Application for Wetland Permit

Laurel Acres Subdivision Block 9, Lot 1

Application for Wetland Permit or Amendment to AWMP

Municipality of Anchorage
Planning Department
PO Box 196650
Anchorage, AK 99519-6650

Notice to Applicant: It is your responsibility to comply with all applicable laws and to obtain other permits that may be necessary, such as a permit from the U.S. Army Corps of Engineers to dredge or fill material into waters of the U.S. It is your responsibility to determine the other laws or permitting schemes applicable to your property.

APPLICANT*			APPLICANT REPRESENTATIVE (if any)		
Name (last, first)			Name (last, first)		
Ball, Glenn			McKnight, Alice		
Mailing Address			Mailing Address		
6151 A Street			3500 Arctic Blvd, Suite 102		
City	State	Zip	City	State	Zip
Anchorage	AK	99518	Anchorage	AK	99503
Contact Phone – Day	Evening		Contact Phone – Day	Evening	
907-227-5216			907-522-4337		
E-mail			E-mail		
americanland@alaska.net			amcknight@3tieralaska.com		

*Report additional applicants or disclose other co-owners on supplemental form. Failure to divulge other beneficial interest owners may delay processing of this application.

PROPERTY INFORMATION

Property Tax # (000-000-00-000): 012-494-01-000

Site Street Address: Western terminus of W 92nd Ave

Current Legal Description: (use additional sheet if necessary)

Laurel Acres BLK 9 LT 1

Zoning:	Acreage:	Grid #:	Underlying Plat #:
R1	3.8-acres	SW2429	710327

WETLAND PERMITTING AND SITE INFORMATION

☒ New Permit	☐ Amendment to a Wetland Permit - Original Case #	☐ Amendment to Anchorage Wetlands Management Plan

Type of Disturbance and/or Amendment Requested: Filling of 3.5-acres of non- jurisdictional wetland to utilize as a laydown yard for landscaping material and equipment.

Wetland Classification: ☐ "A" ☒ "B" ☐ "C" ☐ "D - Undesignated" ☐ "P - Potential" ☐ "U - Not Classified"

Wetland Site # 1138 or ☐ Site is not identified within the Anchorage Wetlands Management Plan

Acreage of wetlands to be disturbed: 3.5-acres

I hereby certify that (I am)(I have been authorized to act for) owner of the property described above and that I petition for a wetland permit review in conformance with Title 21 of the Anchorage Municipal Code of Ordinances. I understand that payment of the application fee is nonrefundable and is to cover the costs associated with processing this application, and that it does not assure approval of the permit.

Alice McKnight — 04/03/2026

Signature ☐ Owner ☒ Representative (Representatives must provide written proof of authorization) Date

Alice McKnight

Print Name

SUBMITTAL REQUIREMENTS (Only one copy of applicable items is required for initial submittal)

1 copy required:

- ☒ Signed application (original)
- ☒ Watershed sign off form, completed
- ☒ Jurisdictional Determination from the U.S. Army Corps of Engineers (if applicable)
- ☒ Wetland Delineation approved by the U.S. Army Corps of Engineers (if applicable)
- ☐ Anchorage Wetlands Assessment Methodology Form (if applicable)
- ☒ Project narrative explaining:
  - ☒ Justification for the disturbance
  - ☒ Amount and type of material taken from and/or placed on site
  - ☒ Project Timeline
  - ☒ Revegetation Plan
- ☐ Site plan to scale depicting, with dimensions:
  - ○ area of disturbance
  - ○ delineated wetland boundary
- ☒ Photographs of the project area
- ☒ Final drainage plan

(Additional information may be required.)

MUNICIPAL WETLAND POLICY

In considering any disturbance to wetlands identified within the *Anchorage Wetlands Management Plan*, the Municipality uses the following criteria to guide its decision. The Director shall consult the Watershed & Natural Resources Advisory Commission for a recommendation on any permit application for an activity disturbing a class A wetland of any size, a class B wetland of any size, or disturbing 1 (one) acre or more of a class C wetland in total, even if spread across multiple parcels.

1. The applicant has demonstrated minimized individual and cumulative impacts to the wetland unit through the implementation of best management practices; and

2. The area of disturbance is necessary to allow for the development of the proposed use and avoids excessive disturbance as much as possible; and

3. The wetland unit is subject to specific protections such as special limitations, easements, or has been designated for future public use for recreation, wildlife viewing, ecological function, and/or flood mitigation; and

4. Adverse impacts to adjacent or downstream wetlands, streams, aquatic resources, and drainage facilities will be mitigated to the best extent possible; and

5. The disturbance activity and/or development is consistent with the purpose and goals of the *Anchorage Wetlands Management Plan*, as well as the goals, objectives, and policies of the comprehensive plan.

The applicant shall receive a response within 30 days from the date of submission

Accepted by:	Fee:	Case Number:	Decision Date

Laurel Acres Block 9, Lot 1
Wetland Permit Narrative

Project Description

American Landscaping LLC contracted 3-Tier Alaska (3TA) to perform a wetland delineation within the Laurel Acres Subdivision, Block 9, Lot 1 (hereafter referred to as the subject property) in Anchorage, Alaska. The subject property is approximately 3.8-acres* in area and borders the Dimond Estates Mobile Home park to the north with largely undeveloped land to the south, west, and east. The subject property is owned by American Landscaping, who intend to develop the property as a laydown yard to support commercial operations.

In July of 2025, 3TA completed a wetland delineation of the subject property and surrounding area. The area is classified as a wetland on the Municipality of Anchorage (MOA) Wetland Mapper and the U.S. Fish and Wildlife Service, National Wetland Inventory mapper. During this delineation, 3TA determined that the subject property consists of wetlands with no observed surface connection or conveyance to waters of the United States (WOTUS). Consequently, 3TA concluded the subject property wetlands could not be classified as WOTUS and were not subject to federal jurisdiction per Section 404 of the Clean Water Act (33 U.S. Code 1344).

3TA submitted the wetland delineation report with these findings to USACE for review on October 17, 2025 and requested concurrence in the form of an approved jurisdictional determination (AJD). After some back-and-forth correspondence and internal deliberation, the USACE eventually agreed with 3TA's findings on March 24, 2026 and began the process of issuing the requested AJD.

At this time, 3TA has not yet received the AJD from USACE. The source of this delay is the direct result of a Special Public Notice issued by USACE to the general public on October 10, 2024. The notice states that going forward, USACE will prioritize projects that explicitly request a permit. The intent of this prioritization effort is to expedite approvals for those projects proposing permanent impacts to WOTUS. Unfortunately, the AJD issuing process was further deprioritized in 2025 by Executive Orders 14241 and 14156, which elevated the prioritization of projects deemed critical to mining and energy development for the purpose of national security. Therefore, under current practice, issuing AJDs are ranked by USACE as low priority and lack a formal timeline.

We understand that MOA has recently decided to assert jurisdiction over wetlands within its boundaries that USACE determines are not under federal jurisdiction. Therefore, on behalf of American Landscaping, 3TA is applying for a MOA Wetland Permit for proposed wetlands development. Given this, 3TA is requesting that MOA consider USACE's email correspondence received March 24, 2026 as a reasonable AJD substitute. 3TA will provide the MOA with the final AJD once released by USACE.

*Note: The original wetland delineation report provided to USACE indicates the parcel size is 3.2-acres in area. This number was taken from the MOA's Property Mapper. During additional review of the subject property and plat, 3TA determined the actual size of the lot to be 3.8-acres in area as indicated by the attached plat for Block 9 of the Laurel Acres Subdivision.

Justification for the Disturbance

American Landscaping plans to develop the subject property for use as a laydown yard for landscaping materials and equipment. The disturbance of wetlands within the subject property is justified due to the limited availability of undeveloped uplands within Anchorage. The location of the subject property will provide the most practical proximity to efficiently serve clients within Anchorage.

Amount and type of material taken from and/or placed on site

The proposed development would occur over several years and include excavation of up to 70,000 cubic yards of material from the 3.5-acre site. Throughout this process, the subject property would be incrementally filled with up to 70,000 cubic yards of suitable material needed to construct the proposed laydown yard.

Project Timeline

American Landscaping plans to begin construction in May of 2026. Construction of the laydown yard is anticipated by October 2029.

Revegetation Plan

American Landscaping does not have a revegetation plan for this project as existing vegetation will be left in place along the perimeter of the subject property. There are no plans to revegetate disturbed areas.

Municipal Wetland Policy

1. *The applicant has demonstrated minimized individual and cumulative impacts to the wetland unit through the implementation of best management practices; and*

   American Landscaping plans to use the Minimization and Habitat Avoidance Best Management Practice (BMP) identified in the Anchorage Wetlands Management Plan by ensuring equipment is not serviced nor stored in wetlands or near watercourses/water bodies, nor shall equipment encroach beyond the project area, in accordance with AMC 15.40 or "New" AMC 21.07.040F.2. and 21.07.040F.3.

   Additionally, to reduce the potential for sediment and pollutant discharges to the Anchorage Municipal Separate Storm Sewer System (MS4) and adjacent wetlands, American Landscaping will develop a Type III Storm Water Pollution Prevention Plan (SWPPP). The SWPPP will include establishing a buffer zone around the project area and installing storm drain protection measures at the catch basins along 92nd Avenue.

2. *The area of disturbance is necessary to allow for the development of the proposed use and avoids excessive disturbance as much as possible; and*

   Given the limited amount of undeveloped upland in Anchorage, opportunities for commercial and residential growth remain limited. As this wetland is not considered WOTUS, this lot is the best

option for the applicants' desired purpose. Development of the entire lot is essential to provide the necessary space to support proposed commercial operation.

