forest Service [USFS] 2017a and 2017b; DOI 2017; NPS 2017).

3.1.2 Environmental Consequences

The Talkeetna Comprehensive Plan describes the use of the project area as appropriate for a wastewater treatment facility. The MSB Comprehensive Development Plan does not specifically address the Talkeetna WWTF; it does provide general principles for development of public water and wastewater facilities, including development that shares space and infrastructure for multiple uses, and development that is based on locally adopted and reasonable standards that are appropriate to the region.

The design concept for Alternative 1 places the eastern edge of a new wastewater cell approximately 200 feet from the eastern property boundary and 250 feet from the nearest residential building. The design concept for Alternative 2 places the eastern edge of a new

wastewater cell approximately 300 feet from the eastern property boundary and 350 feet from the nearest residential building. Neither alternative will require the acquisition of additional property.

3.1.3 Mitigation

The proposed project will conform to applicable land use goals and objectives identified in area planning documents. Consultation with ADEC on December 12, 2016 resulted in a positive reception of both alternatives. Although ADEC cannot provide a specific position on treatment alternatives at this time, they were encouraged by MSB's proactive role in attempting to meet WWTF discharge requirements.

3.2 FLOODPLAINS

3.2.1 Affected Environment

A review of Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (panel number 02170C2804E and 02170C283E) and MSB Floodplain Mapping tools were used to determine the flood hazards at the existing WWTF and surrounding areas. The existing facility is designated as Flood Zone X, meaning the facility is outside of the special flood hazard area but either within the 0.2% (500 year flood) annual chance flood zone or is an area protected by levees from the 1% annual chance flood. Although a formal determination from FEMA was not solicited for this project, the facility likely falls under the latter definition due to the built up nature of the site.

The surrounding area is within Zone AE, meaning base flood elevations have been determined and the area lies within the 100 year annual chance flood zone (FEMA 2017). The project is located outside of the designated floodway.

3.2.2 Environmental Consequences

The project proposes development within an identified flood hazard area. Fill placement within the floodplain would be required, but is not anticipated to cause significant adverse impacts to the floodplain or surrounding areas. Construction of either alternative would result in the following impacts:

- Alternative 1 would impact an additional 11 acres when compared to existing infrastructure.
- Alternative 2 would impact an additional 6 acres when compared to existing infrastructure.

3.2.3 Mitigation

A Floodplain Development Permit will be submitted to the MSB Permit Center and a Hydraulic and Hydrologic Study will be completed prior to construction. In order ensure that the wastewater holding cell design and construction of the disinfection facility will not increase potential flood hazards within the floodplain, consultation with the MSB Permit Center will be completed, prior to construction.

3.3 WETLANDS

3.3.1 Affected Environment

A review of the Cook Inlet Wetlands, MSB Wetlands Viewer, and the USFWS National Wetlands Inventory indicated the project area is primarily located within uplands. The MSB Wetlands Viewer indicates that there are jurisdictional wetlands, identified as a relict glacial drainageway, located directly adjacent to the east side of the existing WWTF footprint. In addition, constructed wetlands are located within the WWTF system, serving to polish effluent wastewater from within the facility prior to discharge to the Talkeetna Sough. For this analysis, both wetland areas are assumed to be jurisdictional. However, a formal wetlands delineation was not conducted at the time of this assessment (Gracz 2015, MSB 2017a, & USFWS 2017a).

3.3.2 Environmental Consequences

Construction of Alternative 1 or 2 would permanently impact approximately 5 acres of wetlands.

3.3.3 Mitigation

The project would be required to incorporate all practicable avoidance and minimization measures in order to qualify for a permit from the U.S. Army Corps of Engineers (USACE). The USACE provided comments during a project scoping meeting that an Individual Permit would be required for any unavoidable wetland impacts. During design, a wetlands delineation and functional assessment will be completed to assist with minimization of wetland impacts and determine whether compensatory mitigation is appropriate.

3.4 HISTORIC PROPERTIES

3.4.1 Affected Environment

A review of the MSB tax parcel viewer identified eight properties adjacent to the MSB property boundary, which include privately owned residential lots and undeveloped land owned by CIRI (MSB 2017b). For the purpose of consulting with the State Historic Preservation Office (SHPO) regarding known historic and archaeological sites, the Area of Potential Effect (APE) was defined for the project and consisted of the existing WWTF property (See Figure 6).

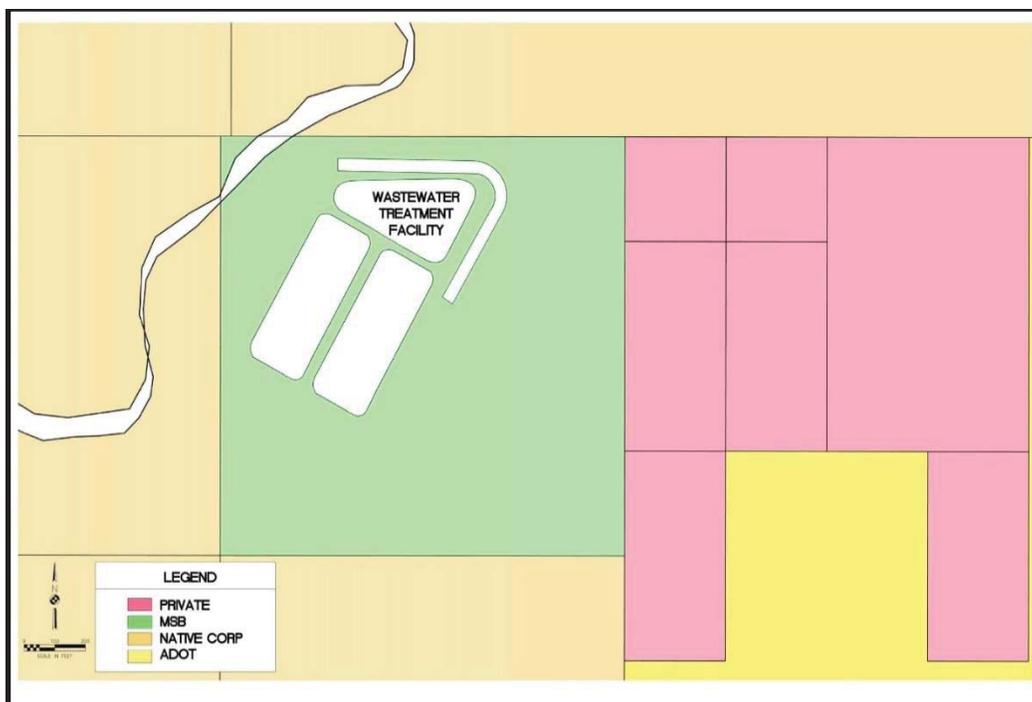


Figure 6: MSB’s Existing Property Boundary and Designated APE

On December 16, 2016, HDL submitted an initiation letter to SHPO. SHPO reviewed the Alaska Heritage Resources Survey database to identify any known cultural resource sites within the APE. SHPO confirmed that they are unaware of any potential or known historic properties that may be of concern within the proposed APE.

On December 20, 2016, HDL submitted a request for comments from other interested parties including CIRI; Knik Tribal Council; Chickaloon Village Traditional Council; and the MSB Planning Department. Currently, no comments have been received.

The USDA consulted with SHPO, requesting concurrence with a Finding of No Historic Properties Affected for both alternatives on January 25, 2017. SHPO concurred with USDA’s finding on February 8, 2017.

3.4.2 Environmental Consequences

The proposed project involves ground disturbing work which may result in the potential to impact unknown cultural, archaeological, or historic sites. Alternative 1 would impact approximately 11 acres while Alternative 2 would impact approximately 6 acres.

3.4.3 Mitigation

If cultural, archaeological, or historic sites are discovered during project construction, all work that may impact these resources would stop until the MSB and the USDA consults with SHPO and other consulting parties to determine the appropriate corrective action.

3.5 BIOLOGICAL RESOURCES

3.5.1 Affected Environment

Threatened and Endangered Species

In November 2012, USFWS issued a statement outlining a modification to their procedure for responding to Section 7 consultation requests for proposed activities occurring in the Anchorage and/or Matanuska-Susitna area (AMS). Currently, there are no federally listed or proposed species or designated or proposed critical habitat under USFWS jurisdiction that occur in the AMS area.

A review of the USFWS Information for Planning and Conservation (IPaC) planning tool indicated no threatened or endangered species within the project area (USFWS 2017b).

Fish and Wildlife Resources

A review of the Alaska Department of Fish & Game (ADF&G) Anadromous Waters Catalog and Fish Inventory, and the National Oceanic and Atmospheric Administration (NOAA) Essential Fish Habitat (EFH) Data Inventory and Mapper were reviewed for the project (ADF&G 2017a & NOAA 2017). According to ADF&G's Anadromous Waters Catalog, the Talkeetna River (AWC 247-41-10200-2370) is anadromous and provides spawning habitat for chum (*Oncorhynchus keta*) and coho (*O. kisutch*) salmon. In addition, Chinook (*O. tshawytscha*), pink (*O. gorbuscha*), and sockeye (*O. nerka*) salmon are indicated as present within the stream. The Talkeetna Slough is the nearest waterbody to the existing WWTF and has a direct connection to the Talkeetna River (ADF&G 2017a). Salmon species have been noted within the Talkeetna Slough. Therefore, it is assumed, for this analysis, that the Talkeetna Slough is an anadromous waterbody.

A review of the USFWS IPaC planning tool identified nine birds protected under the Migratory Bird Treaty Act or the Bald and Golden Eagle Protection Act (see Table 1) (ADF&G 2017b; USFWS 2017b).

Table 1: Migratory Bird Species Identified within the Project Area

Species Name	Season
Bald Eagle (<i>Haliaeetus leucocephalus</i>)	Year Round
Fox Sparrow (<i>Passerella iliaca</i>)	Breeding
Lesser Yellowlegs (<i>Tringa flavipes</i>)	Breeding
Olive-sided Flycatcher (<i>Contopus cooperi</i>)	Breeding
Rusty Blackbird (<i>Euphagus carolinus</i>)	Breeding
Short-eared Owl (<i>Asio flammeus</i>)	Breeding
Solitary Sandpiper (<i>Tringa solitaria</i>)	Breeding
Upland Sandpiper (<i>Bartramia longicauda</i>)	Breeding
Whimbrel (<i>Numenius phaeopus</i>)	Breeding

Vegetation

The proposed site where expansion would take place is mixed birch and spruce forest. A review of the Alaska Exotic Plants Information Clearinghouse (AKEPIC) database identified 12 non-native plant species, at 4 different sites near the entrance to the existing WWTF (see Table 2) (AKEPIC 2017).

Table 2: Non-Native Plant Species Identified within the Project Area

Plant Name	Classification
White Sweetclover (<i>Melilotus albus</i>)	Non-Native Plant
Creeping Buttercup (<i>Ranunculus repens</i>)	Non-Native Plant
Orange Hawkweed (<i>Hieracium aurantiacum</i>)	Non-Native Plant
Oxeye Daisy (<i>Leucanthemum vulgare</i>)	Non-Native Plant
Bigleaf Lupine (<i>Lupinus polyphyllus</i>)	Non-Native Plant
Tall Buttercup (<i>Ranunculus acris</i>)	Non-Native Plant
Alsike Clover (<i>Trifolium hybridum</i>)	Non-Native Plant
Brittlestem Hempnettle (<i>Galeopsis tetrahit</i>)	Non-Native Plant
Foxtail Barley (<i>Hordeum jubatum</i>)	Non-Native Plant
Pineappleweed (<i>Matricaria discoidea</i>)	Non-Native Plant
Bird Vetch (<i>Vicia cracca</i>)	Non-Native Plant
Narrowleaf Hawkweed (<i>Hieracium umbellatum</i>)	Non-Native Plant

3.5.2 Environmental Consequences

Threatened and Endangered Species

Because no listed species under USFWS jurisdiction occur in the AMS area, it is reasonable to conclude that the proposed project, which is confined to AMS, will have no effect on threatened and endangered species or designated critical habitat.

Fish and Wildlife Resources

The project area contains suitable habitat for Bald and Golden eagles as well as other migratory bird species. Development of either alternative will result in permanent loss of suitable habitat for eagles and migratory birds. Alternative 1 would result in a reduction of 11 acres of suitable habitat while Alternative 2 would result in a reduction of 6 acres of suitable habitat.

Vegetation

Vehicular traffic and tracked machinery may contribute to the spread of invasive or non-native species during vegetation clearing.

3.5.3 Mitigation

Fish and Wildlife Resources

Impacts to the Talkeetna River and the Talkeetna Slough are not anticipated. However, storm water Best Management Practices (BMPs) will be used during construction to stabilize slopes and prevent mobilization of particulate matter to adjacent vegetated low points.

Prior to construction, an eagle nest survey would be conducted to determine the presence of active nests. If active bald eagle nests are found within 660 feet of the WWTF property (primary and secondary protection zones), then either construction activities will be prohibited during sensitive nesting time periods or monitoring would be conducted during the nesting period according to USFWS protocol.

To avoid disturbance to migratory birds and their nests, the contractor would follow the USFWS's Recommended Time Periods for Avoiding Vegetation Clearing in Alaska in Order to protect migratory birds (May 1 to July 15) (USFWS 2017c).

