



June 30, 2009

PND Project # 062065.01

Mr. Rich Jackson  
Regulatory Division  
Department of the Army  
U.S. Army Engineer District, Alaska  
PO Box 6898  
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Subject: POA-2000-495-M3  
Douglas Harbor Renovation – Applicant Proposed Mitigation

Dear Mr. Jackson:

This is written in response to your letter dated November 14, 2008 in which you requested applicant proposed mitigation statements. The following are our statements regarding avoidance, minimization and compensatory mitigation in accordance with 33 CFR Part 325.1(d)(7):

**1. Avoidance of impacts to waters of the U.S., including wetlands:**

The proposed aquatic disposal site in Gastineau Channel is a location that has a history of similar use. The site was originally identified by the Army Corps of Engineers (COE) and has been filled during two previous dredging operations in Douglas Harbor, once by the COE in 1997 and again by the City and Borough of Juneau (CBJ) in 2002. The proposed aquatic disposal site is nearby and directly accessible by a high volume dredge barge which will minimize excessive fuel consumption and material handling associated with other disposal alternatives. The need to construct material disposal sites in alternate tideland regions will be eliminated. The use of a silt containment boom will be mandated within the inner harbor in order to contain the dispersal of fine particles during dredging operations. The use of current monitoring devices can be mandated to ensure that off-loaded material settles within the disposal site boundaries in all ocean current orientations and velocities.

**2. Minimization of unavoidable impacts to waters of the U.S. including wetlands:**

The proposed dredging area, depth and resulting volume is the minimum required to ensure safe vessel navigation throughout the tidal range. Currently, vessels traveling through the southeastern portion of Douglas Harbor contact the seafloor at low tides which creates an unacceptable risk to life, property and the environment. Proposed slip lengths have been designed to accommodate the CBJ Docks and Harbor Department's public demand for larger vessel moorage thus reaffirming the need to dredge the basin to a safe depth. Vessel fairway and slip widths are currently designed to be slightly narrower than is standard in an effort to minimize the amount of dredging required.

**3. Compensation for unavoidable impacts to waters of the U.S., including wetlands:**

The proposed work at Douglas Harbor is being performed primarily as a deferred maintenance effort to replace existing deteriorated timber floats and piles, to demolish dilapidated timber dock structures and to complete maintenance dredging within an established and previously authorized harbor basin. Approximately one-half of the proposed dredge material volume lies within the COE maintained navigational basin.

All of the existing piles designated to be removed are creosote-treated timber. All new piles will be galvanized steel pipe, driven with a vibratory hammer where practical. All of the timber associated with the existing moorage floats and the boarding float designated to be removed are creosote-treated timber, including non-submerged elements such as decking, bullrails and stringers. These same timber elements will be treated with ACZA on the new floats. While the proposed volume of dredge material has been minimized to the greatest extent possible, the proposed project would result in an increase in aquatic habitat in Douglas Harbor by expanding the basin footprint.

For these reasons, additional compensatory mitigation should not be required.

The CBJ understands the importance of these issues and hope that our responses are found acceptable to the agencies. If you have questions, feel free to contact me at 907-586-2093. Thank you for your consideration.

Sincerely,  
PND Engineers, Inc. | Juneau Office



Andrew Schicht, P.E.  
Senior Engineer