3. *The wetland unit is subject to specific protections such as special limitations, easements, or has been designated for future public use for recreation, wildlife viewing, ecological function, and/or flood mitigation; and*

   The wetland unit is not subject to specific protections and has not been designated for future public use for recreation, wildlife viewing, ecological function and/or flood mitigation.

4. *Adverse impacts to adjacent or downstream wetlands, streams, aquatic resources, and drainage facilities will be mitigated to the best extent possible; and*

   The applicant will develop and implement a SWPPP to minimize impacts of stormwater runoff to adjacent wetlands. Additionally, the proposed vegetative buffer zone surrounding the development will minimize impacts to surrounding wetlands.

5. *The disturbance activity and/or development is consistent with the purpose and goals of the Anchorage Wetlands Management Plan, as well as the goals, objectives, and policies of the comprehensive plan.*

   This project aligns with the goals outlined in the 2020 Anchorage Comprehensive Plan. Specifically, the Land Use and Transportation Policies and Strategies emphasize improving Anchorage's overall land use efficiency and compatibility while encouraging commercial development. This project proposes development of underused areas and aligns with policy 21 concerning new commercial development.

Watershed Sign Off Form

WMS Archive File Name: 26Laurel AcresB9L1

WMS WATERCOURSE MAPPING SUMMARY

Per the requirements for watercourse verification outlined in Project Management and Engineering Operating Policy and Procedure #8 and Planning Department Operating Policy and Procedure #1 (*effective June 18, 2007*), MOA Watershed Management Services has inspected the following location for the presence or absence of stream channels or other watercourses, as defined in Anchorage Municipal Code (21.35).

- Project Case Number or Subdivision Name: Laurel Acres
- Project Location, Tax ID, or Legal Description: Laurel Acres Block 9, Lot 1
- Project Area (if different from the entire parcel or subdivision): Project area includes Lot 1 of Block 9 of the Laurel Acres subdivision at the western terminus of W 92nd Ave

In accordance with the requirements and methods identified, WMS verifies that this parcel, project area, or application:

X KBC **DOES NOT** contain stream channels and/or drainageways, as identified in WMS field or archival mapping information.*

_____ **DOES** contain stream channels and/or drainageways ***AND*** these are located and identified on submittal documents in general congruence with WMS field and archival mapping information.
*New or additional mapping **IS NOT REQUIRED**.**

_____ Contains stream channels and/or drainageways ***BUT*** one or more streams or other watercourses:
- are ***NOT*** shown on submittal documents, or
- are ***NOT*** depicted adequately on submittal documents for verification, or
- are ***NOT*** located or identified on submittal documents in general congruence with WMS field and archival mapping information.

*New or additional mapping **IS REQUIRED** and must be re-submitted for further review and verification.**

_____ Presence of stream channels and/or drainageways is unknown ***AND*** field verification is not possible at this time. WMS will verify as soon as conditions and prioritized resources allow.

* ***Streams omitted in error by WMS or others remain subject to MOA Code and must be shown in new mapping upon identification of the error.***

ADDITIONAL INFORMATION:

☐Y	☒N	WMS written drainage recommendations are available.	☐Preliminary	☐Final
☐Y	☒N	WMS written field inspection report or map is available.	☐Preliminary	☐Final
☐Y	☒N	Field flagging and/or map-grade GPS data is available.		

Inspection Certified By: **Date:** 3/26/26

USACE AJD Correspondence

Outlook

Fw: POA-2025-00289, revisiting connectivity

From Ryan Kingsbery <rkingsbery@3tieralaska.com>
Date Fri 3/27/2026 1:37 PM
To Alice McKnight <amcknight@3tieralaska.com>

Alice,

You can provide this email chain to the MOA as a PDF.

Ryan

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From: Manbeck, Rebecca S CIV USARMY CEPOA (USA) <Rebecca.S.Manbeck2@usace.army.mil>
Sent: Tuesday, March 24, 2026 10:07 AM
To: Ryan Kingsbery <rkingsbery@3tieralaska.com>; Mazer, Gregory J CIV USARMY CEPOA (USA) <Gregory.J.Mazer@usace.army.mil>
Subject: RE: POA-2025-00289, revisiting connectivity

Hi Ryan,

USACE concurs that given the circumstances, the artificially created barrier to shallow, subsurface flow is sufficient to infer that the two wetlands are not functioning as one. Although I

must prioritize processing other pending actions with mandatory timeframes, I will do my best to get the AJD completed as soon as possible.

Respectfully,

Rebecca (Becky) Manbeck
Regulatory Specialist
U.S. Army Corps of Engineers – Alaska District
Rebecca.S.Manbeck2@usace.army.mil
Phone: (907)-251-6716

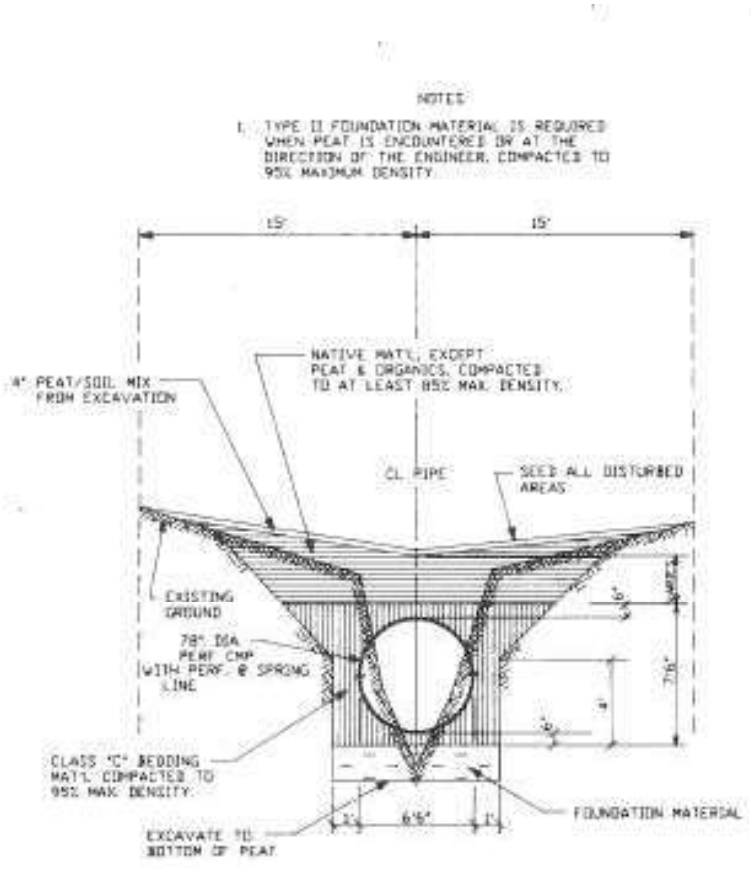
From: Ryan Kingsbery <rkingsbery@3tieralaska.com>
Sent: Friday, March 20, 2026 3:49 PM
To: Manbeck, Rebecca S CIV USARMY CEPOA (USA) <Rebecca.S.Manbeck2@usace.army.mil>; Mazer, Gregory J CIV USARMY CEPOA (USA) <Gregory.J.Mazer@usace.army.mil>
Subject: [Non-DoD Source] Re: POA-2025-00289, revisiting connectivity

Hi Becky,

Thank you for this email. I understand the Corps does not have a dedicated timeline for issuing AJDs but given Mr. Ball's current predicament, is it possible this AJD could be issued sooner than later? He will still need to provide this AJD to the Municipality of Anchorage (MOA) when requesting a municipal wetland permit. The MOA will not issue a wetland permit without the AJD.

Attached for your records are all the documents acquired from the MOA's Project Management & Engineering office. Our contacts at the MOA have primarily included Melinda Kohlhaas (Director/Municipal Engineer) and Kenna Billups (Watershed Manager). These were the individuals that confirmed it was their belief the engineered wetlands/sediment basin and pipe stream were a 'closed pipe system'.

I do want to note that I did find another typical pipe cross section on a detail sheet when looking over the 'PW004189' record drawings (Sheet 6). See screenshot below:



TYPICAL PIPE CROSS SECTION
(N.T.S.)

This is similar but differs from the other pipe stream cross section shared yesterday as it lacks that type II fill profile with the 1:2 slopes. If anything, it implies a slight concave profile exists at the ground surface, which as previously mentioned was not observed in the field. Despite this difference, the cross section indicates the same excavation limits (to bottom of peat) with Type II foundation fill material and 'Class C' bedding material were utilized. Another important difference is that this cross section notes the backfill material placed on top was comprised of compacted native material (with peat/organics removed) followed by a thin (4") layer of peat/soil mix placed at the surface. This tells me neither the 'A1-Histosol or Histel' or 'A2-Histic Epipedon' hydric soil indicators would be met. Again, no other hydric soil indicators were identified during our delineation effort, which suggests the presence of hydric soil indicators along the pipe stream is unlikely.

Would the Corps agree this cross section detail also appears to indicate the absence of a subsurface hydrologic connection? Like the detail sheet shared yesterday, it is my opinion that it seems unlikely any hydric soil indicators would be observed in and around the pipe stream.

Thanks and have a good weekend,

Ryan

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From: Manbeck, Rebecca S CIV USARMY CEPOA (USA) <Rebecca.S.Manbeck2@usace.army.mil>
Sent: Friday, March 20, 2026 10:57 AM
To: Ryan Kingsbery <rkingsbery@3tieralaska.com>; Mazer, Gregory J CIV USARMY CEPOA (USA) <Gregory.J.Mazer@usace.army.mil>
Subject: RE: POA-2025-00289, revisiting connectivity

Hi Ryan,

Given the provided information, USACE intends to move forward with processing a non-jurisdictional AJD for the review area. I will keep you informed of any significant updates during the process.

Please let me know if you have any questions.