Vegetation

The MSB would comply with all federal, state, and local laws and regulations regarding invasive species during construction of the proposed project. Soil stabilization materials, top soils, and seed mixes that are free from noxious weeds would be used. If these materials are not available, locally produced products would be used to minimize potential importation of new weed propagules from outside Alaska. The majority of disturbed areas would be reseeded and vegetated with native species in accordance with the recommendations of the Alaska Department of Natural Resources (ADNR) and the Revegetation Manual (Wright 2008).

3.6 WATER QUALITY ISSUES

3.6.1 Affected Environment

A review of ADEC's Impaired Waters mapping application and Alaska's FINAL 2012 Integrated Water Quality Monitoring and Assessment Report indicated there are no Section 303(d)-listed impaired water bodies in the vicinity of the project (ADEC 2017a). There are no municipal separate storm sewer systems in the area. A review of the ADEC Drinking Water Protection Areas mapping application indicated there are no drinking water protection areas in the vicinity of the project. Three private subsurface water rights have been identified within 0.5-mile of the WWTF property (ADEC 2017b).

Potential receiving waters for the disturbed area include the Talkeetna Slough and wetlands associated with the Talkeetna River. This slough does have an instream flow reservation, established by ADF&G, which includes the Talkeetna River and its associated sloughs and floodplains, from the mouth at the confluence with the Susitna River upstream to the confluence with Sheep River.

3.6.2 Environmental Consequences

Storm water within the construction area may sheet flow off gravel roadways into adjacent ditches and low-lying vegetated areas where it infiltrates into the ground or evaporates. Waters of the U.S. are present (Talkeetna Slough) adjacent to the WWTF; however, there is low potential for

storm water discharge to reach any water bodies through surface conveyance. Impacts to private wells or other public drinking water sources are not anticipated.

Construction of either Alternative 1 or 2 would involve ground disturbing work which could potentially lead to increase sedimentation to adjacent low lying areas. Alternative 1 will have a greater impact compared to Alternative 2 since the proposed project footprint is approximately 5 acres larger.

3.6.3 Mitigation

A Storm Water Pollution Prevention Plan (SWPPP) would be prepared for the proposed project. Both Alternatives 1 and 2 would include BMPs to be used during construction to stabilize slopes and prevent sedimentation and would comply with the Alaska Pollutant Discharge Elimination System Construction General Permit required for this project.

Post-construction BMPs prior to revegetation, including drainage conveyance and storage, will be designed to reduce the potential for water quality impacts. No permanent adverse water quality impacts are anticipated as a result of the proposed project.

3.7 SOCIO-ECONOMIC ISSUES/ENVIRONMENTAL JUSTICE

3.7.1 Affected Environment

The proposed project is located approximately 0.5-mile from downtown Talkeetna and is primarily surrounded by undeveloped land. A small number of private residential properties are located east of the proposed project. Currently, the closest residential building is located approximately 800 feet southeast of the existing WWTF footprint and approximately 50 feet from the WWTF property. The majority of residents in the Talkeetna area are serviced by the MSB water/wastewater system. Few residences, outside the service area, are supported by individual water wells and septic systems.

3.7.2 Environmental Consequences

The project will have no disproportionate environmental effects on minority and/or low-income populations.

3.8 AIR QUALITY

3.8.1 Affected Environment

A review of the U.S. Environmental Protection Agency list of Nonattainment and Maintenance Areas indicated the proposed project is not within a non-attainment or maintenance area for any National Ambient Air Quality Standards (EPA 2017).

3.8.2 Environmental Consequences

The operation of construction equipment may lead to a decrease in air quality because of increased airborne dust and emission-related particulate matter. However, changes in air quality are expected to be temporary and minor. No permanent adverse impacts to air quality from either alternative are expected to occur as the proposed project would not result in a permanent substantial increase in emissions in the project area

3.8.3 Mitigation

Air quality would be maintained through the use of BMP's such as watering disturbed surface areas, sweeping, stabilizing construction entrances/exits, and use of equipment emission control devices.

4.0 Summary of Mitigation

This section outlines the environmental commitments established in the mitigation section of the environmental review (see Table 3). In addition to the mitigations already identified during permitting, consulting agencies may provide further mitigation requirements depending on the final design.

Table 3: Project Specific Mitigation

Regulatory Agency/Guidance	Mitigation Commitment	Implementation
FEMA /MSB Permit Center	Obtain a Floodplain Development Permit.	Required by Municipal Law
MSB Permit Center	Design WWTF to withstand possible flood events	MSB Review
USACE	Complete a jurisdictional wetlands determination.	Required by Federal Law
USACE	Obtain a Section 404 permit authorization	Required by Federal Law
SHPO	Notify SHPO if any cultural, archaeological, or historic sites are discovered during project construction	Required by Federal Law
USFWS	Conduct eagle and eagles' nest survey prior to construction	Recommended Practice under Section 7 Consultation
USFWS	Avoid vegetation clearing between May 1 and July 15.	Vegetation Clearing Guidance
ADNR	Disturbed areas reseeded and vegetated with native species	Revegetation Manual
AKEPIC	Site survey to identify the location of any known invasive species	Contractor to complete
SWPPP	Stabilize slopes and prevent mobilization of particulate matter	Contractor to complete
SWPPP	Use BMP's anywhere practicable during construction	Contractor to complete

5.0 Correspondence

5.1 AGENCY CORRESPONDENCE

Agency and government representatives were contacted via mail and are listed in Table 4.

Table 4: Persons and Agencies Consulted

Contact	Affiliation
Judith Bittner	ADNR - State Historic Preservation Office
Tasha Deordoff	U.S. Department of Agriculture
Steve Lindamood	U.S. Army Corps of Engineers, Alaska District Regulatory Division
Jessica Winnestaffer	Chickaloon Village Traditional Council
Jason Brune	Cook Inlet Region, Incorporated
Theo Garcia	Knik Tribal Council
Eileen Probasco	MSB Planning Department

5.2 AGENCY CONSULTATION

The proposed project is anticipated to be funded through USDA's Rural Utilities Service grant program, which makes the USDA the lead agency. Consultation with USDA has been continuous throughout the project development.

On December 16, 2016, HDL submitted an initiation letter to SHPO. The USDA consulted with SHPO, requesting concurrence with a finding of No Historic Properties Affected for both alternatives on January 25, 2017. SHPO concurred with USDA's finding on February 8, 2017. Further consultation with SHPO is summarized in Section 3.4.

On December 20, 2016, HDL submitted a request for comments from other interested parties including:

- CIRI
- Knik Tribal Council
- Chickaloon Village Traditional Council
- MSB Planning Department

No comments have been received from any of the interested parties.

During design of the selected alternative, consultation with the USACE and the MSB – Permit Center will occur under Section 404 and Floodplain Development permitting.

6.0 Permits and Approvals

Required permits and consultation required for the proposed project are listed in Table 5.

Table 5: Permits and Approvals

Permit or Approval Title	Responsible Agency	Notes
Floodplain Development	MSB – Permit Center	Permit to be Obtained
Section 404 Permitting	USACE	Permit to be Obtained
Determination of No Historic Properties Affected	ADNR - SHPO	Concurrence received February 8, 2017

7.0 List of Preparers

Those involved with the preparation of this document is listed in Table 6.

Table 6: List of Preparers

Name	Affiliation	Title	Area(s) of Input
Jim Jenson	MSB	Project Manager	Project Management
David Lundin, P.E.	HDL	Contract Manager	Document Review, QA/QC
Chris Bowman, P.E.	HDL	Engineering Project Manager	Project Management, Design
Nicole Yount, EIT	HDL	Engineering Assistant	Design
Heather Campfield	HDL	Environmental Manager	Document Review, QA/QC
Brooke Therrien	HDL	Environmental Specialist	Document Preparation

REFERENCES

- ADEC. 2017a. Alaska's Water Quality Map. Last accessed on January 13, 2017.
<http://dec.alaska.gov/water/wqsar/map.html>.
- ADEC. 2017b. Drinking Water Protection Map. Last accessed on January 11, 2017.
https://dec.alaska.gov/eh/dw/DWP/protection_areas_map.html.
- ADF&G. 2017a. ADF&G Atlas to the *Catalog of Waters Important to the Spawning, Rearing or Migration of Anadromous Fishes*. Last accessed on January 12, 2017.
<https://www.adfg.alaska.gov/sf/SARR/AWC/index.cfm?ADFG=maps.interactive>.
- ADF&G. 2017b. Bald Eagle (*Haliaeetus leucocephalus*) Species Profile. Last accessed on November 2, 2016. <http://www.adfg.alaska.gov/index.cfm?adfg=baldeagle.main>.
- AKEPIC. 2017. AKEPIC Data Portal. Last accessed January 10, 2017.
<http://aknhp.uaa.alaska.edu/apps/akepic/>.
- BLM, NPS, USFWS, & USFS. 2017a. National Wild and Scenic Rivers System. Last accessed January 13, 2017. <https://www.rivers.gov/alaska.php>.
- BLM, NPS, USFWS, & USFS. 2017b. Wilderness.net. Last accessed January 13, 2017.
<http://www.wilderness.net/map.cfm>
- DOI. National Monuments. Last accessed January 13, 2017.
https://www.blm.gov/wo/st/en/prog/blm_special_areas/NLCS/monuments.html
- EPA. 2017. Nonattainment Areas for Criteria Pollutants (Green Book). Last accessed on January 13, 2017. <https://www.epa.gov/green-book>.
- FEMA. 2017. FEMA Flood Map Service Center: Welcome!. Last accessed on January 12, 2017.
<https://msc.fema.gov/portal>.
- Gracz, Mike. 2015. Cook Inlet Wetlands. Last accessed on January 13, 2017.
<http://www.cookinletwetlands.info/>.
- MSB. 2017a. Mat-Su Borough Wetlands Viewer. Last accessed on January 13, 2017.
<http://msb.maps.arcgis.com/home/item.html?id=15658472427f459ab6d73b1d3ca5ab77>.
- MSB 2017b. MSB Parcel Viewer. Last accessed on January 10, 2017.
http://maps.matsugov.us/msb-gvh2.4.0/Index.html?configBase=http://maps.matsugov.us/Geocortex/Essentials/msb-ge4.3.0/REST/sites/MatsuServicesSite/viewers/MatsuServicesSite_hv/virtualdirectory/Resources/Config/Default.
- NOAA. 2017. NOAA Habitat Conservation. Last accessed on January 13, 2017.
<http://www.habitat.noaa.gov/protection/efh/efhmapper/>.

- NPS. 2017. National Park Service. Last accessed January 13, 2017.
<https://www.nps.gov/state/ak/index.htm?program=parks>
- USDA. 2017. Natural Resources Conservation Service Alaska. Last accessed on January 17, 2017.
https://www.nrcs.usda.gov/wps/portal/nrcs/detail/ak/soils/surveys/?cid=nrcs142p2_035988.
- USFWS. 2017a. National Wetland Inventory. Last accessed on January 12, 2017.
<https://www.fws.gov/wetlands/Data/Mapper.html>.
- USFWS. 2017b. IPaC Information for Planning and Conservation. Last accessed on January 12, 2017. <https://ecos.fws.gov/ipac/>.
- USFWS. 2017c. Land Clearing Timing Guidance for Alaska. Last accessed on January 12, 2017.
https://www.fws.gov/alaska/fisheries/fieldoffice/anchorage/pdf/vegetation_clearing.pdf.
- Wright, Stoney J. 2008. A Revegetation Manual for Alaska. Last accessed on January 13, 2017.
<http://dnr.alaska.gov/ag/RevegManual.pdf>.

APPENDIX A

Section 106 Consultation

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State Historic Preservation Officer

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↑

2.8.17

3301R USDA-RD



United States Department of Agriculture

Rural Development January 25, 2017

Alaska field office

510 L Street
Suite 410
Anchorage, AK
99501

Voice 907.271.2424
Fax 855.201.1074

Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 West 7th Avenue, Suite 1310
Anchorage, Alaska 99510-3565

MSB No Historic Properties Affected
Alaska State Historic Preservation Officer
Date: 2.8.17 **File No.:** 3301R USDA-RD
2016-01564
Please review: 36 CFR 800.13 / A.S. 41.35.070(d)

RE: Section 106 Consultation
Request for Concurrence Finding of No Historic Properties Affected
Matanuska-Susitna Borough Talkeetna Wastewater Treatment Facility

Dear Ms. Bittner:

The Matanuska-Susitna Borough (MSB), in cooperation with the U.S. Department of Agriculture (USDA) is proposing to upgrade the Wastewater Treatment Facility (WWTF) in Talkeetna, Alaska. The existing WWTF is not in compliance with its State-administered wastewater discharge permit. The USDA is proposed to provide assistance with upgrades to the WWTF. The project is located within Section 19 of Township 26 North, Range 4 West of the Seward Meridian, and within U.S. Geological Survey Quadrangle Talkeetna B-1 (Figures 1 & 2).

Pursuant to 36 CFR 800.4(d)(1), implementing regulations of Section 106 of the National Historic Preservation Act, the USDA requests your concurrence with our finding of No Historic Properties Affected.

Project Purpose and Need

The current WWTF is over capacity due to recent residential growth and tourism in Talkeetna. The MSB faces potential penalties for Clean Water Act violations for failure to comply with current permit effluent limits for fecal coliform and dissolved oxygen. The purpose of this project is to increase operating capacity of the WWTF and bring it into compliance with current effluent limits for fecal coliform and dissolved oxygen, as stipulated in the current wastewater discharge permit.

