

Firstencel, Heidi POA

From: armunro@gci.net on behalf of armunro [armunro@gci.net]
Sent: Monday, January 18, 2010 4:37 PM
To: Firstencel, Heidi POA
Cc: Hitselberger, Joseph P (DFG); Borough_Assembly@ci.juneau.ak.us; John_Stone@ci.juneau.ak.us; cbj clerk; rod swope; Mayor
Subject: Subject: DA permit number POA-2000-495-M3.

Importance: High

Attachments: PN2.pdf



PN2.pdf (36 KB)

Subject: DA permit number POA-2000-495-M3.
CBJ--Douglas Harbor--Removal and disposal of Hg and MeHg laden harbor bottom sediments.

Alan R. Munro,
120 W. 9th Street
Juneau, Alaska 99801
January 16, 2010
907-586-3694

Dear Heidi Firstencel:

Thank you for extending the official public comment period to February 5, 2010 thereby providing additional public response time. It is much appreciated.

I submit to you for consideration my opposition to the City and Borough of Juneau, Docks and Harbors, current plan for dredging, barging and dumping of approximately 45,000 tons of Douglas Harbor contaminated bottom sediments. CBJ plans call for dredging, barging and dumping at least this amount and quite possibly more, in a location outside the Harbor entrance in approximately 20 fathoms of Gastineau Channel marine waters.

I strongly object to this plan since these particular bottom sediments are known to be contaminated with inorganic mercury (Hg) and organic methylmercury (MeHg) a methylated and bioaccumulative environmental toxicant resulting from historic gold-mining activity in Douglas.

I strongly and firmly object to this plan for the following reasons: MeHg exists as bioaccumulative organic mercury via anaerobic, micro-organism process that is known by the medical profession to cause serious health problems when ingested by living organisms. Health problems thus incurred include: behavioral, hormonal, neuro-chemical and reproductive changes.

This is disturbing enough, however, even more disturbing is the fact that MeHg bioaccumulation, through a food-chain ascent process, produces one million times greater concentration than was present at the original source of pollution. In this particular case, Douglas Harbor bottom sediments. The uptake of organic mercury adversely effects end-stage predators, such as, we humans and other large marine life, such as, seal, sea-lion and whale. Also adversely effected are all other marine-environment species, such as, bear, mink, otter, eagles, ravens, crows, various sea and shore birds, halibut, crab, salmon, clams, krill, marine worms, minute marine organisms and intertidal marine plants. In other words, an entire marine-life environments would be effected by dredging and dumping MeHg contaminated harbor-bottom sediments into Gastineau Channel.

Subsistence is a cultural way of life in Alaska and in Juneau. In feeding my own family, I personally trap crab. Soak my clams in Gastineau Channel saltwater and catch halibut and salmon and collect seaweed from a small skiff in Gastineau Channel. I have done this every year since 1971. Also I know of and regularly observe, many other residents who are doing

the same thing. It should therefore be quite obvious to all, that Gastineau Channel is regularly used as a subsistence and recreational body of water and is very important to numerous local Juneau residents.

Gastineau Channel is extensively used because it is readily available, reasonably close to town and quite energy efficient to operate around as well as normally exhibiting relatively safe waters for small boat navigation.

Just recently, in conversation with a Docks and Harbors Board Member, I was told there was absolutely no cause for any alarm about increasing the presence of MeHg toxicity within the subsistence food-chain--and that furthermore I apparently didn't understand the issues involved.

Naturally, I totally disagree with this rather off-handed dismissal of the situation, especially since at one point CBJ was considering transporting this toxic sediment-waste to an upland dumpsite rather than dumping it directly into Gastineau Channel. Unfortunately, this particular plan was later abandoned due to budget and priority considerations.

It would also appear that all other dumping options were quickly dismissed due to cost factors. Instead it was finally decided to dredge, barge and then dump this toxic waste into Gastineau Channel--because it was cheaper to do so. This CBJ decision is simply a wrong-headed decision. It is the wrong decision in terms of overall CBJ budget priorities and wrong because it is promoting a deliberate act of environmental pollution and furthermore it is wrong because it will actually cause and not resolve, community health problems.

I must ask--how is it possible that CBJ can seriously consider befouling a well known and heavily used subsistence and recreational marine environment through the dumping of a highly toxic and dangerous pollutant into Juneau waters? Where are the federal EPA and state DEC?

Surely, our CBJ Administration and CBJ Assembly Members are capable of exercising considerably more respect and caution towards the well being of present and future generations of Juneau residents. I feel confident they are. And certainly, residents and visitors deserve to feel and know our unique marine environment is safe for the harvesting of all marine subsistence foods and for all other recreational use, as well.

Also, during your deliberations, please consider that the apparent need to dredge Douglas small boat harbor is apparently due, in large part, to a few large deep-draft boats that may have scraped bottom during some extremely low tide. But it is also equally important to know and to consider that Douglas Harbor is basically a small boat harbor. One that is used primarily by a large majority of shallow-draft, small boat owners. Therefore, I would suggest that a more concerted, creative and enlightened effort be looked at by Docks and Harbors in resolving this rather limited-in-scope moorage problem.

CBJ administration should quite willingly and responsibly take a renewed, fresh look at CBJ Docks and Harbors budget priorities, especially during these particularly difficult economic times for CBJ and hopefully well before the necessary USACE permits are actually issued for CBJ dredging and dumping operations. We are talking about highly toxic sediment wastes and they definitely should not be dumped into our local Gastineau Channel marine waters. Instead they should be trucked or otherwise transported to an appropriate and safe dumping site, well away from waterways and when the CBJ budget can afford it and not before.