Respectfully,

Rebecca (Becky) Manbeck

Regulatory Specialist

U.S. Army Corps of Engineers – Alaska District

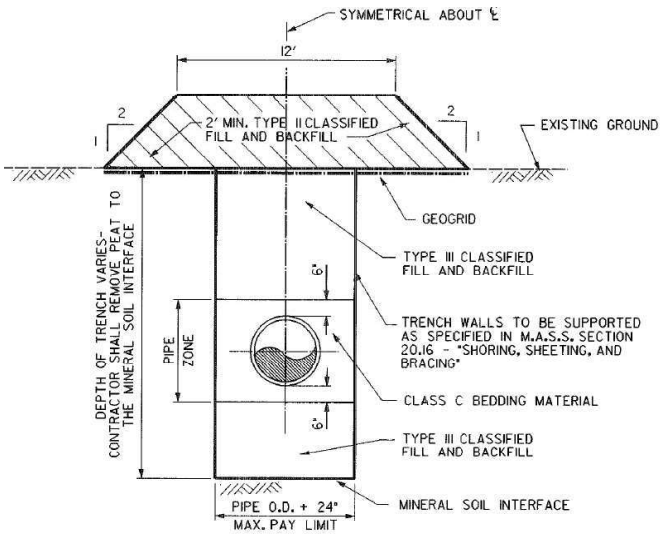
Rebecca.S.Manbeck2@usace.army.mil

Phone: (907)-251-6716

From: Ryan Kingsbery <rkingsbery@3tieralaska.com>
Sent: Thursday, March 19, 2026 1:31 PM
To: Mazer, Gregory J CIV USARMY CEPOA (USA) <Gregory.J.Mazer@usace.army.mil>; Manbeck, Rebecca S CIV USARMY CEPOA (USA) <Rebecca.S.Manbeck2@usace.army.mil>
Subject: [Non-DoD Source] Re: POA-2025-00289, revisiting connectivity

Hello Greg and Becky,

After reviewing the Municipality of Anchorage's (MOA) signed record drawings for the '97th Avenue and C Street Area Sedimentation Basin', I came across a detail sheet (Sheet 14) that shows the typical cross section of the pipe stream utilized for construction 'in wetlands or soft ground'. As I mentioned in the meeting, the MOA uses 'sedimentation basin' and 'engineered wetlands' somewhat interchangeably in these drawings. See attached detail sheet with a screenshot of cross section of interest provided below:



TYPICAL TRENCH SECTION IN WETLANDS OR SOFT GROUND F
NOT TO SCALE

The following is a list of observations and conclusions:

- First, excavation of the pipe stream trench appears to have extended to the peat layer/mineral soil interface. This tells me the 'A1-Histosol or Histel' hydric soil indicator was effectively removed during construction, which removes the chance of this primary indicator occurring in and around the pipe stream. Furthermore, this A1 indicator was the only hydric soil indicator observed within the subject property at sample points (SP1 and SP2) collected on July 3, 2025 during our wetland delineation effort. No other hydric soil indicators were identified during our delineation effort. This is important to note because it suggests that other hydric soil indicators existing along the pipe stream to be unlikely.

- Second, the detail sheet indicates a combination of different fill material types were utilized during construction. They include type III foundation material, class c bedding material, and type II fill/backfill at the surface. These fill types/classes correspond to MOA standards and specifications provided in the Division 20 - Earthwork manual. All three of these fill material types contain a relatively high percentage of rock/gravel by weight and coarse/medium sand comprising everything else. My takeaway from this is that hydric soils are likely not present in or immediately around the pipe stream.

- Third, although the detail sheet indicates a more defined 1:2 slope profile above the pipe stream, this does not quite match my observations in the field. As I mentioned in the meeting, in general I found the overall grade to be relatively flat, if not only slightly convex in areas. I also observed significant tire track rutting at the ground surface but did not observe any significant saturation underfoot or visible ponding along the pipe stream despite conditions being 'wetter than normal' as determined by the APT.

Greg, as you indicated in our meeting, the 'Memorandum on LRB-2021-01386' field memo does indeed appear to leave a lot to the agencies to decide whether or not a hydrologic connection is maintained under development. Specifically, the following, which originates from the January 2023 rule preamble:

For purposes of determining whether a wetland is "adjacent," artificial structures do not divide a wetland if a hydrologic connection is maintained between the divided portions of the wetland. Rather, the wetland is treated as one wetland. For example, if a wetland is divided by a road, a culvert could maintain a hydrologic connection. ***The agencies may also consider if a subsurface hydrologic connection is maintained, using indicators such as hydric soils, the permeability of the artificial structure, and/or the permeability of the soils below the artificial structure.***

Like you called out in your email, I find that last sentence (in bold) to be notable as I believe observations/conclusions made from this detail sheet indicate there should be enough information for the Corps to make an informed decision on whether or not subsurface hydrologic connection is present. In my opinion, this information suggests a complete lack of a subsurface hydrologic

connection as 1) peaty hydric soils (A1 indicator) were completely removed during construction, 2) a significant volume of fill material was placed during construction, and 3) saturation/ponding was not observed on the ground surface during the wetland delineation effort despite 'wetter than normal' conditions being present. Please let me know if you agree.

Thank you,

Ryan

Ryan Kingsbery | General Manager & Senior Scientist

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From: Ryan Kingsbery <rkingsbery@3tieralaska.com>
Sent: Monday, March 16, 2026 4:57 PM
To: Mazer, Gregory J CIV USARMY CEPOA (USA) <Gregory.J.Mazer@usace.army.mil>; Manbeck, Rebecca S CIV USARMY CEPOA (USA) <Rebecca.S.Manbeck2@usace.army.mil>
Cc: Alice McKnight <amcknight@3tieralaska.com>
Subject: Re: POA-2025-00289, revisiting connectivity

Received - thanks Greg. I will look into this.

Ryan

Ryan Kingsbery | General Manager & Senior Scientist

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From: Mazer, Gregory J CIV USARMY CEPOA (USA) <Gregory.J.Mazer@usace.army.mil>
Sent: Monday, March 16, 2026 12:50 PM
To: Ryan Kingsbery <rkingsbery@3tieralaska.com>; Manbeck, Rebecca S CIV USARMY CEPOA (USA) <Rebecca.S.Manbeck2@usace.army.mil>
Cc: Alice McKnight <amcknight@3tieralaska.com>
Subject: RE: POA-2025-00289, revisiting connectivity

Thanks Ryan. It appears that the two wetland areas discussed in today's phone call may be delineated as separate areas. However, as discussed, it appears that they would be treated as one wetland for the purpose of assessing adjacency. As stated in the joint Corps/EPA memo on the topic that I've linked below, "For the purposes determining whether a wetland is "adjacent", artificial structures do not divide a wetland if a hydrologic connection is maintained between the divided portions o the wetland." In so doing, the Corps and the EPA may "consider if a subsurface hydrologic connection is maintained, using indicators such as hydric soils, the permeability of the artificial structure, and/or the permeability of the soils below the artificial structure."

https://www.epa.gov/system/files/documents/2024-02/lrb-2021-01386-joint-decision-memo_final_508c.pdf

V/r, Greg

US Army Corps of Engineers®

Greg Mazer
Project Manager, North Central Section | Regulatory Division | U.S. Army Corps of Engineers | Alaska District
Cell: 907.347.9059 | Regulatory Main Line: 907.753.2717

Website: www.poa.usace.army.mil/missions/regulatory

From: Ryan Kingsbery <rkingsbery@3tieralaska.com>
Sent: Monday, March 16, 2026 12:19 PM
To: Manbeck, Rebecca S CIV USARMY CEPOA (USA) <Rebecca.S.Manbeck2@usace.army.mil>
Cc: Alice McKnight <amcknight@3tieralaska.com>; Mazer, Gregory J CIV USARMY CEPOA (USA) <Gregory.J.Mazer@usace.army.mil>
Subject: [Non-DoD Source] Re: POA-2025-00289, revisiting connectivity

Hello Becky and Greg,

Since we discussed it, here are snapshots of the NWI vs MOA mapper. NWI is by no means 100% accurate but I believe it matches real world conditions along the pipe stream "cooridor" better than the MOA wetlands mapper.

NWI:

MOA:

Thanks again for your time.

Ryan

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From: Ryan Kingsbery <rkingsbery@3tieralaska.com>
Sent: Friday, March 13, 2026 11:35 AM
To: Manbeck, Rebecca S CIV USARMY CEPOA (USA) <Rebecca.S.Manbeck2@usace.army.mil>
Cc: Alice McKnight <amcknight@3tieralaska.com>; Mazer, Gregory J CIV USARMY CEPOA (USA) <Gregory.J.Mazer@usace.army.mil>
Subject: Re: POA-2025-00289, revisiting connectivity

Hi Becky,

11AM on Monday will work great. It will just be me on this call. I'll send out a Teams invite.

Thank you!

Ryan

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Ryan Kingsbery | General Manager & Senior Scientist

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From: Manbeck, Rebecca S CIV USARMY CEPOA (USA) <Rebecca.S.Manbeck2@usace.army.mil>
Sent: Thursday, March 12, 2026 2:36 PM
To: Ryan Kingsbery <rkingsbery@3tieralaska.com>
Cc: Alice McKnight <amcknight@3tieralaska.com>; Mazer, Gregory J CIV USARMY CEPOA (USA) <Gregory.J.Mazer@usace.army.mil>
Subject: RE: POA-2025-00289, revisiting connectivity

Hello Ryan,

Monday (3/16) at 1100 or 1300 AK time, Thursday (3/19) at 1300 AK time, or Friday (3/20) at 1400 AK time would probably work best. If those times don't work, just let me know when you're available and I am sure we can get something scheduled. Would you mind sending the information you've gathered for our review before the meeting so we can better assist with any questions or concerns?