- Wastewater Treatment System

Area of Potential Effect

The Area of Potential Effect (APE) for the project consists of the MSB's property parcel boundary (Figure 3).

USDA is an equal opportunity provider and employer.

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form (PDF), found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.



Rural Development January 25, 2017

Alaska field office

510 L Street
Suite 410
Anchorage, AK
99501

Voice 907.271.2424
Fax 855.201.1074

Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 West 7th Avenue, Suite 1310
Anchorage, Alaska 99510-3565

RE: Section 106 Consultation
Request for Concurrence Finding of No Historic Properties Affected
Matanuska-Susitna Borough Talkeetna Wastewater Treatment Facility

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Identification Efforts

A review of the MSB tax parcel viewer identified eight properties adjacent to the APE which includes:

- Three privately owned residential lots located east of the APE;
- Two parcels of undeveloped land owned by Cook Inlet Regional Incorporation (CIRI) located to the north and west of the APE; and
- Three parcels of undeveloped land that according to the MSB tax parcel viewer does not contain any ownership or building data located south, southwest, and northwest of the APE.

According to the MSB tax parcel viewer the surrounding properties are predominantly undeveloped, with the exception of a single family residence with several buildings on the adjacent property to the east.

The NRHP on-line database, reviewed on December 5, 2016, indicated that there are two sites within 1-mile of the WWTF that are listed on the NRHP. These include the Talkeetna Airstrip and the Talkeetna Historic District located in/near downtown Talkeetna. Impacts to either site are not anticipated.

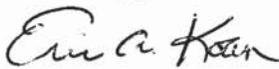
On December 16, 2016, HDL Engineering Consultants, on behalf of the USDA, initiated consultation with SHPO. On December 28, 2016, the SHPO acknowledged initiation and provided results of a presence/absence check for known cultural resource sites within the proposed project area. A review of the Alaska Heritage Resources Survey (AHRIS) database indicates there are no known cultural resource sites within the identified APE.

Consultation Efforts

Consultation letters to other interested parties were mailed out on December 20, 2016 to the following: Chickaloon Village Traditional Council; CIRI; Knik Tribal Council; and MSB Planning Department. To date, no comments have been received.

We respectfully request concurrence with our finding of No Historic Properties Affected. If you have any questions regarding this letter please contact the undersigned at (907) 271-2424, Ext 102, or by email at eric.koan@ak.usda.gov.

Sincerely,



ERIC A KOAN
WEP SPECIALIST

Attachments:

- Figure 1: Location and Vicinity Map
- Figure 2: Existing Talkeetna Wastewater Treatment Facility
- Figure 3: Alternative 1 Layout Design
- Figure 4: Alternative 2 Layout Design

CC: Matanuska-Susitna Borough

Koan, Eric - RD, Anchorage, AK

From: Brooke A. Therrien <BTherrien@HDLAlaska.com>
Sent: Wednesday, January 18, 2017 11:40 AM
To: Koan, Eric - RD, Anchorage, AK
Subject: FW: Talkeetna Wastewater Treatment Facility--Initiation of Section 106 Consultation, SHPO Comments

See below.

From: Johnson, McKenzie S (DNR) [mailto:mckenzie.johnson@alaska.gov]
Sent: Wednesday, December 28, 2016 11:16 AM
To: Brooke A. Therrien <BTherrien@HDLAlaska.com>
Cc: tasha.deardorff@ak.usda.gov
Subject: Talkeetna Wastewater Treatment Facility--Initiation of Section 106 Consultation, SHPO Comments

File No.: 3130-1R USDA-RD
2016-01564

The Alaska State Historic Preservation Office (AKSHPO) received the subject initiation letter on December 19th, 2016 (dated December 16th, 2016).

We offer the following comments:

The correspondence requested that our office conduct a presence/absence check for known cultural resource sites. Upon review of the Alaska Heritage Resources Survey (AHRS) database, there are no reported cultural resource sites within the identified Area of Potential Effect (APE). At this time we are unaware of any potential or known historic properties that may be of concern for the proposed project scope. Please keep in mind that only a small portion of Alaska has been surveyed for cultural resources, therefore there is still the possibility that previously unidentified resources are located within the APE.

On pg. 3 of the correspondence our concurrence is requested with a finding of 'no historic properties affected' for the subject project. While we may agree that this is an appropriate finding of effect at present based on what is known for the project and APE, we are not supposed to provide concurrence to the applicant without prior authorization from the lead federal agency when operating under Section 106 regulations. USDA-RD has previously indicated that they prefer the applicant to initiate consultation with us to assist with identifying any potential concerns, but they would still like to remain the primary correspondent for the final request for concurrence. As such, we have Cc'd the identified USDA-RD contact for their own records so they may submit the final finding of effect once determined.

Although the APE as currently defined may encompass any one of the alternative designs, the specific layout does ultimately affect the direct footprint of impact. If the final design is not known at the time of USDA-RD's submittal we suggest that the alternatives are each presented and incorporated into the assessment if feasible.

As a minor technical clarification, the subject line as well as the preliminary determination found on pg. 2 indicate a finding of 'no potential to effect'. Under Section 106 the term 'no potential to effect' has a specific meaning [see 36 CFR 800.3(a)(1)] that implies that the project's components have *no potential* to physically affect historic properties *assuming they were present*. Typically these are administrative type projects (hiring new people, ordering mail supplies, cleaning), or other actions that do not have the potential to physically alter or otherwise disturb the current natural or built environment of the APE. This is not technically a 'finding' but a decision on whether or not an undertaking requires review under Section 106 based on the nature of the project. If the project had *no potential* to affect historic properties, consultation under Section 106 would not be required.

Thank you for the opportunity to comment and review. Please let me know if you have any questions, otherwise we look forward to receiving the final submittal for review from USDA-RD.

Mckenzie S. Johnson
Archaeologist I, Review and Compliance
Alaska State Historic Preservation Office/Office of History and Archaeology
550 W. 7th Ave, Suite 1310
Anchorage, AK 99501
Phone: 907-269-8726
E-mail mckenzie.johnson@alaska.gov

OHA is updating Alaska's historic preservation plan and wants to know what historic places matter to you. Please share your thoughts by taking a short survey that is available online at:
<http://www.surveymonkey.com/r/AKHPP>

December 16, 2016

Judith Bittner
 State Historic Preservation Officer
 Alaska Office of History and Archaeology
 550 West 7th Avenue, Suite 1310
 Anchorage, Alaska 99510-3565

RE: Combined Initiation and Finding of No Potential to Effect
 Section 106 Review Process
 Matanuska-Susitna Borough - Talkeetna Wastewater Treatment Facility

Dear Ms. Bittner:

The Matanuska-Susitna Borough (MSB) has applied to the U.S. Department of Agriculture (USDA) Rural Development for federal financial assistance to upgrade the Waste Water Treatment Facility in Talkeetna, Alaska. HDL Engineering Consultants, LLC (HDL), on behalf of the MSB, has been authorized by the USDA to initiate the consultation process required under Section 106 of the National Historic Preservation Act (NHPA) (see attached authorization). Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties.

Pursuant to 36 CFR 800.4(d)(1), implementing regulations of Section 106 of the National Historic Preservation Act, we are combining initiation of Section 106 consultation and our finding that no historic properties would be affected by the proposed project.

Proposed Project

The Matanuska-Susitna Borough (MSB) is proposing to upgrade the Talkeetna Wastewater Treatment Facility (WWTF) in Talkeetna, Alaska. The existing WWTF is not in compliance with its State-administered wastewater discharge permit (see attached project description for further information). The project is located within Section 19 of Township 26 North, Range 4 West of the Seward Meridian, and within U.S. Geological Survey Quadrangle Talkeetna B-1 (Figures 1 & 2).

Area of Potential Effect

The Area of Potential Effect (APE) for the project consists of the property parcel boundaries (Figure 3).

CIVIL
ENGINEERING

GEOTECHNICAL
ENGINEERING

TRANSPORTATION
ENGINEERING

ENVIRONMENTAL
SERVICES

PLANNING

SURVEYING
& MAPPING

CONSTRUCTION
ADMINISTRATION

MATERIAL
TESTING

RIGHT-OF-WAY
SERVICES

Identification Efforts

To date, no project specific cultural or historic resource field surveys or other identification efforts have taken place. A review of the MSB tax parcel viewer identified eight properties adjacent to the APE which includes;

- Three privately owned residential lots located east of the APE;
- Two parcels of undeveloped land owned by Cook Inlet Regional Incorporation (CIRI) located to the north and west of the APE; and
- Three parcels of undeveloped land that according to the MSB tax parcel viewer does not contain any ownership or building data located south, southwest, and northwest of the APE.

According to the MSB tax parcel viewer the surrounding properties are predominantly undeveloped, with the exception of a single family residence with several buildings on the adjacent property to the east. One of the buildings located on this property was built in 1970 which makes it eligible for listing on the National Register of Historic Places (NRHP). The current design concept places the eastern edge of the new lagoon cell approximately 200 feet from the eastern property boundary and 250 feet from the nearest residential building.

The NRHP on-line database, researched on December 5, 2016, indicated that there are two sites within 1-mile of the WWTF that are listed on the NRHP. These include the Talkeetna Airstrip and the Talkeetna Historic District located in/near downtown Talkeetna. Impacts to either site are not anticipated.

The MSB respectfully requests a representative from the Office of History and Archaeology to research the Alaska Heritage Resource Survey (AHRS) Files to determine if there are known historical and archaeological resources that have been identified within or near the proposed project's APE. Currently, neither the U.S. Department of Agriculture (USDA) or the MSB employ staff that meet the Secretary of the Interior's requirements to conduct research of the AHRS files.

Consultation Efforts

Consultation with other interested parties will include; Chickaloon Village Traditional Council; CIRI; Knik Tribal Council; and MSB Planning Department.

Preliminary Determination

Based on the results of our identification efforts and assuming no known sites of historical or archaeological significance exist within the WWTF property, the USDA and the MSB find the project has no potential to effect historic properties.

RE: Section 106 Review Process
December 16, 2016
Page 3 of 3

We respectfully request concurrence with our no historic properties affected finding. In addition, we request your approval to proceed with the project without completing a project specific cultural resources survey. If you have any questions regarding this letter please contact Brooke Therrien by mail at 3335 Arctic Boulevard, Anchorage, Alaska, 99503, by phone at (907) 564-2159, or by email at BTherrien@HDLAlaska.com; or you may contact USDA Rural Development directly by calling Tasha Deardorff by phone at (907) 271-2424, Ext 118, or by email at Tasha.Deardorff@ak.usda.gov.

Sincerely,
HDL Engineering Consultants, LLC



Brooke Therrien
Environmental Specialist

Attachments:

- Section 106 Consultation Authorization
- Project Description
- Figure 1: Location and Vicinity Map
- Figure 2: Existing Talkeetna Wastewater Treatment Facility
- Figure 3: Area of Potential Effect and Proposed Development





Rural Development

510 L Street,
Suite 410
Anchorage, AK
99501

Voice 907.271-2424

Section 106 Consultation Authorization and Instructions to Applicant

DATE: 12/13/2016

TO: Matanuska-Susitna Borough - Talkeetna Wastewater Treatment Facility
Palmer, Alaska

HDL Engineering Consultants, LLC
Anchorage, AK

FROM: USDA Rural Development
510 L Street, Suite 410
Anchorage, AK

SUBJECT: Initiating Consultations under the Section 106 Process

In order for Rural Development to make a decision on the Talkeetna application, an environmental review must first be completed. Among other items, this environmental review includes an analysis of the potential for your proposed project to impact sites that are listed or eligible for listing on the National Register of Historic Places. This analysis is required by Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations located at 36 CFR Part 800. NHPA requires Rural Development to work closely with the State Historic Preservation Office (SHPO), Tribes, and other consulting parties to take into account the effects of your project on historic properties and to attempt to find ways to avoid, minimize, or mitigate adverse effects, to the extent practicable.

Receipt of this letter from Rural Development authorizes you to initiate consultation under the Section 106 process. Please proceed as follows:

1. Review the attached letter (Attachment 1) and the required supporting documentation (Attachment 2).
2. Your Rural Development representative will:
 - Answer any questions you have about completing the letter and the supporting documentation;
 - Assist you in a preliminary description of the area of potential effects* (APE);
 - Assist you in developing a preliminary list of the consulting parties.

USDA is an equal opportunity provider, employer, and lender.

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form (PDF), found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Please complete the following:

1. Send the completed letter (Attachment 1) and the supporting documentation (contained in Attachment 2) to each of the consulting parties on the list (retain a dated copy of each letter for your records).
2. Include a copy of this Authorization/Instructions document with your letter to the SHPO and/or THPO.
3. Allow 30 days for receipt of comments. Incorporate any comments received into the environmental information/report (depending on Rural Development program) being prepared as part of your application to Rural Development, and attach copies of each letter you sent out and comments received to the environmental information/report.

The initiation of consultation is the first step in the Section 106 process. This authorization permits you, as an applicant (or, by proxy, the applicant's consultant), to initiate this consultation process and to assist Rural Development in collecting and evaluating information to facilitate timely compliance with Section 106 requirements. Rural Development remains legally responsible for making all formal determinations and findings under the Section 106 process.

