



September 6, 2010

PND Project # 062065.01

Ms. Carrie Bohan
Project Review Supervisor
Division of Coastal and Ocean Management
Alaska Coastal Management Program

Subject: AK 1001-01J, POA-2000-495-M3
Douglas Harbor Renovation – Permit Application Modifications

Dear Ms. Bohan:

This is written to describe the proposed modifications to the referenced permit applications. These modifications are intended to address concerns raised by permitting agencies relating to the dredging of Douglas Harbor and the placement of dredged material at the designated Gastineau Channel disposal site.

We believe that the extensive Douglas Harbor soil testing conducted by CBJ to date has demonstrated that while trace amounts of mercury do exist in the proposed Douglas Harbor dredge material, unconfined disposal of the dredged material in the Channel would not pose a threat to the aquatic environment. However, in an effort to further alleviate concerns amongst the reviewing agencies regarding the environmental impacts of the proposed action, we are now offering to place a 6-inch thick sand with cobble cap over both the dredged material deposited in Gastineau Channel and over the newly exposed dredge surface in Douglas Harbor. This cap will serve to chemically and physically isolate and confine the Douglas Harbor material at both locations. A second permit modification we are proposing is to limit all dredging and disposal activities to between November 1 and March 15. With the addition of the sand cap at each location, and limiting the dredging to a time frame in which aquatic activity is low, we believe that impacts on competing uses including recreational activities, commercial and subsistence fishing will be negated.

The source of the cap material will be from one of two possible locations. The preferred source is sand with cobble material currently being dredged from the pond at the Juneau Airport. However, depending upon how much additional time it takes to ultimately receive final permits for the Douglas Harbor project, and depending upon some additional internal cost, availability and temporary storage issues that have yet to be finalized, material from this source may not prove the best option. In the event that the Airport sand is ultimately pursued for use as the capping material, we will perform a chemical screening of the material to verify the suitability for ocean placement if mandated. If the Airport sand option proves impractical, the capping material will be clean sand and rock purchased from local quarries. One point to note, in the attached sediment transport calculations, the grain size values used are taken from measured Airport sand gradations. In the event quarry material is utilized instead, the average grain size will exceed that of the Airport sand and consequently, would require an even higher velocity to induce grain movement.

Page 2
September 6, 2010

We ask that the agencies resume the review of the Douglas Harbor permit application with consideration of our agreement to cap both the disposal site and the new harbor surface.

We are available to meet with you if needed. We hope this can move the project forward.

Sincerely,
PND Engineers, Inc. | Juneau Office



Andrew Schicht, P.E.
Senior Engineer

cc: Heidi Firstencel, Army Corps of Engineers

Enclosures