Thank you,

Rebecca (Becky) Manbeck

Regulatory Specialist

U.S. Army Corps of Engineers – Alaska District

Rebecca.S.Manbeck2@usace.army.mil

Phone: (907)-251-6716

From: Ryan Kingsbery <rkingsbery@3tieralaska.com>
Sent: Thursday, March 12, 2026 9:39 AM
To: Manbeck, Rebecca S CIV USARMY CEPOA (USA) <Rebecca.S.Manbeck2@usace.army.mil>
Cc: Alice McKnight <amcknight@3tieralaska.com>
Subject: [Non-DoD Source] POA-2025-00289, revisiting connectivity

Hello Becky,

Concerning POA-2025-00289, it is my understanding that the 12/15/2025 meeting, which occurred between yourself, Mr. Glenn Ball, and Alice McKnight concluded with your belief that a site visit would need to be conducted at Lot 1, Block 9 of the Laurel Acres Subdivision during the 2026 growing season to effectively determine surface connectivity to WOTUS. Additionally, Alice and Mr. Ball agreed to engage with the Municipality of Anchorage to find design plans, construction drawings, or as-builts that would shed some light on constructed wetlands and conveyances in the immediate area of the property.

It has been a slow process but we have gathered some information from the MOA that I believe is useful and could facilitate a more timely determination process. I believe it would be beneficial to schedule a Teams meeting to discuss these new findings. Given the nature of Mr. Ball's predicament,

I'd like to suggest having this meeting sooner than later. Is there a date/time that works well for you next week?

Thank you,

Ryan

Ryan Kingsbery | General Manager & Senior Scientist

O 907-522-4337

E rkingsbery@3tieralaska.com

3305 Arctic Blvd, Suite 102

Anchorage, AK 99503

www.3tieralaska.com

3-Tier Alaska voted Top 2025 Family Friendly Workplace!

3-Tier Alaska Wetland Delineation Report

WETLAND DELINEATION REPORT FOR LAUREL ACRES SUBDIVISION

ANCHORAGE, ALASKA

Prepared for:

Glenn Ball
American Landscaping LLC
6151 A St
Anchorage, Alaska 99518

Prepared by:

3-TIER ALASKA
CIVIL • ENVIRONMENTAL • SURVEYING

Civil / Survey / Environmental Consulting: 326 Driveway Street, Fairbanks, AK 99701 (907) 451.7411
Environmental Engineering: 3305 Arctic Blvd., Ste. 102, Anchorage, AK 99503 (907) 522.4337

Project Number: 1826-02

October 2025

TABLE OF CONTENTS

TABLES

APPENDICES

ACRONYMS AND ABBREVIATIONS

3TA	3-Tier Alaska
APT	Antecedent Precipitation Tool
CFR	Code of Federal Regulations
EPA	United States Environmental Protection Agency
MOA	Municipality of Anchorage
MSL	mean sea level
NWI	National Wetlands Inventory
SP	sample point
USACE	United States Army Corps Engineers
WOTUS	Waters of the United States

1.0 INTRODUCTION

Mr. Glenn Ball, with American Landscaping, contracted 3-Tier Alaska (3TA) to perform a wetland delineation investigation at Lot 1, Block 9 of the Laurel Acres Subdivision (hereafter, subject property) in Anchorage, Alaska. Mr. Glenn Ball plans to harvest topsoil and construct a gravel pad on the subject property at a future date.

The purpose of this delineation was to identify, describe, and classify any encountered wetlands within and adjacent to the subject property. A component of this process involved determining whether encountered wetlands were under Clean Water Act jurisdiction.

2.0 PROJECT LOCATION

The subject property is located within Section 13, Township 12 N, Range 4W of the Seward Meridian. Coordinates for the approximate geographic center of the subject property are 61.13645° North, -149.893136° West. See Figure 1 in Appendix A for a vicinity map.

The subject property covers approximately 3.2-acres (140,000 square feet) and borders the Dimond Estates Mobile Home Park to the north with largely undeveloped land to the south, west, and east. Access to the site was from the western terminus of 92^{md} Avenue.

3TA did not observe distinct 'relatively permanent waterbodies' within or adjacent to the subject property. However, 3TA did observe stagnant water in a constructed ditch bordering the subject property along the southern property boundary. The ditch did not connect to any natural or constructed waterbodies. In the early 2000s, the Municipality of Anchorage (MOA) constructed a man-made wetland approximately 800-ft southeast of the subject property. The man-made wetland receives storm water from an area of concentrated urban development between King Street and Independence Drive to the east. Upon exiting the man-made wetland, water spills over a sheet pile dam and enters a 1-mile-long pipe stream before discharging to Campbell Lake. No other water enters or exits the pipe stream between the sheet pile dam and Campbell Lake. See Figure 2 in Appendix A for a site map showing area surrounding subject property.

3.0 PROJECT AREA

The subject property was relatively flat with an elevation of 82-feet above mean sea level (MSL) at the southern property boundary dropping to 80-feet above MSL at the northwest corner of the property boundary. The average slope of the subject property was approximately 0.3%. The subject property was predominantly vegetated with black spruce (*Picea mariana*), shrubby cinquefoil (*Dasiphora fruticosa*), horsetail (*Equisetum variegatum*), water sedge (*Carex aquatilis*), and tall cotton grass (*Eriophorum angustifolium*). See Figure 2 in Appendix A for a site map showing the elevation contours of the subject property and surrounding area.

3.1 PREVIOUS DISTURBANCE

3TA observed previous disturbance to vegetation and soil on all sides of the subject property just beyond the property boundaries. In the 1970s, a trench for the purpose of draining wetlands was constructed just beyond the southern property boundary. In the 1980s the vegetation appears to have been cleared just beyond the eastern property boundary for an unknown purpose. In the 1990s the area beyond the western

property boundary appears to have also been cleared for an unknown purpose. Fill appeared to have been placed between Dimond Estates Mobile Home Park and the northern property boundary in the early 2000s during construction of a gravel access road extending west beyond the terminus of 92nd Avenue. All documented disturbances just beyond the property boundaries occurred more than 20 years ago. Therefore, 3TA determined that 'normal circumstances' were present at the subject property and neighboring properties.

4.0 WETLAND DELINEATION

On behalf of Mr. Glenn Ball, Mr. Ryan Kingsbery and Mr. Evan Weinzirl with 3TA completed a wetland delineation investigation at the subject property and surrounding area on July 3, 2025. 3TA utilized the U.S. Army Corps of Engineers (USACE) Antecedent Precipitation Tool (APT), Version 2.0 to determine a climatic/hydrologic index score of '15' for the site visit date indicating conditions were wetter than normal. APT output is provided in Appendix B.

3TA determined wetland areas using the three-parameter approach as described in the *USACE Wetlands Delineation Manual (1987)* and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Alaska Region (Version 2.0) (2007)*. As such, to be classified as a wetland, a site must be dominated by 1) wetland plants (hydrophytes), 2) hydric soils, and 3) show evidence of wetland hydrology. 3TA personnel completed standard USACE *Wetland Determination Forms – Alaska Version 2.0 (ENG FORM 6116, September 2024)* at two representative locations within and adjacent to the subject property. See Figure 2 in Appendix A for a site map showing each sample point location.

Table 1 below summarizes the wetland determination for each sample point location. For additional details see the completed wetland determination forms in Appendix B. Photographs of each sample point location are provided in a photo log accompanying each wetland determination form.

Table 1: Summarized Sampling Point Results

Sample Point	Lat/Long Coordinates (decimal degrees)	Date Collected	Wetland Parameters			Sampling Area Within a Wetland (YES/NO)
			Hydrophytes Present (Y/N)	Hydric Soil Present (Y/N)	Wetland Hydrology Present (Y/N)	
SP1	61.136144°, -149.893344°	7/3/2025	Y	Y	Y	YES
SP2	61.136294°, -149.893536°	7/3/2025	Y	Y	Y	YES

Data from the two sample points contained three wetland indicators signifying wetlands were positively identified within the subject property.

3TA findings align with the Municipality of Anchorage (MOA) Wetland Map and the United States Fish and Wildlife Service National Wetlands Inventory (NWI) map. The MOA Wetland Map and NWI map also indicate that the large wetland within and around the subject property is not connected to any streams or lakes. The MOA and NWI wetland maps are included in Appendix C for reference.

5.0 IDENTIFIED WETLANDS

Data collected from this wetland delineation indicated that the entire 3.2-acre subject property is a wetland satisfying criteria provided in the USACE *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Alaska Region (Version 2.0) (2007)*. See Figure 3 in Appendix A for the wetland location within the subject property.

6.0 WETLAND DETERMINATION

On August 29, 2023, the U.S. Environmental Protection Agency (EPA) and USACE issued a final rule to amend the final '"Revised Definition of "Waters of the United States". This final rule conforms the definition of waters of the United States (WOTUS) to the U.S Supreme Court's May 25, 2023, ruling on *Sackett v. EPA et al* (No. 21-454) – https://www.supremecourt.gov/opinions/22pdf/21-454_4g15.pdf. The final ruling became effective on September 8, 2023. However, the State of Alaska joined 26 other states in litigation opposing the final rule. Therefore, the definition of WOTUS in Alaska is consistent with the 'pre-2015 regulatory regime' and the *Sackett v EPA et al* decision. Consequently, the jurisdictional categories for WOTUS are defined as the following:

1. *All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;*
2. *All interstate waters including interstate wetlands;*
3. *All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters:*

a. *Which are or could be used by interstate or foreign travelers for recreational or other purposes; or*
b. *From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or*
c. *Which are used or could be used for industrial purposes by industries in interstate commerce;*

4. *All impoundments of waters otherwise defined as waters of the United States under this definition;*
5. *Tributaries of waters identified in paragraphs (s)(1) through (4) of this section;*
6. *The territorial sea;*
7. *Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (s)(1) through (6) of this section; waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR 423.11(m) which also meet the criteria of this definition) are not waters of the United States.*

40 CFR Part 230.3(s)

Under the pre-2015 regulatory regime, consistent with the *Sackett v EPA et al* decision, the EPA and USACE will not assert jurisdiction based on the 'significant nexus' standard, will not assert jurisdiction over interstate wetlands solely because they are interstate, and will limit the scope of the [#3] provision to only relatively permanent lakes and ponds that do not meet one of the other jurisdictional categories. Furthermore, a Department of the Army/EPA Memorandum dated March 12, 2025 provided clarification on interpretation of 'continuous surface connection' wherein wetlands would only be considered jurisdictional should they directly abut WOTUS categories #1-6 as listed above. Thus, the memorandum rescinded the 'discrete features' standard, which effectively removed ditches, swales, pipes, and culverts as being considered a continuous surface connection.