Please be aware that some proposals require the services of a professional consultant. For example, an archeological survey may be needed before the Section 106 process can be concluded. Your Rural Development representative can provide you further guidance, if there is a need for such services. As an applicant, you are still responsible for the requirements of this letter, even though you have hired a consultant to assist you.

This authorization to initiate consultation under the Section 106 process does **not** constitute Rural Development approval of your request for financial assistance. All costs incurred by the applicant in compliance with the Section 106 process are incurred at the applicant's risk.

Note: Do **not** take any actions which might have an adverse effect on historic property or cultural resources until the Section 106 review process is completed. Section 110(k) of the National Historic Preservation Act **may prohibit** federal agencies from providing federal financial assistance to any applicant who "... with intent to avoid the requirements of Section 106, has intentionally significantly adversely affected a historic property..."

Please contact your Rural Development representative Tasha Deardorff at (907) 271-2424 ext 118 or by email at Tasha.Deardorff@ak.usda.gov, should you have any questions.

* The area of potential effects (APE) is defined by 36 CFR Part 800, Section 800.16(d) as follows: "Area of potential effects means the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

Project Description

The Matanuska-Susitna Borough (MSB) is proposing to upgrade the Talkeetna Wastewater Treatment Facility (WWTF) in Talkeetna, Alaska. The project is located within Section 19 of Township 26 North, Range 4 West of the Seward Meridian, and within U.S. Geological Survey Quadrangle Talkeetna B-1 (Figure 1 & Figure 2).

The existing WWTF is not in compliance with its State-administered wastewater discharge permit. Correspondence from the Alaska Department of Environmental Conservation (ADEC) includes a listing of permit compliance excursions, including high effluent fecal coliform counts, low effluent dissolved oxygen concentrations, inadequate biological oxygen demand (BOD₅) and total suspended solids (TSS) removals, and/or excessively high effluent BOD₅ and TSS concentrations. The MSB is seeking to upgrade the WWTF to bring it into regulatory compliance now and into the future.

Currently, two alternatives are being considered in association with the proposed project. Both alternatives would reconfigure the lagoon cells within the existing facility and construct additional lagoon cell(s). Alternatives may involve construction of chlorination/dechlorination facilities or ultraviolet disinfection facilities; addition of lagoon aeration equipment; construction of new lagoon cells; and/or modifications to existing lagoon cells.

For the purpose of evaluation of impacts to historical and archeological properties we have used the alternative with the larger proposed footprint for our identification efforts. A conceptual sketch of the alternative with the larger configuration and ground disturbance footprint is shown in Figure 3. The project would increase the existing 10-acre facility to approximately 20 acres, including lagoon cells, access driveways, and embankment slopes. All improvements associated with the facility upgrade would be located entirely within MSB-owned property.

Description of Project Site

The project site is located on a 40-acre property currently owned by the MSB and occupied solely by the existing WWTF. The proposed area of expansion is undeveloped, forested, and relatively flat. The majority of the site is uplands, with the exception of an inactive wetlands slough of the Talkeetna River running through the center of the property, and an active slough in the northwest corner of the property into which the WWTF currently discharges effluent. The property is within a FEMA-designated special flood hazard area; however, there are no other special land use or zoning restrictions.

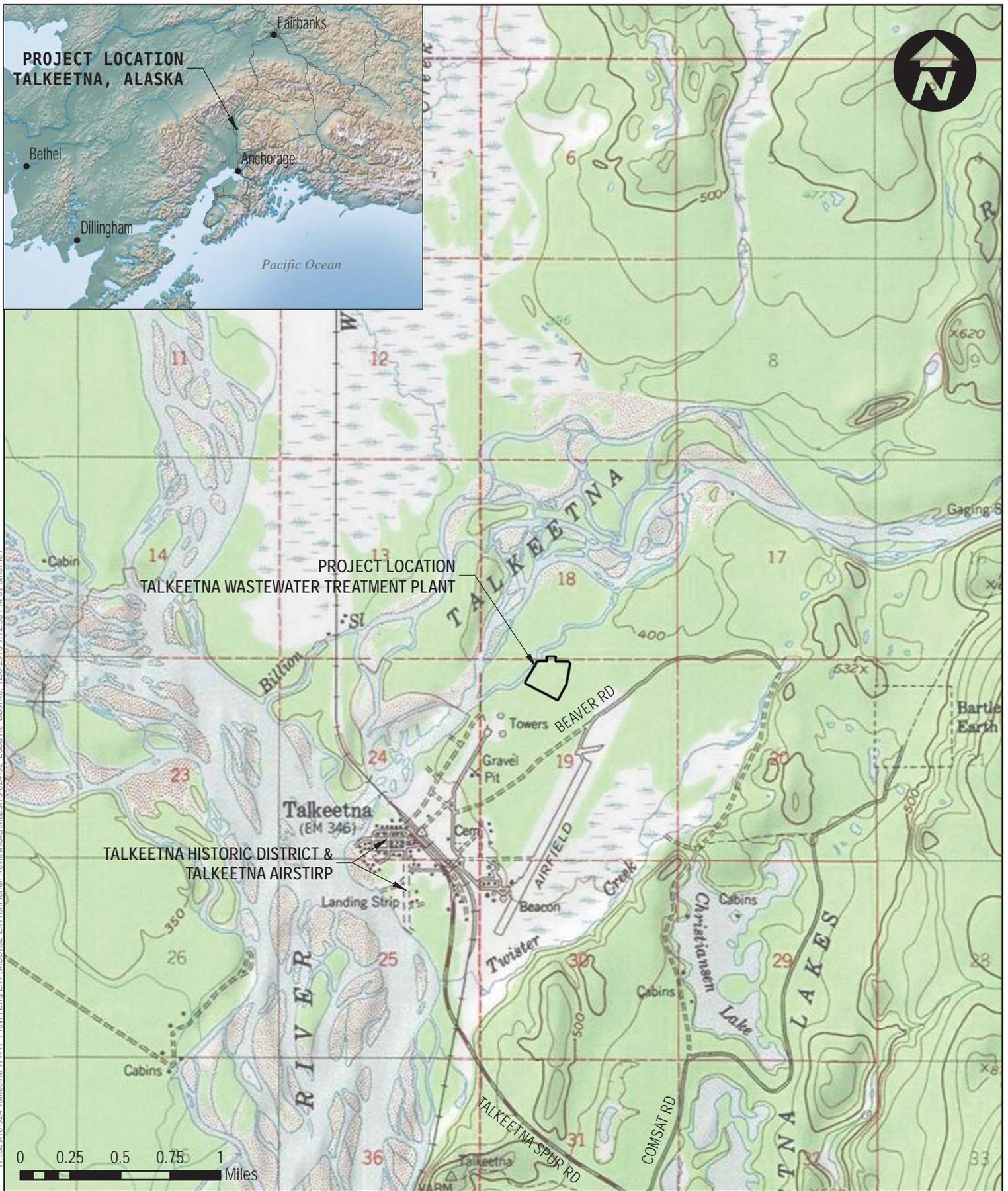


Figure 1: Lagoon cell with undeveloped, forested portion of MSB-owned land behind.

Federal, State, and Local Agency Involvement

The proposed project is being funded through the USDA Rural Utilities Program. Federal, State, and local permits that may be required to construct the proposed project are shown in the table below:

Regulatory Action	Regulatory Agency	Project Activity
Federal Agency		
Environmental Document	USDA	Project requesting federal funding from USDA
Wetlands Permit	USACE	Discharge of fill or dredged material into waters of the U.S.
State of Alaska Agency		
Water Quality Certification	ADEC	Storm water discharge review of USACE wetlands permit
Section 106 Review	ADNR State Historic Preservation Officer	Work potentially affecting significant cultural, historic, pre-historic, or archaeological resources.
Construction General Permit	ADEC	Storm water discharges to waters of the U.S. from construction site.
Local Agency		
Floodplain Development Permit	Matanuska-Susitna Borough	Work within FEMA-mapped flood areas.



Section 19, Township 26N, Range 4W, Seward Meridian
 USGS: Talkeetna B-1
 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

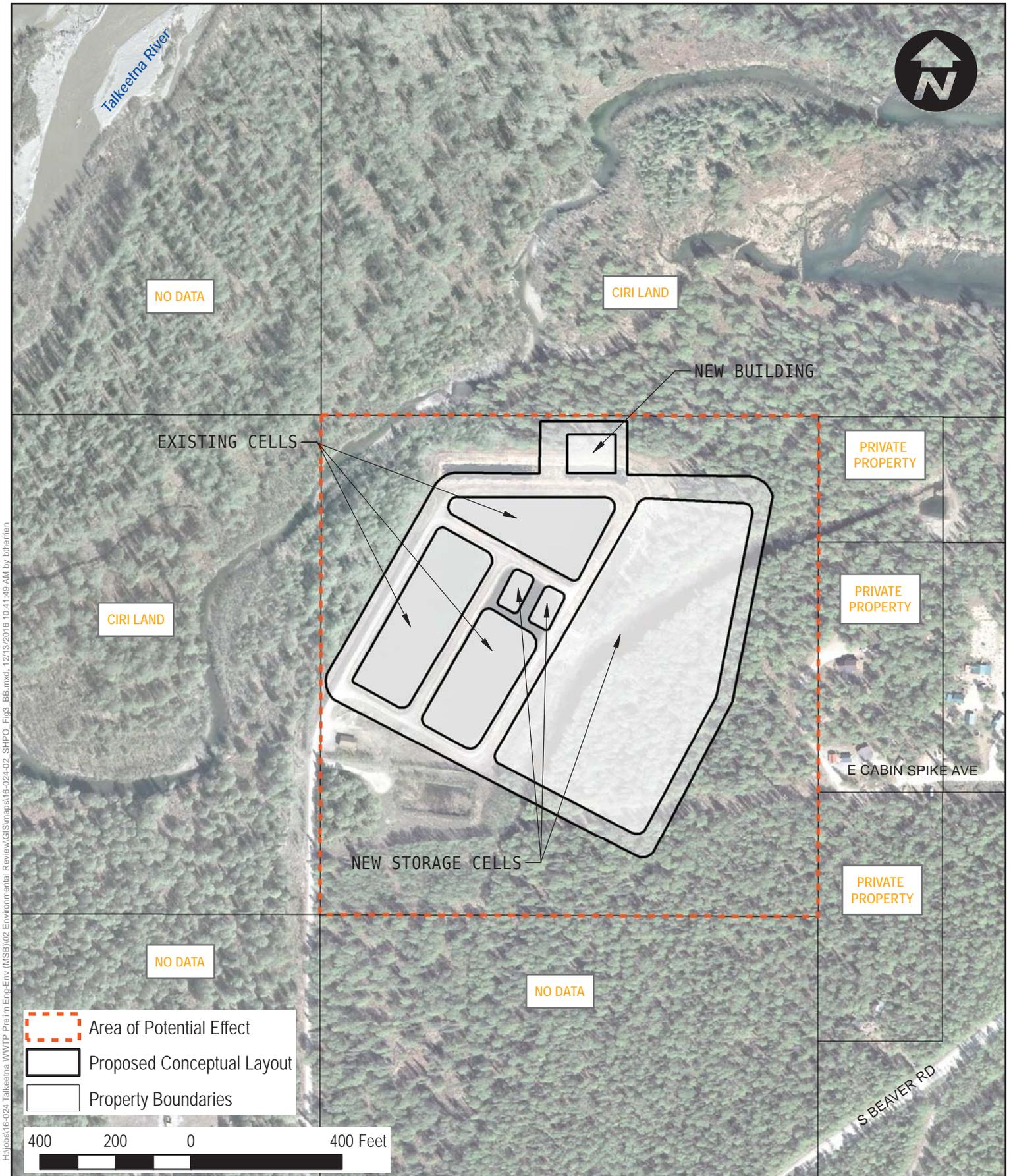
Figure 1
 Location and Vicinity Map



Section 19, Township 26N, Range 4W, Seward Meridian
 USGS: Talkeetna B-1
 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

Figure 2
Existing Talkeetna Wastewater Treatment Facility



Section 19, Township 26N, Range 4W, Seward Meridian
 USGS: Talkeetna B-1
 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

Figure 3
Area of Potential Effect &
Proposed Development

December 20, 2016

Jason Brune
 Senior Director of Land and Resources
 Cook Inlet Region, Incorporated
 P.O. Box 93330
 Anchorage, Alaska 99509

RE: Section 106 Review Process
 Matanuska-Susitna Borough - Talkeetna Wastewater Treatment Facility

Dear Mr. Brune:

CIVIL
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ENGINEERING

TRANSPORTATION
ENGINEERING

ENVIRONMENTAL
SERVICES

PLANNING

SURVEYING
& MAPPING

CONSTRUCTION
ADMINISTRATION

MATERIAL
TESTING

RIGHT-OF-WAY
SERVICES

The Matanuska-Susitna Borough (MSB) has applied to the U.S. Department of Agriculture (USDA) Rural Development for federal financial assistance to upgrade the Waste Water Treatment Facility in Talkeetna, Alaska. HDL Engineering Consultants, LLC (HDL), on behalf of the MSB, has been authorized by the USDA to initiate the consultation process required under Section 106 of the National Historic Preservation Act (NHPA) (see attached authorization). Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties.

For the purposes of the National Historic Preservation Act, we are initiating formal consultation with you to assist us in identifying places that may be of traditional religious or cultural importance to your tribal organization. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We would be pleased to discuss with you any confidential areas of concern you may identify and discuss project details.

Proposed Project

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Area of Potential Effect

The Area of Potential Effect (APE) for the project consists of the property parcel boundaries (Figure 3).

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Anchorage	3335 Arctic Boulevard, Suite 100, Anchorage 99503	907.564.2120
Mat-Su	202 West Elmwood Avenue, Palmer 99645	907.746.5230
Kenai Peninsula	10735 Spur Highway, Suite 1B, Kenai 99611	907.283.2051

- Three privately owned residential lots located east of the APE;
- Two parcels of undeveloped land owned by Cook Inlet Regional Incorporation (CIRI) located to the north and west of the APE; and
- Three parcels of undeveloped land that according to the MSB tax parcel viewer does not contain any ownership or building data located south, southwest, and northwest of the APE.

According to the MSB tax parcel viewer the surrounding properties are predominantly undeveloped, with the exception of a single family residence with several buildings on the adjacent property to the east. One of the buildings located on this property was built in 1970. Because the building is approaching 50 years old, it has the potential to be considered a historic property. However, it has not been evaluated to determine if it meets the criteria to be classified as a historic property. The current design concept places the eastern edge of the new lagoon cell approximately 200 feet from the eastern property boundary and 250 feet from the nearest residential building. Therefore, no historic survey is planned for the project.

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Consultation with other interested parties will include; Chickaloon Village Traditional Council; Knik Tribal Council; and MSB Planning Department.

If you wish to provide comments related to this project or have any questions please contact me by mail at 3335 Arctic Boulevard, Anchorage, Alaska, 99503, by phone at (907) 564-2159, or by email at BTherrien@HDLAlaska.com; or you may contact USDA Rural Development directly by calling Tasha Deardorff by phone at (907) 271-2424, Ext 118, or by email at Tasha.Deardorff@ak.usda.gov.

Sincerely,
HDL Engineering Consultants, LLC



Brooke Therrien
Environmental Specialist

Attachments:

- Section 106 Consultation Authorization
- Project Description
- Figure 1: Location and Vicinity Map
- Figure 2: Existing Talkeetna Wastewater Treatment Facility
- Figure 3: Area of Potential Effect and Proposed Development



Rural Development

510 L Street,
Suite 410
Anchorage, AK
99501

Voice 907.271-2424

Section 106 Consultation Authorization and Instructions to Applicant

DATE: 12/13/2016

TO: Matanuska-Susitna Borough - Talkeetna Wastewater Treatment Facility
Palmer, Alaska

HDL Engineering Consultants, LLC
Anchorage, AK

FROM: USDA Rural Development
510 L Street, Suite 410
Anchorage, AK

SUBJECT: Initiating Consultations under the Section 106 Process

In order for Rural Development to make a decision on the Talkeetna application, an environmental review must first be completed. Among other items, this environmental review includes an analysis of the potential for your proposed project to impact sites that are listed or eligible for listing on the National Register of Historic Places. This analysis is required by Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations located at 36 CFR Part 800. NHPA requires Rural Development to work closely with the State Historic Preservation Office (SHPO), Tribes, and other consulting parties to take into account the effects of your project on historic properties and to attempt to find ways to avoid, minimize, or mitigate adverse effects, to the extent practicable.

Receipt of this letter from Rural Development authorizes you to initiate consultation under the Section 106 process. Please proceed as follows:

1. Review the attached letter (Attachment 1) and the required supporting documentation (Attachment 2).
2. Your Rural Development representative will:
 - Answer any questions you have about completing the letter and the supporting documentation;
 - Assist you in a preliminary description of the area of potential effects* (APE);
 - Assist you in developing a preliminary list of the consulting parties.

USDA is an equal opportunity provider, employer, and lender.

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form (PDF), found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Please complete the following:

1. Send the completed letter (Attachment 1) and the supporting documentation (contained in Attachment 2) to each of the consulting parties on the list (retain a dated copy of each letter for your records).
2. Include a copy of this Authorization/Instructions document with your letter to the SHPO and/or THPO.
3. Allow 30 days for receipt of comments. Incorporate any comments received into the environmental information/report (depending on Rural Development program) being prepared as part of your application to Rural Development, and attach copies of each letter you sent out and comments received to the environmental information/report.

The initiation of consultation is the first step in the Section 106 process. This authorization permits you, as an applicant (or, by proxy, the applicant's consultant), to initiate this consultation process and to assist Rural Development in collecting and evaluating information to facilitate timely compliance with Section 106 requirements. Rural Development remains legally responsible for making all formal determinations and findings under the Section 106 process.

Please be aware that some proposals require the services of a professional consultant. For example, an archeological survey may be needed before the Section 106 process can be concluded. Your Rural Development representative can provide you further guidance, if there is a need for such services. As an applicant, you are still responsible for the requirements of this letter, even though you have hired a consultant to assist you.

This authorization to initiate consultation under the Section 106 process does **not** constitute Rural Development approval of your request for financial assistance. All costs incurred by the applicant in compliance with the Section 106 process are incurred at the applicant's risk.

Note: Do **not** take any actions which might have an adverse effect on historic property or cultural resources until the Section 106 review process is completed. Section 110(k) of the National Historic Preservation Act **may prohibit** federal agencies from providing federal financial assistance to any applicant who "... with intent to avoid the requirements of Section 106, has intentionally significantly adversely affected a historic property..."

Please contact your Rural Development representative Tasha Deardorff at (907) 271-2424 ext 118 or by email at Tasha.Deardorff@ak.usda.gov, should you have any questions.

* The area of potential effects (APE) is defined by 36 CFR Part 800, Section 800.16(d) as follows: "Area of potential effects means the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

Project Description

The Matanuska-Susitna Borough (MSB) is proposing to upgrade the Talkeetna Wastewater Treatment Facility (WWTF) in Talkeetna, Alaska. The project is located within Section 19 of Township 26 North, Range 4 West of the Seward Meridian, and within U.S. Geological Survey Quadrangle Talkeetna B-1 (Figure 1 & Figure 2).

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Currently, two alternatives are being considered in association with the proposed project. Both alternatives would reconfigure the lagoon cells within the existing facility and construct additional lagoon cell(s). Alternatives may involve construction of chlorination/dechlorination facilities or ultraviolet disinfection facilities; addition of lagoon aeration equipment; construction of new lagoon cells; and/or modifications to existing lagoon cells.

For the purpose of evaluation of impacts to historical and archeological properties we have used the alternative with the larger proposed footprint for our identification efforts. A conceptual sketch of the alternative with the larger configuration and ground disturbance footprint is shown in Figure 3. The project would increase the existing 10-acre facility to approximately 20 acres, including lagoon cells, access driveways, and embankment slopes. All improvements associated with the facility upgrade would be located entirely within MSB-owned property.

Description of Project Site

The project site is located on a 40-acre property currently owned by the MSB and occupied solely by the existing WWTF. The proposed area of expansion is undeveloped, forested, and relatively flat. The majority of the site is uplands, with the exception of an inactive wetlands slough of the Talkeetna River running through the center of the property, and an active slough in the northwest corner of the property into which the WWTF currently discharges effluent. The property is within a FEMA-designated special flood hazard area; however, there are no other special land use or zoning restrictions.

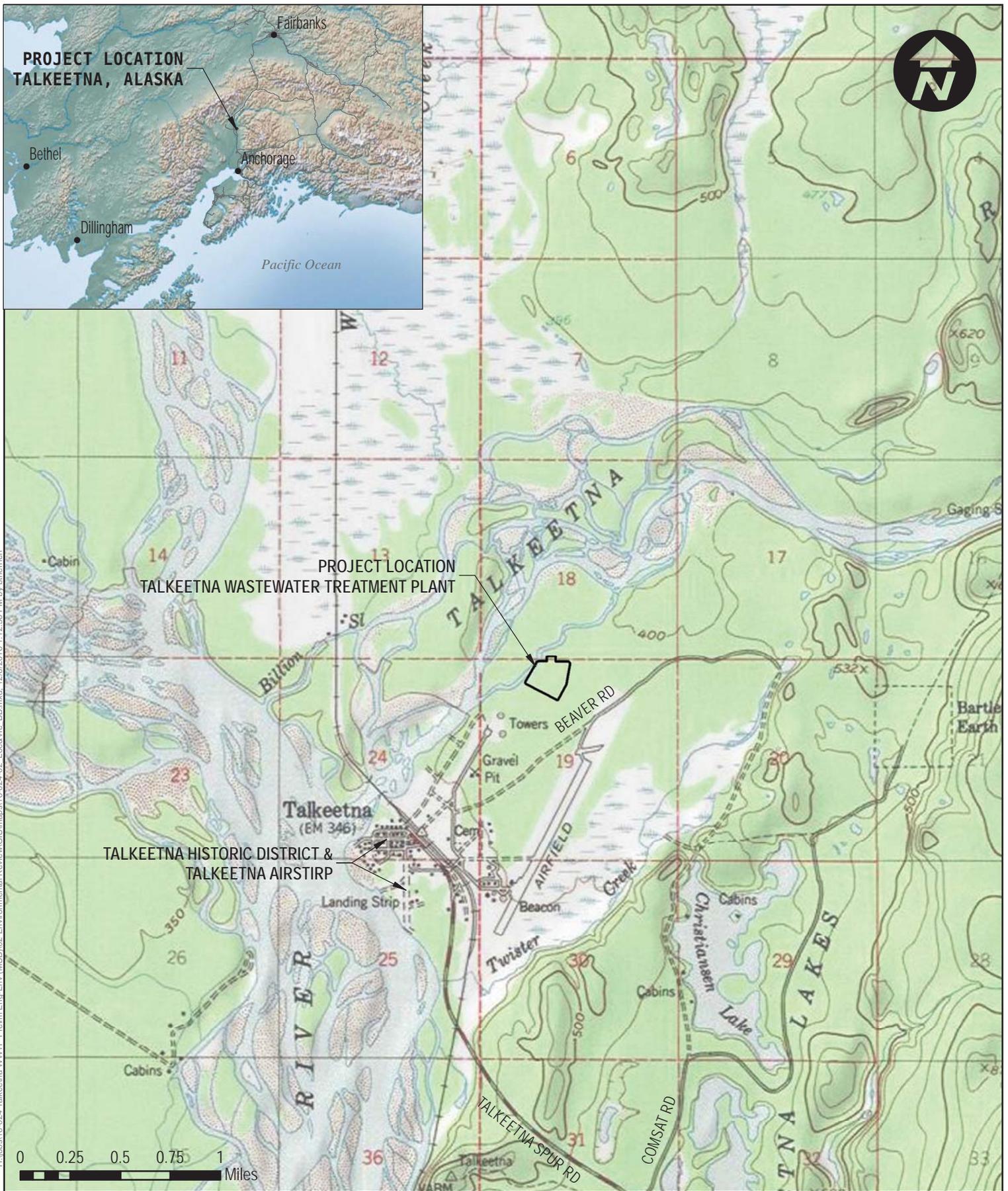


Figure 1: Lagoon cell with undeveloped, forested portion of MSB-owned land behind.

Federal, State, and Local Agency Involvement

The proposed project is being funded through the USDA Rural Utilities Program. Federal, State, and local permits that may be required to construct the proposed project are shown in the table below:

Regulatory Action	Regulatory Agency	Project Activity
Federal Agency		
Environmental Document	USDA	Project requesting federal funding from USDA
Wetlands Permit	USACE	Discharge of fill or dredged material into waters of the U.S.
State of Alaska Agency		
Water Quality Certification	ADEC	Storm water discharge review of USACE wetlands permit
Section 106 Review	ADNR State Historic Preservation Officer	Work potentially affecting significant cultural, historic, pre-historic, or archaeological resources.
Construction General Permit	ADEC	Storm water discharges to waters of the U.S. from construction site.
Local Agency		
Floodplain Development Permit	Matanuska-Susitna Borough	Work within FEMA-mapped flood areas.