3TA did not identify wetlands or waters on the subject property that met any of the jurisdictional categories provided in 40 CFR Part 230.3(s). Thus, 3TA believes no part of the subject property is under Clean Water Act jurisdiction.

7.0 CONCLUSION

On behalf of Mr. Glenn Ball, 3TA personnel conducted a wetland delineation investigation on July 3, 2025 at Lot 1, Block 9 of the Laurel Acres Subdivision. Mr. Glenn Ball intends to develop the subject property at a future date.

Based on data gathered from two representative sample locations, 3TA determined that these two sample points and their corresponding representative areas can be classified as a wetland with no observed connection or conveyance to WOTUS.

3TA requests USACE concurrence with these findings in the form of a 'No Permit Required' letter as Approved Jurisdictional Determinations are not being issued. This letter will then be provided to the MOA, Planning Department to acquire the necessary MOA Wetland Permit prior to development of the subject property.

REFERENCE CITED

Manual: Alaska Region (Version 2.0). J.S. Wakeely, R.W. Lichvar, and C.V. Noble, eds. ERDC/EL TR-07-23. U.S. Army Engineer Research and Development Center. Vicksburg, MS.

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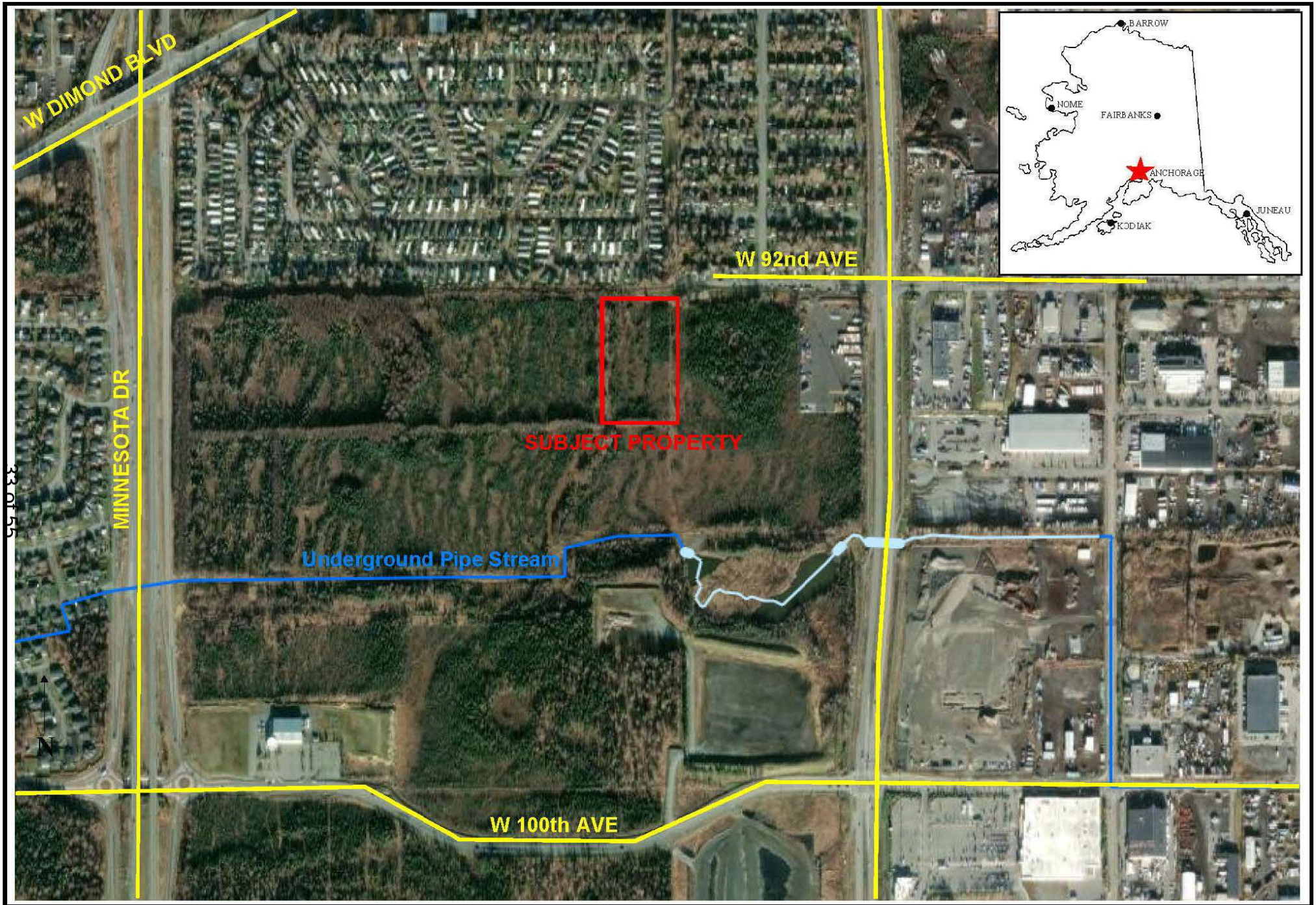
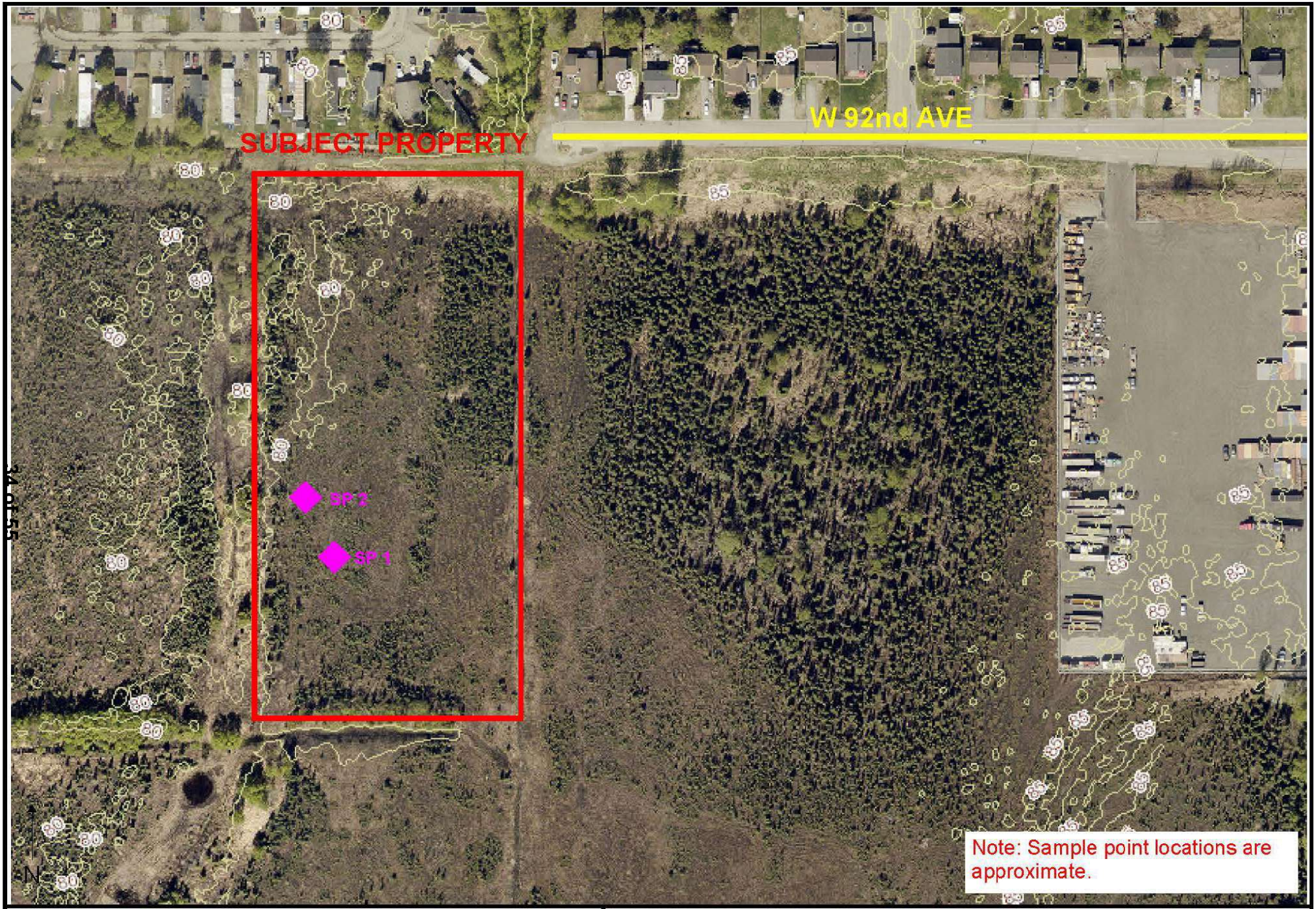
APPENDIX A