Section 19, Township 26N, Range 4W, Seward Meridian
 USGS: Talkeetna B-1
 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

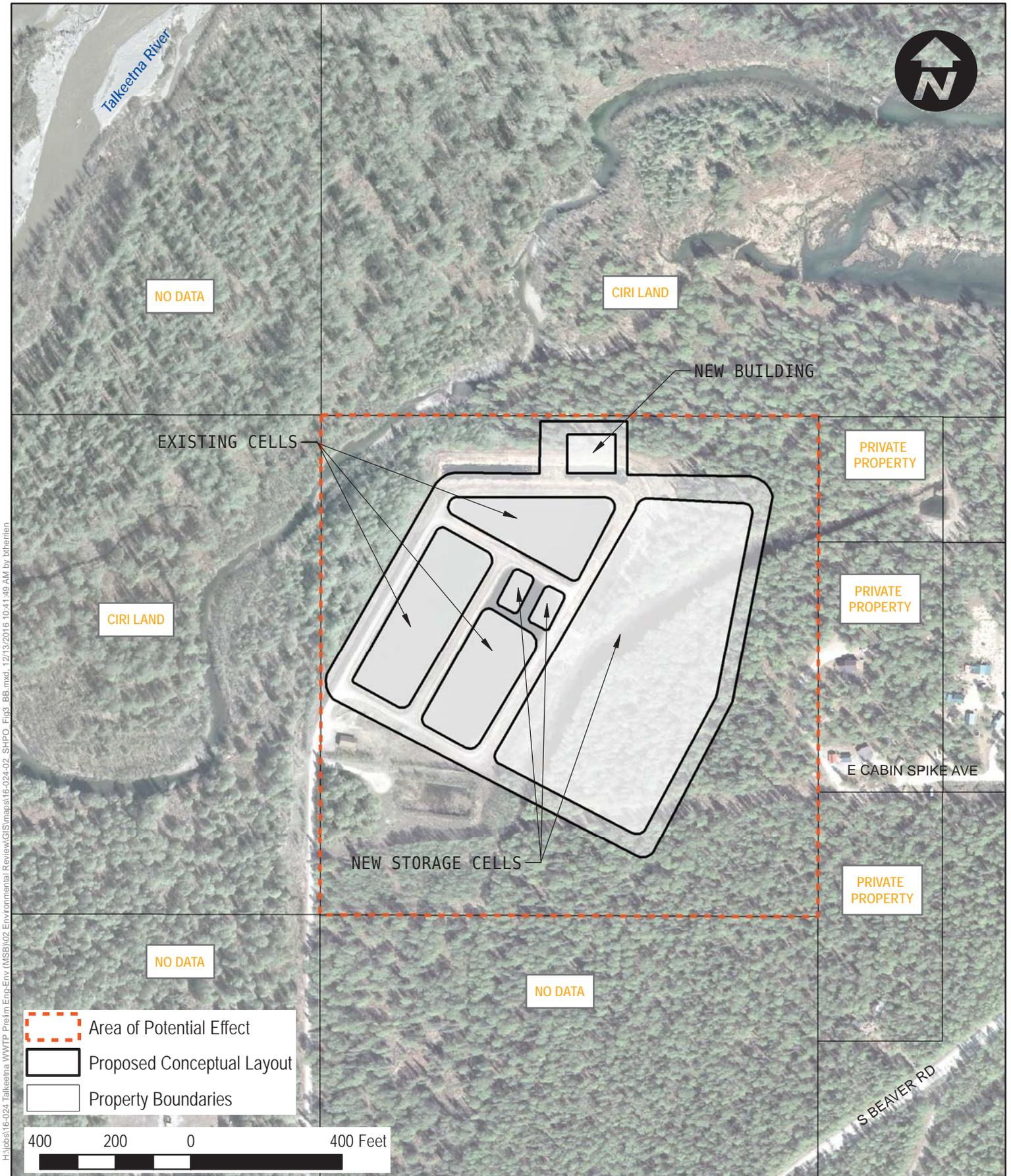
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 USGS: Talkeetna B-1
 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

Figure 2
Existing Talkeetna Wastewater Treatment Facility



Section 19, Township 26N, Range 4W, Seward Meridian
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 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

Figure 3
Area of Potential Effect &
Proposed Development

December 20, 2016

Eileen Probasco
 Planning and Land Use Director
 MSB Planning Department
 350 E. Dahlia Avenue
 Palmer, Alaska 99645

RE: Section 106 Review Process
 Matanuska-Susitna Borough - Talkeetna Wastewater Treatment Facility

Dear Ms. Probasco:

CIVIL
ENGINEERING

GEOTECHNICAL
ENGINEERING

TRANSPORTATION
ENGINEERING

ENVIRONMENTAL
SERVICES

PLANNING

SURVEYING
& MAPPING

CONSTRUCTION
ADMINISTRATION

MATERIAL
TESTING

RIGHT-OF-WAY
SERVICES

The Matanuska-Susitna Borough (MSB) has applied to the U.S. Department of Agriculture (USDA) Rural Development for federal financial assistance to upgrade the Waste Water Treatment Facility in Talkeetna, Alaska. HDL Engineering Consultants, LLC (HDL), on behalf of the MSB, has been authorized by the USDA to initiate the consultation process required under Section 106 of the National Historic Preservation Act (NHPA) (see attached authorization). Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties.

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Brooke Therrien
Environmental Specialist

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Rural Development

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Anchorage, AK
99501

Voice 907.271-2424

Section 106 Consultation Authorization and Instructions to Applicant

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Palmer, Alaska

HDL Engineering Consultants, LLC
Anchorage, AK

FROM: USDA Rural Development
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Anchorage, AK

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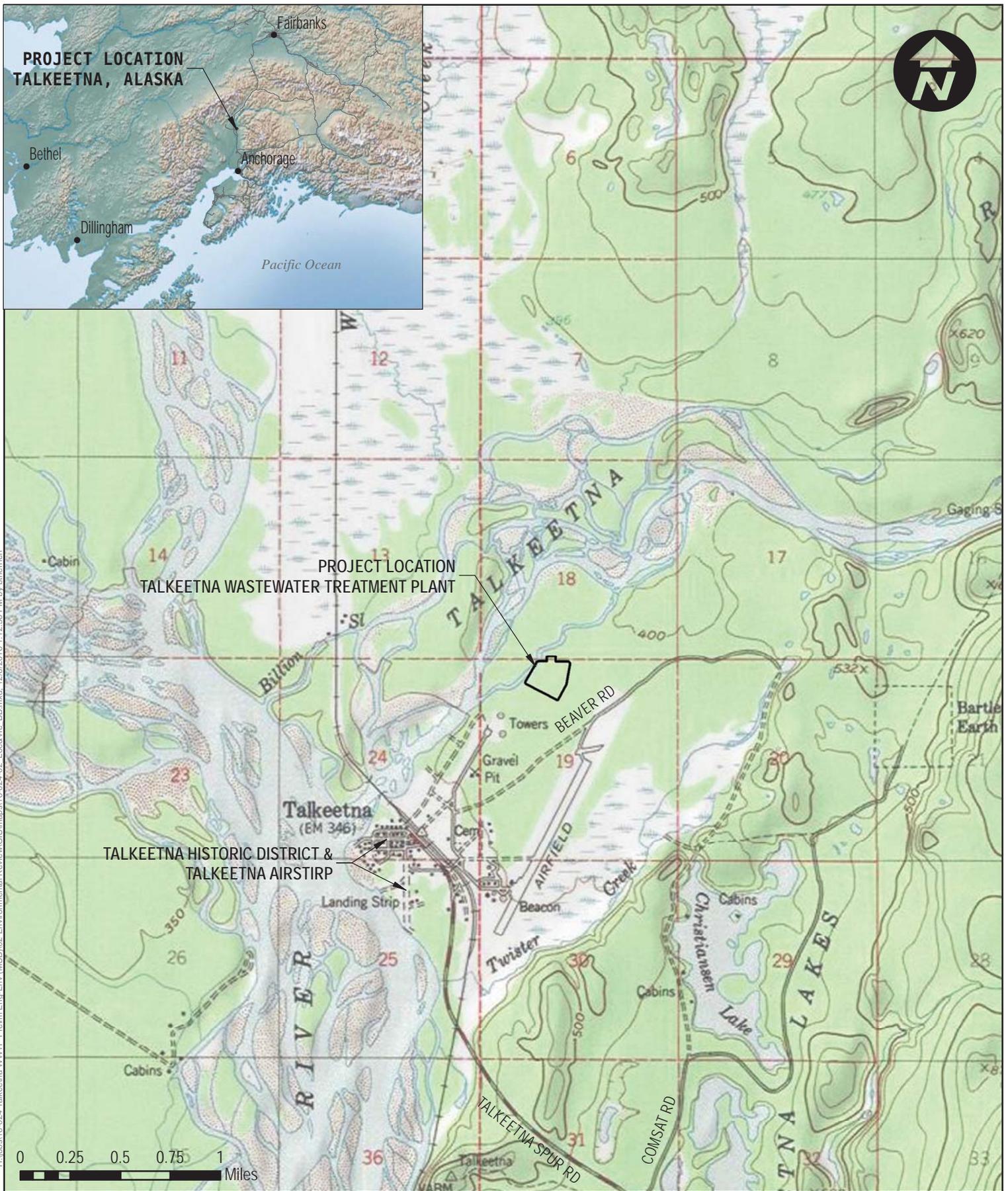


Figure 1: Lagoon cell with undeveloped, forested portion of MSB-owned land behind.

Federal, State, and Local Agency Involvement

The proposed project is being funded through the USDA Rural Utilities Program. Federal, State, and local permits that may be required to construct the proposed project are shown in the table below:

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Section 19, Township 26N, Range 4W, Seward Meridian
 USGS: Talkeetna B-1
 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

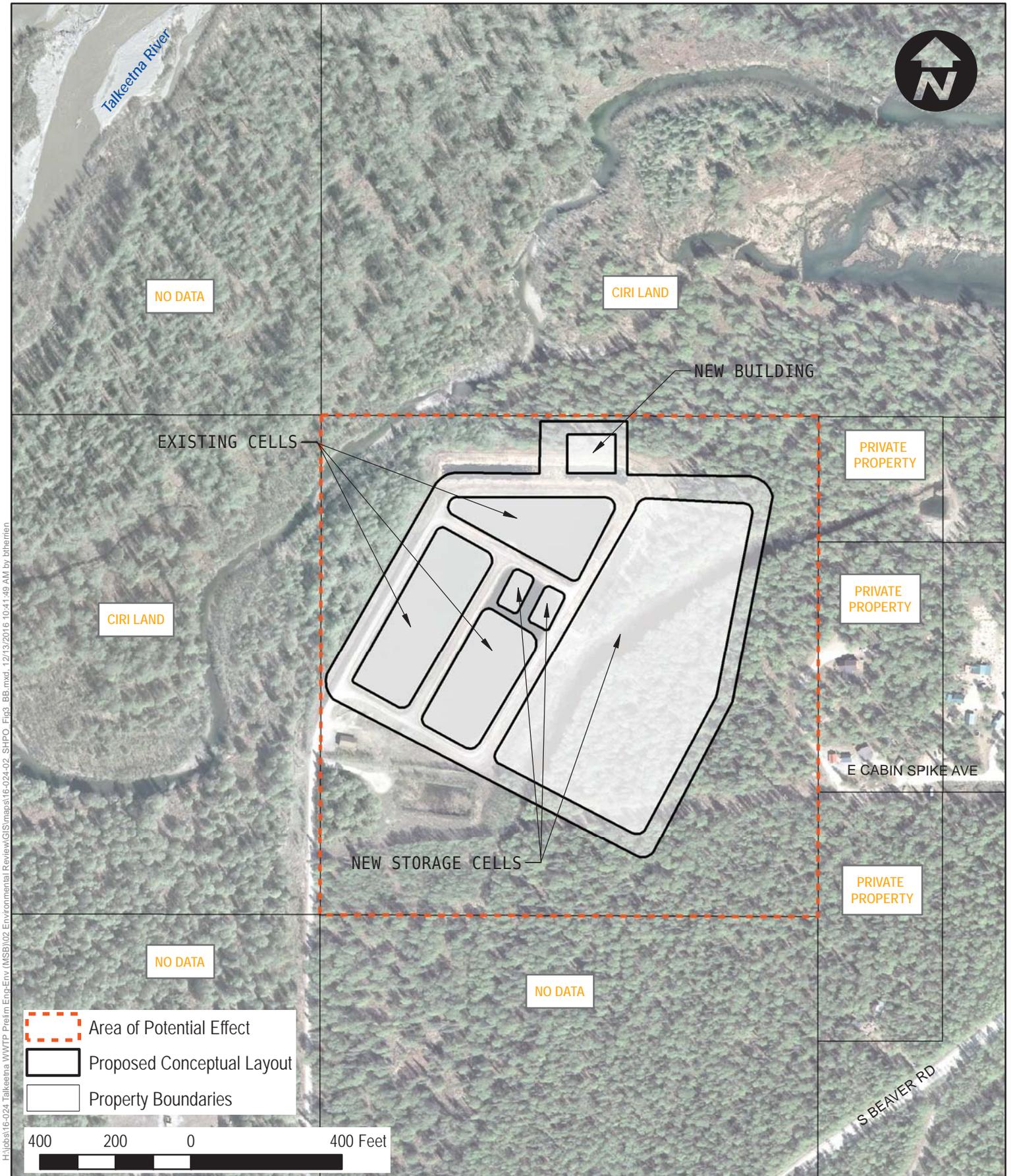
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Section 19, Township 26N, Range 4W, Seward Meridian
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 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

Figure 2
Existing Talkeetna Wastewater Treatment Facility



Section 19, Township 26N, Range 4W, Seward Meridian
 USGS: Talkeetna B-1
 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

Figure 3
Area of Potential Effect &
Proposed Development

December 20, 2016

Theo Garcia
 Environmental Coordinator
 Knik Tribal Council
 P.O. Box 871565
 Wasilla, Alaska 99687

RE: Section 106 Review Process
 Matanuska-Susitna Borough - Talkeetna Wastewater Treatment Facility

Dear Mr. Garcia:

CIVIL
ENGINEERING

GEOTECHNICAL
ENGINEERING

TRANSPORTATION
ENGINEERING

ENVIRONMENTAL
SERVICES

PLANNING

SURVEYING
& MAPPING

CONSTRUCTION
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RIGHT-OF-WAY
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Rural Development

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Anchorage, AK
99501

Voice 907.271-2424

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Palmer, Alaska

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Anchorage, AK

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Anchorage, AK

SUBJECT: Initiating Consultations under the Section 106 Process

In order for Rural Development to make a decision on the Talkeetna application, an environmental review must first be completed. Among other items, this environmental review includes an analysis of the potential for your proposed project to impact sites that are listed or eligible for listing on the National Register of Historic Places. This analysis is required by Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations located at 36 CFR Part 800. NHPA requires Rural Development to work closely with the State Historic Preservation Office (SHPO), Tribes, and other consulting parties to take into account the effects of your project on historic properties and to attempt to find ways to avoid, minimize, or mitigate adverse effects, to the extent practicable.

Receipt of this letter from Rural Development authorizes you to initiate consultation under the Section 106 process. Please proceed as follows:

1. Review the attached letter (Attachment 1) and the required supporting documentation (Attachment 2).
2. Your Rural Development representative will:
 - Answer any questions you have about completing the letter and the supporting documentation;
 - Assist you in a preliminary description of the area of potential effects* (APE);
 - Assist you in developing a preliminary list of the consulting parties.

USDA is an equal opportunity provider, employer, and lender.

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form (PDF), found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Please complete the following:

1. Send the completed letter (Attachment 1) and the supporting documentation (contained in Attachment 2) to each of the consulting parties on the list (retain a dated copy of each letter for your records).
2. Include a copy of this Authorization/Instructions document with your letter to the SHPO and/or THPO.
3. Allow 30 days for receipt of comments. Incorporate any comments received into the environmental information/report (depending on Rural Development program) being prepared as part of your application to Rural Development, and attach copies of each letter you sent out and comments received to the environmental information/report.

The initiation of consultation is the first step in the Section 106 process. This authorization permits you, as an applicant (or, by proxy, the applicant's consultant), to initiate this consultation process and to assist Rural Development in collecting and evaluating information to facilitate timely compliance with Section 106 requirements. Rural Development remains legally responsible for making all formal determinations and findings under the Section 106 process.

Please be aware that some proposals require the services of a professional consultant. For example, an archeological survey may be needed before the Section 106 process can be concluded. Your Rural Development representative can provide you further guidance, if there is a need for such services. As an applicant, you are still responsible for the requirements of this letter, even though you have hired a consultant to assist you.

This authorization to initiate consultation under the Section 106 process does **not** constitute Rural Development approval of your request for financial assistance. All costs incurred by the applicant in compliance with the Section 106 process are incurred at the applicant's risk.

Note: Do **not** take any actions which might have an adverse effect on historic property or cultural resources until the Section 106 review process is completed. Section 110(k) of the National Historic Preservation Act **may prohibit** federal agencies from providing federal financial assistance to any applicant who "... with intent to avoid the requirements of Section 106, has intentionally significantly adversely affected a historic property..."

Please contact your Rural Development representative Tasha Deardorff at (907) 271-2424 ext 118 or by email at Tasha.Deardorff@ak.usda.gov, should you have any questions.

* The area of potential effects (APE) is defined by 36 CFR Part 800, Section 800.16(d) as follows: "Area of potential effects means the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

Project Description

The Matanuska-Susitna Borough (MSB) is proposing to upgrade the Talkeetna Wastewater Treatment Facility (WWTF) in Talkeetna, Alaska. The project is located within Section 19 of Township 26 North, Range 4 West of the Seward Meridian, and within U.S. Geological Survey Quadrangle Talkeetna B-1 (Figure 1 & Figure 2).

The existing WWTF is not in compliance with its State-administered wastewater discharge permit. Correspondence from the Alaska Department of Environmental Conservation (ADEC) includes a listing of permit compliance excursions, including high effluent fecal coliform counts, low effluent dissolved oxygen concentrations, inadequate biological oxygen demand (BOD₅) and total suspended solids (TSS) removals, and/or excessively high effluent BOD₅ and TSS concentrations. The MSB is seeking to upgrade the WWTF to bring it into regulatory compliance now and into the future.

Currently, two alternatives are being considered in association with the proposed project. Both alternatives would reconfigure the lagoon cells within the existing facility and construct additional lagoon cell(s). Alternatives may involve construction of chlorination/dechlorination facilities or ultraviolet disinfection facilities; addition of lagoon aeration equipment; construction of new lagoon cells; and/or modifications to existing lagoon cells.

For the purpose of evaluation of impacts to historical and archeological properties we have used the alternative with the larger proposed footprint for our identification efforts. A conceptual sketch of the alternative with the larger configuration and ground disturbance footprint is shown in Figure 3. The project would increase the existing 10-acre facility to approximately 20 acres, including lagoon cells, access driveways, and embankment slopes. All improvements associated with the facility upgrade would be located entirely within MSB-owned property.

Description of Project Site

The project site is located on a 40-acre property currently owned by the MSB and occupied solely by the existing WWTF. The proposed area of expansion is undeveloped, forested, and relatively flat. The majority of the site is uplands, with the exception of an inactive wetlands slough of the Talkeetna River running through the center of the property, and an active slough in the northwest corner of the property into which the WWTF currently discharges effluent. The property is within a FEMA-designated special flood hazard area; however, there are no other special land use or zoning restrictions.

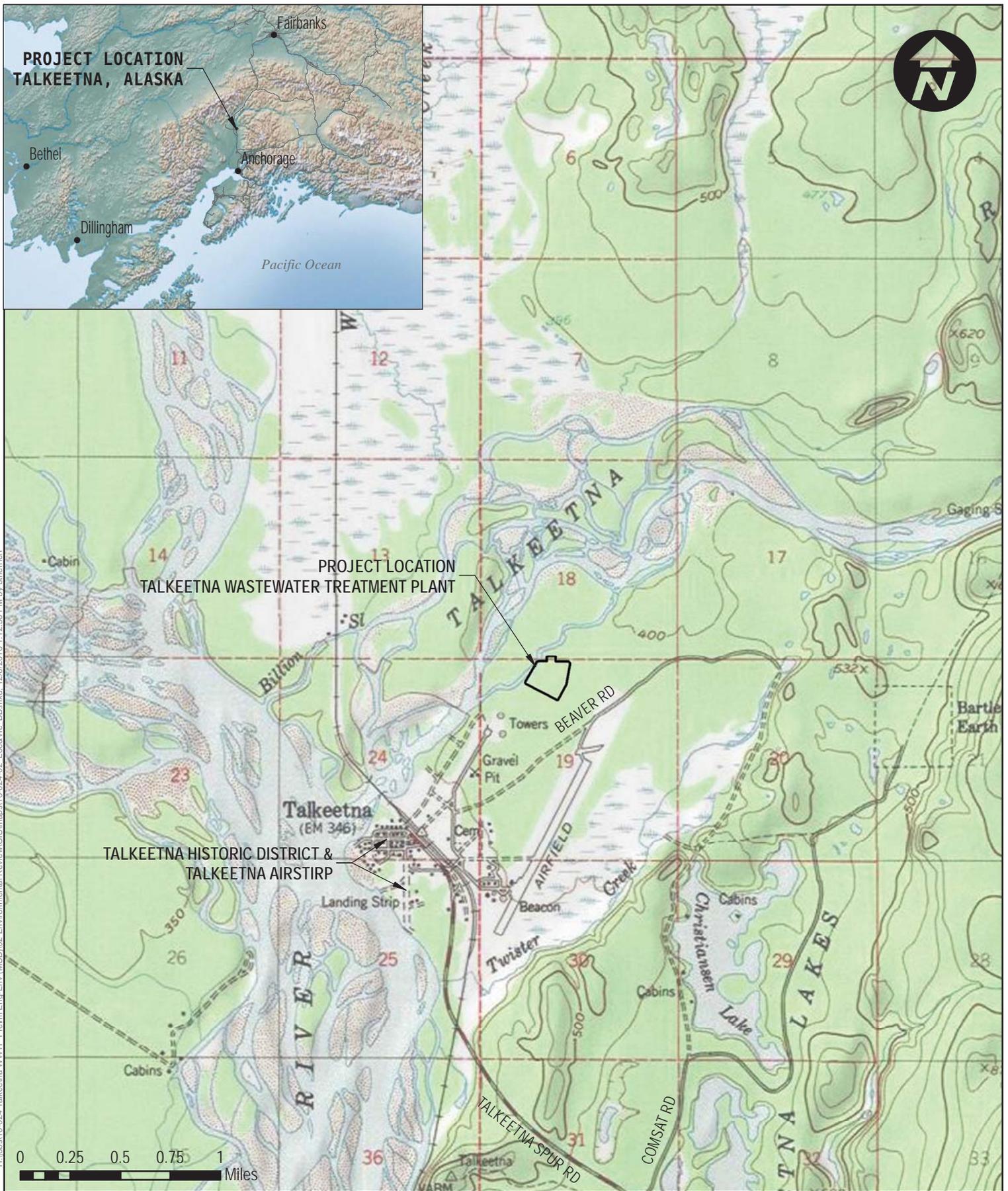


Figure 1: Lagoon cell with undeveloped, forested portion of MSB-owned land behind.

Federal, State, and Local Agency Involvement

The proposed project is being funded through the USDA Rural Utilities Program. Federal, State, and local permits that may be required to construct the proposed project are shown in the table below:

Regulatory Action	Regulatory Agency	Project Activity
Federal Agency		
Environmental Document	USDA	Project requesting federal funding from USDA
Wetlands Permit	USACE	Discharge of fill or dredged material into waters of the U.S.
State of Alaska Agency		
Water Quality Certification	ADEC	Storm water discharge review of USACE wetlands permit
Section 106 Review	ADNR State Historic Preservation Officer	Work potentially affecting significant cultural, historic, pre-historic, or archaeological resources.
Construction General Permit	ADEC	Storm water discharges to waters of the U.S. from construction site.
Local Agency		
Floodplain Development Permit	Matanuska-Susitna Borough	Work within FEMA-mapped flood areas.



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Section 19, Township 26N, Range 4W, Seward Meridian
 USGS: Talkeetna B-1
 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

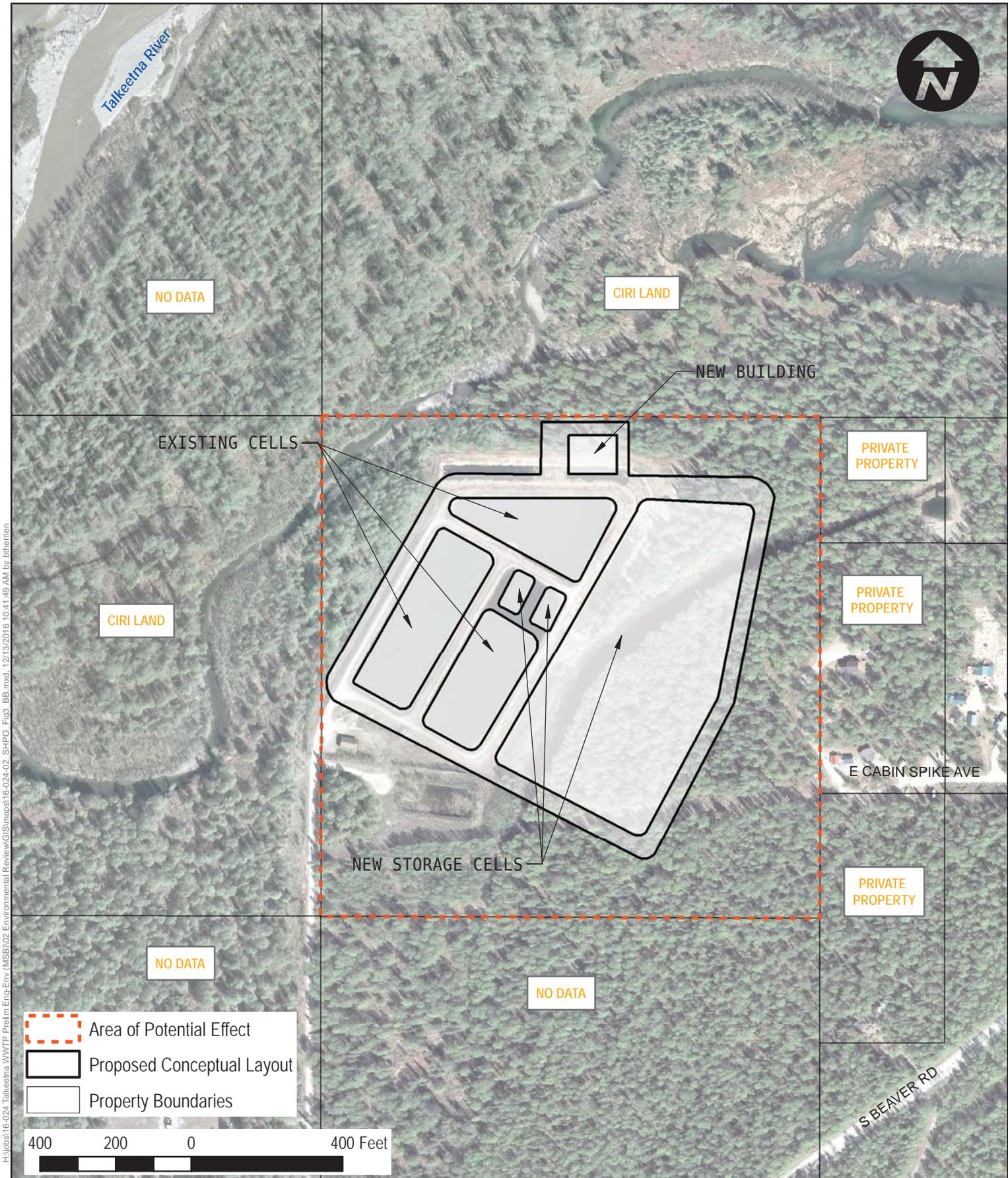
Figure 1
 Location and Vicinity Map



Section 19, Township 26N, Range 4W, Seward Meridian
 USGS: Talkeetna B-1
 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

Figure 2
Existing Talkeetna Wastewater Treatment Facility



Section 19, Township 26N, Range 4W, Seward Meridian
 USGS: Talkeetna B-1
 Talkeetna Alaska

Matanuska-Susitna Borough
 Talkeetna Waste Water Treatment Facility
 December 2016

Figure 3
Area of Potential Effect &
Proposed Development

December 20, 2016

Jessica Winnestaffer
 Department Director
 Chickaloon Village Traditional Council
 P.O. Box 1105
 Chickaloon, Alaska 99674

RE: Section 106 Review Process
 Matanuska-Susitna Borough - Talkeetna Wastewater Treatment Facility

Dear Ms. Winnestaffer:

The Matanuska-Susitna Borough (MSB) has applied to the U.S. Department of Agriculture (USDA) Rural Development for federal financial assistance to upgrade the Waste Water Treatment Facility in Talkeetna, Alaska. HDL Engineering Consultants, LLC (HDL), on behalf of the MSB, has been authorized by the USDA to initiate the consultation process required under Section 106 of the National Historic Preservation Act (NHPA) (see attached authorization). Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties.