Figures



3-TIER ALASKA, INC. 3305 Arctic Boulevard, Suite 102 Anchorage, AK 99503	AMERICAN LANDSCAPING, LLC LAUREL ACRES WETLAND DELINEATION *(Source: WMS Drainage Viewer) Accessed: 09/09/2025*	FIGURE 1- VICINITY MAP	
PROJECT NO: 1826-02	FILE: PROJECTS/1826/02/APPENDICES/FIGURE 1	DATE:09/09/2025	SCALE: NOT TO SCALE



3-TIER ALASKA, INC. 3305 Arctic Boulevard, Suite 102 Anchorage, AK 99503	AMERICAN LANDSCAPING, LLC LAUREL ACRES WETLAND DELINEATION	FIGURE 2 - SITE MAP *(Source: MOA Map It!) Accessed: 09/05/2025*	
PROJECT NO: 1826-02	FILE: PROJECTS/1826/02/APPENDICES/FIGURE 2	DATE: 09/05/20258	SCALE: NOT TO SCALE

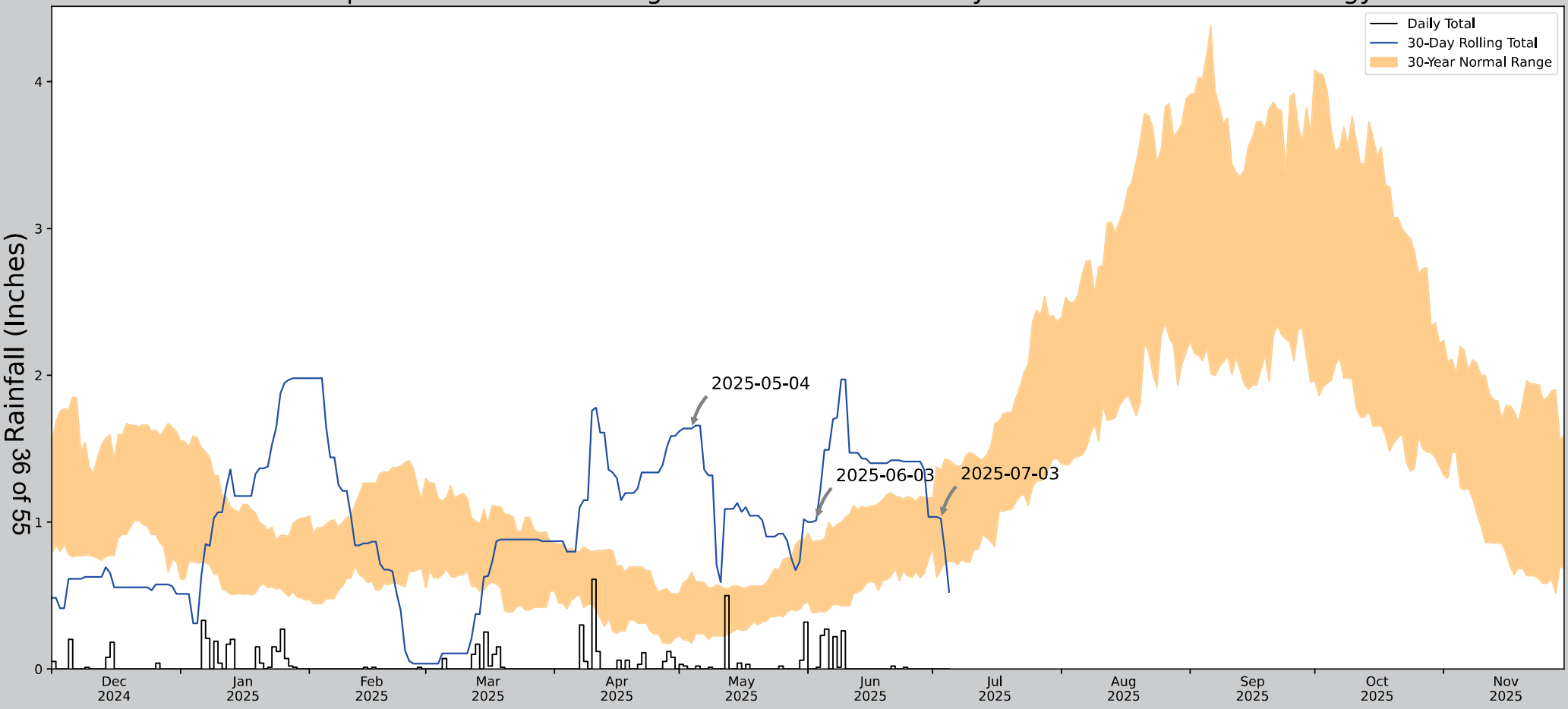
APPENDIX B

APT Output

Wetland Determination Forms

Photo Log

Antecedent Precipitation vs Normal Range based on NOAA's Daily Global Historical Climatology Network



Coordinates	61.136294, -149.893536
Observation Date	2025-07-03
Elevation (ft)	79.954
Drought Index (PDSI)	Not available
WebWIMP H_2O Balance	Dry Season

30 Days Ending	30th %ile (in)	70th %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2025-07-03	0.678346	1.355512	1.023622	Normal	2	3	6
2025-06-03	0.382283	0.873228	1.011811	Wet	3	2	6
2025-05-04	0.174803	0.659055	1.637795	Wet	3	1	3
Result							Wetter than Normal - 15

US Army Corps of Engineers

ERDC

Figures and tables made by the Antecedent Precipitation Tool Version 2.0

Developed by: U.S. Army Corps of Engineers and U.S. Army Engineer Research and Development Center

Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days Normal	Days Antecedent
ANCHORAGE FORECAST OFFICE	61.1561, -149.9847	130.906	3.334	50.952	1.67	9738	90
ANCHORAGE TED STEVENS INTL AP	61.1692, -150.0278	125.0	1.698	5.906	0.774	1615	0

Overgrown access road just north of northern property line at 61.137457, -149.892396. View is to the west.

Typical view of constructed ditch oriented (east-west) located southwest of the subject property at 61.135365, -149.89882.

Typical view of constructed ditch oriented (east-west) located southwest of the subject property at 61.135417, -149.897131.

Typical view of previously disturbed area oriented (north-south) located southeast of the subject property at 61.135026, -149.892131. View is to the north.

Typical view of wetland located due west of property at 61.135675, -149.895179. View is to the north.

Typical view of previously disturbed area oriented (north-south) located southwest of the subject property at 61.134574, -149.895310. View is to the northeast.

View of the sheet pile dam and man-made wetlands located approximately 800ft southeast of the subject property. View is to the southeast.

Sheet pile dam and man-made wetlands at 61.133653, -149.891577. View is to the south.

View of the pipe stream inlet at 61.133624, -149.891645. Sheet pile dam is behind photographer.

Picture of a utility vault located approximately 100ft northwest of sheet pile dam at 61.133882, -149.891931. View is to the east.

Photo of the previously disturbed pipe stream route taken from 61.133882, -149.892833. Access manhole is visible at center. View is to the west.

Photo of the previously disturbed pipe stream route taken from 61.133639, -149.895271. Access manhole is visible at center. View is to the north.

SP1 looking north.

SP1 looking south.

SP1 looking east.

SP1 looking west

SP1 test pit.

SP1—presence of ‘C4—Reduced Iron’ using dipyridyl paper

U.S. Army Corps of Engineers
WETLAND DETERMINATION DATA SHEET – Alaska Region
See ERDC/EL TR-07-24; the proponent agency is CECW-COR

OMB Control #: 0710-0024, Exp: 09/30/2027
Requirement Control Symbol EXEMPT:
(Authority: AR 335-15, paragraph 5-2a)

Project/Site: Laurel Acres | Borough/City: Municipality of Anchorage | Sampling Date: 2025-07-03
Applicant/Owner: American Landscaping | Sampling Point: SP1
Investigator(s): R. Kingsbery, E. Weinzirl | Landform (hillside, terrace, hummocks, etc.): Lowland
Local relief (concave, convex, none): Convex | Slope (%): 1
Subregion: W1 224 | Lat: 61.13615 | Long: -149.89333 | Datum: WGS 84
Soil Map Unit Name: 424 - Icknuun peat, 0 to 3 percent slopes | NWI classification: PSS1/EM1B
Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No ✓ (If no, explain in Remarks.)
Are Vegetation ____, Soil ____, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✓ No ____
Are Vegetation ____, Soil ____, or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ✓	No ____	**Is the Sampled Area within a Wetland?** Yes ✓ No ____
Hydric Soil Present?	Yes ✓	No ____	
Wetland Hydrology Present?	Yes ✓	No ____	

Remarks:
The Antecedent Precipitation Tool indicates 'wetter than normal' conditions were present with an index score of 15.

VEGETATION – Use scientific names of plants.