For the purposes of the National Historic Preservation Act, we are initiating formal consultation with you to assist us in identifying places that may be of traditional religious or cultural importance to your tribal organization. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We would be pleased to discuss with you any confidential areas of concern you may identify and discuss project details.

Proposed Project

The Matanuska-Susitna Borough (MSB) is proposing to upgrade the Talkeetna Wastewater Treatment Facility (WWTF) in Talkeetna, Alaska. The existing WWTF is not in compliance with its State-administered wastewater discharge permit (see attached project description for further information). The project is located within Section 19 of Township 26 North, Range 4 West of the Seward Meridian, and within U.S. Geological Survey Quadrangle Talkeetna B-1 (Figures 1 & 2).

Area of Potential Effect

The Area of Potential Effect (APE) for the project consists of the property parcel boundaries (Figure 3).

Identification Efforts

To date, no project specific cultural or historic resource field surveys or other identification efforts have taken place. A review of the MSB tax parcel viewer identified eight properties adjacent to the APE which includes;

Anchorage	3335 Arctic Boulevard, Suite 100, Anchorage 99503	907.564.2120
Mat-Su	202 West Elmwood Avenue, Palmer 99645	907.746.5230
Kenai Peninsula	10735 Spur Highway, Suite 1B, Kenai 99611	907.283.2051

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SERVICES

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& MAPPING

CONSTRUCTION
ADMINISTRATION

MATERIAL
TESTING

RIGHT-OF-WAY
SERVICES

- Three privately owned residential lots located east of the APE;
- Two parcels of undeveloped land owned by Cook Inlet Regional Incorporation (CIRI) located to the north and west of the APE; and
- Three parcels of undeveloped land that according to the MSB tax parcel viewer does not contain any ownership or building data located south, southwest, and northwest of the APE.

According to the MSB tax parcel viewer the surrounding properties are predominantly undeveloped, with the exception of a single family residence with several buildings on the adjacent property to the east. One of the buildings located on this property was built in 1970. Because the building is approaching 50 years old, it has the potential to be considered a historic property. However, it has not been evaluated to determine if it meets the criteria to be classified as a historic property. The current design concept places the eastern edge of the new lagoon cell approximately 200 feet from the eastern property boundary and 250 feet from the nearest residential building. Therefore, no historic survey is planned for the project.

The NRHP on-line database, researched on December 5, 2016, indicated that there are two sites within 1-mile of the WWTF that are listed on the NRHP. These include the Talkeetna Airstrip and the Talkeetna Historic District located in/near downtown Talkeetna. Impacts to either site are not anticipated.

Consultation Efforts

Consultation with other interested parties will include; CIRI; Knik Tribal Council; and MSB Planning Department.

If you wish to provide comments related to this project or have any questions please contact me by mail at 3335 Arctic Boulevard, Anchorage, Alaska, 99503, by phone at (907) 564-2159, or by email at BTherrien@HDLAlaska.com; or you may contact USDA Rural Development directly by calling Tasha Deardorff by phone at (907) 271-2424, Ext 118, or by email at Tasha.Deardorff@ak.usda.gov.

Sincerely,
HDL Engineering Consultants, LLC



Brooke Therrien
Environmental Specialist

Attachments:

- Section 106 Consultation Authorization
- Project Description
- Figure 1: Location and Vicinity Map
- Figure 2: Existing Talkeetna Wastewater Treatment Facility
- Figure 3: Area of Potential Effect and Proposed Development





Rural Development

510 L Street,
Suite 410
Anchorage, AK
99501

Voice 907.271-2424

Section 106 Consultation Authorization and Instructions to Applicant

DATE: 12/13/2016

TO: Matanuska-Susitna Borough - Talkeetna Wastewater Treatment Facility
Palmer, Alaska

HDL Engineering Consultants, LLC
Anchorage, AK

FROM: USDA Rural Development
510 L Street, Suite 410
Anchorage, AK

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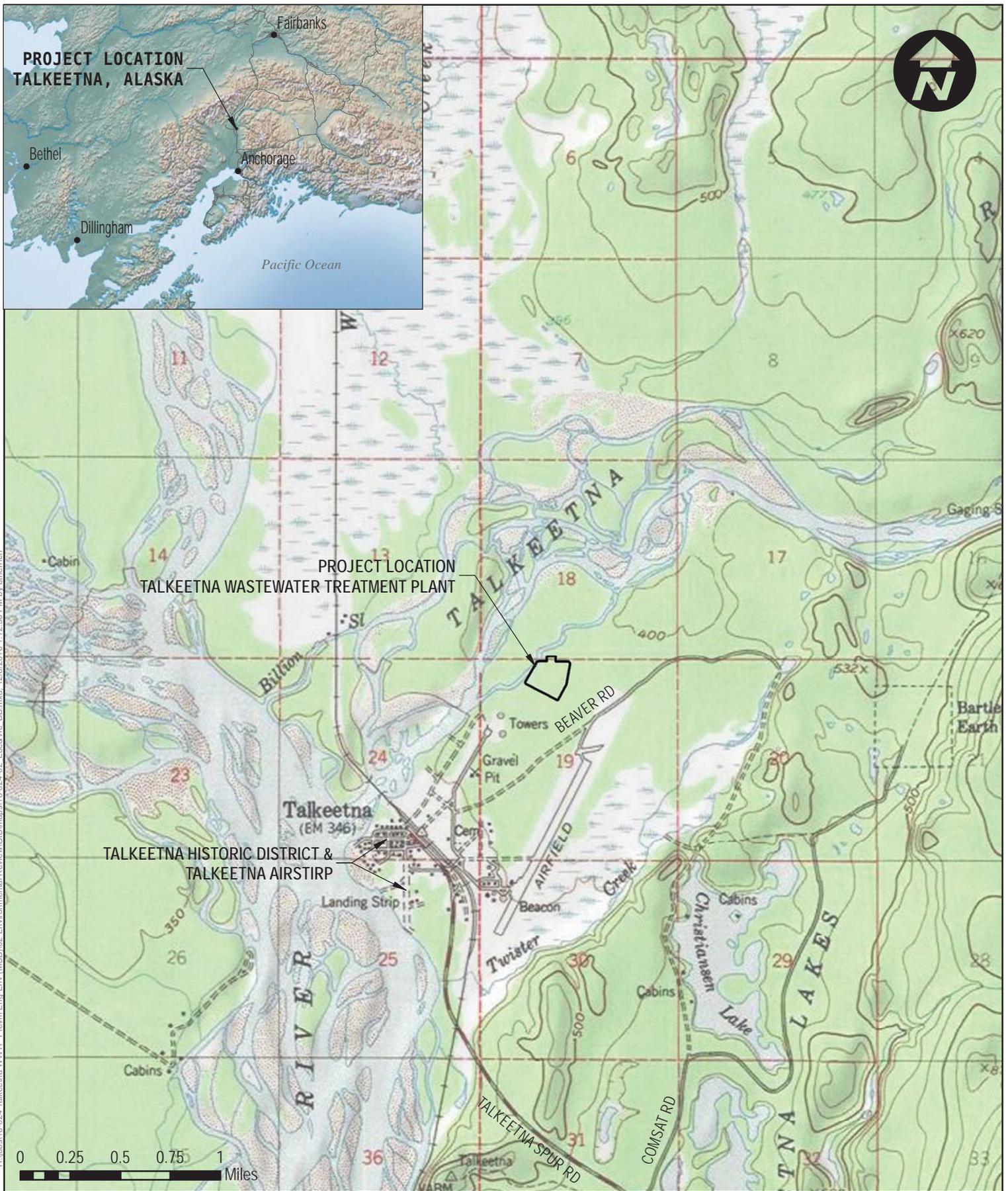


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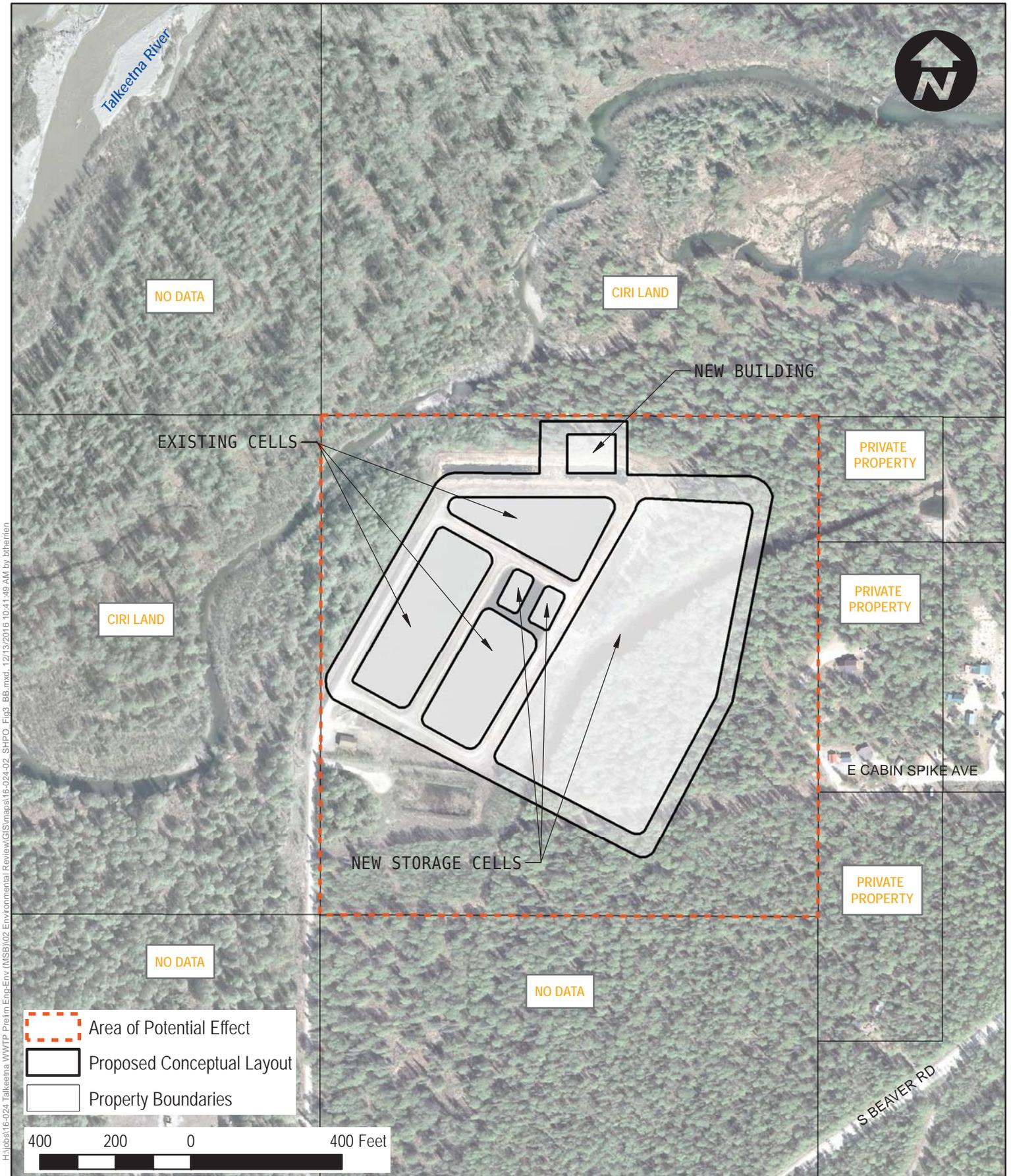
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 December 2016

Figure 2
Existing Talkeetna Wastewater Treatment Facility



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Figure 3
Area of Potential Effect &
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