Tree Stratum	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
	=Total Cover		
50% of total cover:	20% of total cover:		

Sapling/Shrub Stratum			
1. Picea mariana	65	✓	FACW
2. Betula nana	10		FAC
3. Vaccinium uliginosum	10		FAC
4. Myrica gale	8		OBL
5. Rhododendron tomentosum	4		FACW
6. Andromeda polifolia	1		FACW
	98	=Total Cover	
50% of total cover: 49.00	20% of total cover: 19.60		

Herb Stratum			
1. Eriophorum scheuchzeri	3	✓	OBL
2. Carex aquatilis	2	✓	OBL
3. Sanguisorba canadensis	2	✓	FACW
4. Cornus suecica	1		FAC
5. Rubus chamaemorus	1		FACW
6.			
7.			
8.			
9.			
10.			
	9	=Total Cover	
50% of total cover: 4.50	20% of total cover: 1.80		

Plot Size (radius, or length x width) 15ft-r T, 15ft-r SS, 5ft-r H | % Bare Ground ____
% Cover of Wetland Bryophytes (Where applicable) ____ | Total Cover of Bryophytes ____

Dominance Test worksheet:
Number of Dominant Species That Are OBL, FACW, or FAC: 4 (A)
Total Number of Dominant Species Across All Strata: 4 (B)
Percent of Dominant Species That Are OBL, FACW, or FAC: 100.00 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	13	x 1 =	13
FACW species	73	x 2 =	146
FAC species	21	x 3 =	63
FACU species	0	x 4 =	0
UPL species	0	x 5 =	0
Column Totals:	107 (A)		222 (B)

Prevalence Index = B/A = 2.07

Hydrophytic Vegetation Indicators:
✓ Dominance Test is >50%
✓ Prevalence Index is ≤3.0[1]
___ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
___ Problematic Hydrophytic Vegetation[1] (Explain)
[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ✓ No ____

Remarks:

SOIL

Sampling Point: SP1

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 - 27							Mucky Peat	
-								
-								
-								
-								
-								
-								
-								

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ✓ Histosol or Histel (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Thick Dark Surface (A12)
- ___ Alaska Gleyed (A13)
- ___ Alaska Redox (A14)
- ___ Alaska Gleyed Pores (A15)
- ___ Iron Monosulfide (A18)

Indicators for Problematic Hydric Soils[3]:

- ___ Depleted Below Dark Surface (A11)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Red Parent Material (F21)
- ___ Very Shallow Dark Surface (F22)
- ___ Alaska Redox With 2.5Y Hue
- ___ Alaska Gleyed Without Hue 5Y or Redder Underlying Layer
- ___ Other (Explain in Remarks)

[3]One indicator of hydrophytic vegetation, one primary indicator of wetland hydrology, and an appropriate landscape position must be present unless disturbed or problematic.

Restrictive Layer (if observed):

Type: ___

Depth (inches): ___

Hydric Soil Present? Yes ✓ No ___

Remarks:

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (any one indicator is sufficient)

- ___ Surface Water (A1)
- ✓ High Water Table (A2)
- ✓ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Marl Deposits (B15)
- ✓ Hydrogen Sulfide Odor (C1)
- ___ Dry-Season Water Table (C2)
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ___ Water-Stained Leaves (B9)
- ___ Drainage Patterns (B10)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ✓ Presence of Reduced Iron (C4)
- ___ Salt Deposits (C5)
- ✓ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ✓ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present?	Yes ___	No ✓	Depth (inches): ___
Water Table Present?	Yes ✓	No ___	Depth (inches): 12
Saturation Present? (includes capillary fringe)	Yes ✓	No ___	Depth (inches): 0

Wetland Hydrology Present? Yes ✓ No ___

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

VEGETATION Continued – Use scientific names of plants. Sampling Point: SP1

Tree Stratum	Absolute % Cover	Dominant Species?	Indicator Status
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
	=Total Cover		
50% of total cover:		20% of total cover:	
Sapling/Shrub Stratum			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
	98 =Total Cover		
50% of total cover:	49.00	20% of total cover:	19.60
Herb Stratum			
11.			
12.			
13.			
14.			
15.			
16.			
17.			
18.			
19.			
20.			
21.			
22.			
	9 =Total Cover		
50% of total cover:	4.50	20% of total cover:	1.80

Definitions of Vegetation Strata:

Tree – Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub – Woody plants less than 3 in. DBH, regardless of height.

Herb – All herbaceous (non-woody) plants, regardless of size.

Remarks:

SP2 looking north.

SP2 looking south.

SP2 looking east.

SP2 looking west.

SP2 test pit.

SP2—presence of ‘C4—Reduced Iron’ using dipyridyl paper

U.S. Army Corps of Engineers
WETLAND DETERMINATION DATA SHEET – Alaska Region
See ERDC/EL TR-07-24; the proponent agency is CECW-COR

OMB Control #: 0710-0024, Exp: 09/30/2027
Requirement Control Symbol EXEMPT:
(Authority: AR 335-15, paragraph 5-2a)

Project/Site: Laurel Acres | Borough/City: Municipality of Anchorage | Sampling Date: 2025-07-03
Applicant/Owner: American Landscaping | Sampling Point: SP2
Investigator(s): R. Kingsbery, E. Weinzirl | Landform (hillside, terrace, hummocks, etc.): Lowland
Local relief (concave, convex, none): Concave | Slope (%): 0
Subregion: X1 229 | Lat: 61.13629 | Long: -149.89353 | Datum: WGS 84
Soil Map Unit Name: 424 - Icknuun peat, 0 to 3 percent slopes | NWI classification: PSS1/EM1B
Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No ✓ (If no, explain in Remarks.)
Are Vegetation ____, Soil ____, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✓ No ____
Are Vegetation ____, Soil ____, or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ✓	No ____	**Is the Sampled Area within a Wetland?** Yes ✓ No ____
Hydric Soil Present?	Yes ✓	No ____	
Wetland Hydrology Present?	Yes ✓	No ____	

Remarks:
The Antecedent Precipitation Tool indicates 'wetter than normal' conditions were present with an index score of 15.

VEGETATION – Use scientific names of plants.

Tree Stratum	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
	=Total Cover		
50% of total cover:	20% of total cover:		

Sapling/Shrub Stratum	Absolute % Cover	Dominant Species?	Indicator Status
1. Dasiphora fruticosa	35	✓	FAC
2. Picea mariana	10		FACW
3. Vaccinium uliginosum	10		FAC
4. Myrica gale	5		OBL
5.			
6.			
	60	=Total Cover	
50% of total cover: 30.00	20% of total cover: 12.00		

Herb Stratum	Absolute % Cover	Dominant Species?	Indicator Status
1. Equisetum variegatum	80	✓	FACW
2. Carex aquatilis	40	✓	OBL
3. Eriophorum angustifolium	40	✓	OBL
4.			
5.			
6.			
7.			
8.			
9.			
10.			
	160	=Total Cover	
50% of total cover: 80.00	20% of total cover: 32.00		

Plot Size (radius, or length x width) 30ft-r T, 15ft-r SS, 5ft-r H | % Bare Ground ____
% Cover of Wetland Bryophytes (Where applicable) ____ | Total Cover of Bryophytes ____

Dominance Test worksheet:
Number of Dominant Species That Are OBL, FACW, or FAC: 4 (A)
Total Number of Dominant Species Across All Strata: 4 (B)
Percent of Dominant Species That Are OBL, FACW, or FAC: 100.00 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	85	x 1 =	85
FACW species	90	x 2 =	180
FAC species	45	x 3 =	135
FACU species	0	x 4 =	0
UPL species	0	x 5 =	0
Column Totals:	220 (A)		400 (B)

Prevalence Index = B/A = 1.81

Hydrophytic Vegetation Indicators:
✓ Dominance Test is >50%
✓ Prevalence Index is ≤3.0[1]
____ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
____ Problematic Hydrophytic Vegetation[1] (Explain)
[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ✓ No ____

Remarks:

SOIL

Sampling Point: SP2

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 - 30							Peat	
-								
-								
-								
-								
-								
-								
-								

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ✓ Histosol or Histel (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Thick Dark Surface (A12)
- ___ Alaska Gleyed (A13)
- ___ Alaska Redox (A14)
- ___ Alaska Gleyed Pores (A15)
- ___ Iron Monosulfide (A18)

Indicators for Problematic Hydric Soils[3]:

- ___ Depleted Below Dark Surface (A11)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Red Parent Material (F21)
- ___ Very Shallow Dark Surface (F22)
- ___ Alaska Redox With 2.5Y Hue
- ___ Alaska Gleyed Without Hue 5Y or Redder Underlying Layer
- ___ Other (Explain in Remarks)

[3]One indicator of hydrophytic vegetation, one primary indicator of wetland hydrology, and an appropriate landscape position must be present unless disturbed or problematic.

Restrictive Layer (if observed):

Type: ___

Depth (inches): ___

Hydric Soil Present? Yes ✓ No ___

Remarks:

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (any one indicator is sufficient)

- ✓ Surface Water (A1)
- ✓ High Water Table (A2)
- ✓ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Marl Deposits (B15)
- ✓ Hydrogen Sulfide Odor (C1)
- ___ Dry-Season Water Table (C2)
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ___ Water-Stained Leaves (B9)
- ___ Drainage Patterns (B10)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ✓ Presence of Reduced Iron (C4)
- ___ Salt Deposits (C5)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ✓ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present?	Yes ✓	No ___	Depth (inches): 4		
Water Table Present?	Yes ✓	No ___	Depth (inches): 2		
Saturation Present? (includes capillary fringe)	Yes ✓	No ___	Depth (inches): 0	**Wetland Hydrology Present?**	Yes ✓ No ___

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

VEGETATION Continued – Use scientific names of plants. Sampling Point: SP2

Tree Stratum	Absolute % Cover	Dominant Species?	Indicator Status
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
	=Total Cover		
50% of total cover:	20% of total cover:		
Sapling/Shrub Stratum			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
	60 =Total Cover		
50% of total cover: 30.00	20% of total cover: 12.00		
Herb Stratum			
11.			
12.			
13.			
14.			
15.			
16.			
17.			
18.			
19.			
20.			
21.			
22.			
	160 =Total Cover		
50% of total cover: 80.00	20% of total cover: 32.00		

Definitions of Vegetation Strata:

Tree – Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub – Woody plants less than 3 in. DBH, regardless of height.

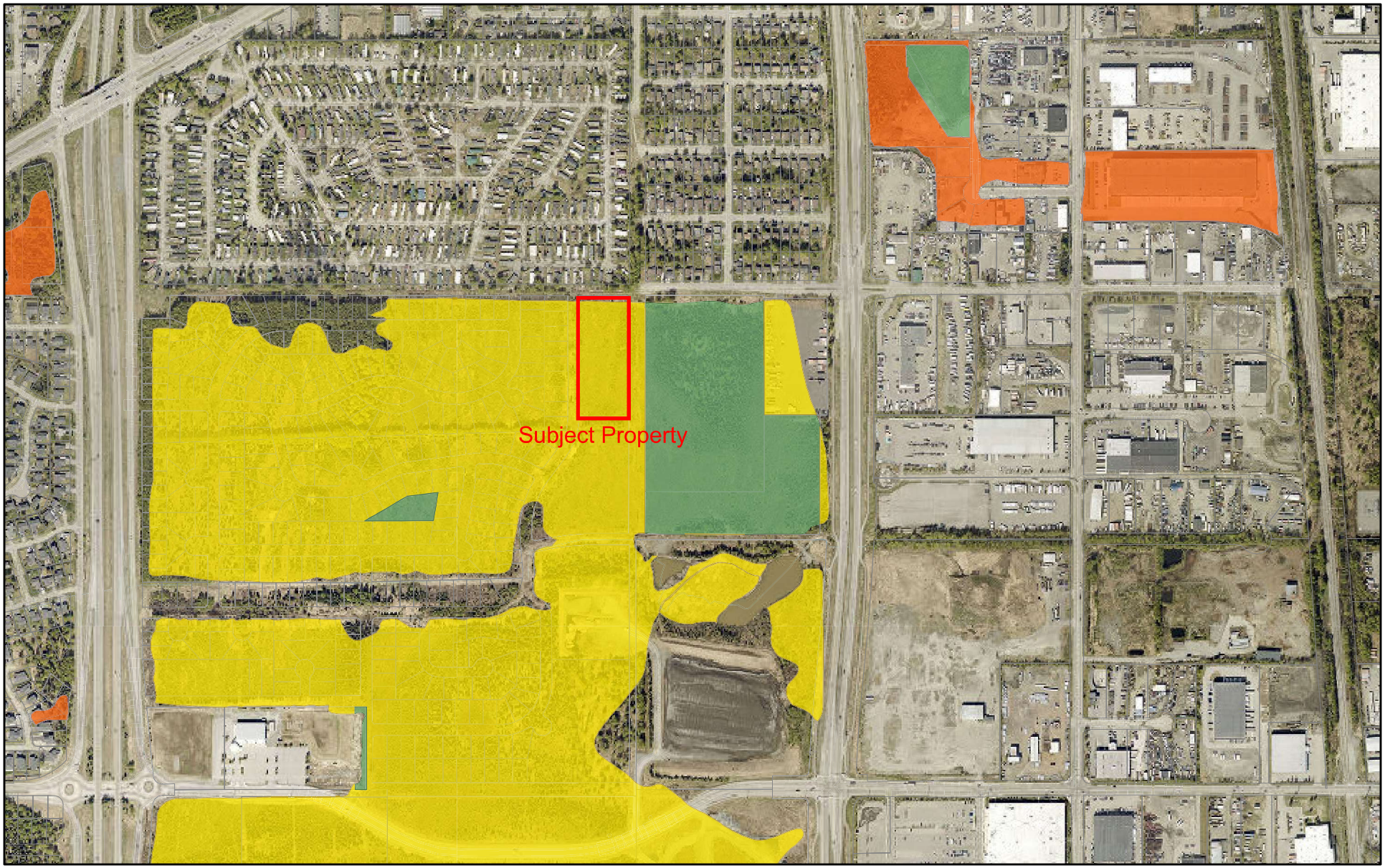
Herb – All herbaceous (non-woody) plants, regardless of size.

Remarks:

APPENDIX C

MOA and NWI Wetland Maps

MOA MapIt!



9/9/2025, 12:05:59 PM

Photo_2024
- Red: Band_1
- Green: Band_2
- Blue: Band_3

WMS Wetlands
- A - High Valuation
- B - Moderate Valuation
- C - Low Valuation
- Property Information

1:18,056

0 0.07 0.15 0.3 mi

0 0.1 0.2 0.4 km

Esri, USGS, FEMA, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

MOA GDIC

U.S. Fish and Wildlife Service
National Wetlands Inventory

Laurel Acres NWI

September 9, 2025

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

Drainage Plan

3-TIER ALASKA, INC. 3305 Arctic Blvd, Suite 102 Anchorage, Alaska 99503		American Landscaping LLC Laurel Acres Wetland Permitting	FIGURE 1 DRAINAGE PLAN
PROJECT NO:1826-02	FILE: PROJECTS1826/02/MOA PERMITTING/DRAINAGE PLAN	DATE:03/26/2026	SCALE: AS SHOWN

Laurel Acres Subdivision Block 9, Plat

VICINITY MAP 1" =

UNSUBDIVIDED

NOTE:
NO DEVELOPMENT PERMITTED THAT REQUIRES SANITARY SEWER AND WATER UNTIL BOTH PUBLIC FACILITIES BECOME AVAILABLE FOR CONNECTION TO EACH LOT.

ARCTIC BOULEVARD

LOT 1
3.837 Acres

LOT 2
5.744 Acres

LOT 1
6.234 Acres

LOT 2
6.914 Acres

COLCHIS

DORIAN STREET

STREET

36th AVENUE

AVENUE

100th AVENUE

WEST 97th AVENUE

18 SEC. COR.

18 1/4 COR.

1/4 COR.

CTR. 1/4 COR. SEC. 13

30' Wide Drainage Easement

5' Wide Reserve Easement

30' Wide Drainage Easement

Wide Powerline & Telephone Utility Easement

53 of 55

CURVE DATA						
CURVE NUMBER	RADIUS	CHORD LENGTH	DELTA	ARC LENGTH	TANGENT LENGTH	CURVE NUMBER
1	50.00	90.96	229° 05' 15"	199.92	——	1
2	20.00	31.05	101° 51' 20"	35.56	24.64	2
3	270.00	150.29	32° 19' 12"	152.30	78.24	3
4	135.00	141.69	63° 18' 31"	149.17	83.23	4
5	50.00	63.89	79° 25' 35"	69.31	41.53	5
6	235.00	83.92	20° 34' 19"	84.38	42.65	6
7	20.00	27.15	85° 30' 00"	29.85	18.49	7
8	470.00	73.38	08° 57' 15"	73.45	36.80	8
9	500.00	79.04	09° 03' 16"	79.12	39.65	9
10	530.00	82.74	08° 57' 15"	82.83	41.50	10
11	20.00	29.39	94° 08' 29"	33.08	21.67	11
12	440.00	311.78	41° 30' 00"	318.69	166.70	12
13	300.00	222.38	37° 02' 42"	228.30	117.69	13

LEGEND:
- BLM or GLO BC Monument Existing
- D/O BC Monument set this survey
- All other corners are 5/8" X 30" Rebar set this survey
- 10' Wide Utility Easement each side of lot line except where noted
- Iron pipe existing

CERTIFICATE OF OWNERSHIP & D

We hereby certify that we are the owne property shown and described hereon. request approval of this plat, showing easements for public utilities, roadway alleys dedicated by us for public use.

Date: December 16, 1971.

OLYMPIC INC.
2056 E. NORTHERN LIGHTS BLVD.
ANCHORAGE, ALASKA

PETER G. ZAMARELLO

NOTARY'S ACKNOWLEDGEMENT:

Subscribed and sworn to before me t

16th day of Decembe

RUBY J. FRANKENFURTH NOTARY PUBLIC STATE OF ALASKA

NOTARY FOR

My commission expires 6-30

PLAT APPROVAL:

Plat approved by the Borough Plannin

this 3rd day of Nove

AUTHORIZED

SURVEYOR'S CERTIFICATE:

I, the undersigned registered surveyor, hereby certify that a land survey has been completed by me or under my direct supervision and that corners and monuments have been located and established and that the dimensions shown hereon are true and correct.

Date: December 16, 1971.

STATE OF ALASKA 49th NO. 813-S REGISTERED LAND SURVEYOR

71-327

~~RECORDED~~ FILED at Anchorage REC. DIST.
DATE 12-23-71
TIME 12:24 P.M.
G.A.A.B.

Revision Date	Description

PLAT OF

BLOCKS 4 & 9, LAUREL ACRES

A SUBDIVISION OF TRACT G-LAUREL ACRES

LOCATED WITHIN
NE1/4 SECTION 13, T.12N., R.4W., S.M., ALASKA
CONTAINING 25.433 ACRES

DICKINSON-OSWALD & PARTNERS
CONSULTING ENGINEERS
800 CORDOVA STREET
ANCHORAGE, ALASKA

DRAWN BY - MRJ.	DATE - 10-4-71	W.O.	GRID
CHECKED BY - MXO.	SCALE - 1" = 100'	5136	2-29

Ref. Dwgs 60-96, 60-97, 62-79

F.B. 284

Representative Authorization

Outlook

Re: Update on Laurel Acres Block 9, Lot 1

From americanland@alaska.net <americanland@alaska.net>
Date Tue 3/31/2026 1:40 PM
To Alice McKnight <amcknight@3tieralaska.com>; Ryan Kingsbery <rkingsbery@3tieralaska.com>

3-tier

Thank you for representing us on the LOT 1 BLK 9 Laurel acres permitting process. Please go ahead and sign on our behalf for permitting applications.

Thank you
Glenn Ball

On Tue, 31 Mar 2026 21:29:51 +0000, Alice McKnight <amcknight@3tieralaska.com> wrote:

Hi Glenn,

We are just finishing up the permit and associated materials.

As your representative, we can sign the application as long as we have written proof of authorization. If you can provide us with that in an email, we can go ahead and sign and submit the application.

Thanks,
Alice

3-TIER ALASKA
CIVIL • ENVIRONMENTAL • SURVEYING

Alice McKnight | Staff Scientist
O 907-522-4337
E amcknight@3tieralaska.com
3305 Arctic Blvd, Suite 102, Anchorage, AK 99503
www.3tieralaska.com

3-Tier Alaska voted Top 2025 Family Friendly Workplace!