

**APPENDIX E
CORRESPONDENCE
EMERGENCY BANK STABILIZATION
DILLINGHAM, ALASKA**

McConnell, Guy R POA

From: Robert Baumgartner [RobertB@bristolalliancefuels.com]
Sent: Tuesday, January 27, 2009 9:02 AM
To: McConnell, Guy R POA; Williams, David P POA
Cc: Phillip Baumgartner
Subject: City Shoreline Emergency Bank Stabilization, Dillingham, Alaska

U. S. Army Engineer District, Alaska
ATTN: CEPOA-EN-CW-ER (McConnell)
P.O. Box 6898
Elmendorf AFB, Alaska 99506

RE: City Shoreline Emergency Bank Stabilization, Dillingham, Alaska Report of November, 2008

Dear Mr. McConnell,

Having reviewed the Letter Report of November 2008 I want to take an opportunity to correct a misperception regarding support of this proposed project. On page 3 of Appendix D, Real Estate Plan, regarding "Known or Anticipated Support or Opposition to the Project", it states: "...only one known objection, the owner of Bristol Fuels, whose land is needed for the project. The owner indicated, he would not cooperate unless he got full access from his property to the harbor and a rock revetment would stop any use which would financially benefit him."

As the owner of the majority of the lands required for construction of the shoreline protection on the West side of the harbor, Bristol Express Fuels, Inc. has made various requests and suggestions as to our preferred alternatives for this project from our point of view. Alternative W-2 actually does accommodate some of our earlier concerns regarding access from the interior of the harbor to our lands. I had asked that a rock revetment not be constructed along the entire west side of the harbor, so that we might at some time in the future more easily access the harbor. The W-2 Alternative does this as it places a rock revetment only part way up the west side of the harbor. So, from a design point of view, Bristol Express Fuels appreciates the Corps' chosen alternative as the best alternative to accommodate future access to the west side of the harbor.

We do have a concern regarding access to the beach next to our bulkhead at the point where the rock revetment approaches the bulkhead. We currently access the beach on an occasional basis with a large Caterpillar and other equipment for the purpose of grooming and seasonal beach maintenance, to occasionally serve as a deadman, and to service vessels tied to the bulkhead for various reasons. We have done this for some time and will continue to have an ongoing need to access the beach directly adjacent to the east side of our bulkhead. I would hope that the plans can in some way accommodate an access corridor at or near this point so that we can continue our current use while maintaining the integrity of wave protection afforded by the proposed revetment.

Regardless of the alternative chosen and access issues, we have always been in favor of this project, as protection of the harbor and the fuel facility is of paramount importance to us as well as the entire community of Dillingham. Please be assured of our support and cooperation as the Corp and the City of Dillingham moves forward with this project.

Robert Baumgartner,
President
Bristol Express Fuels, Inc.
4141 B Street, Suite 207
Anchorage, AK 99503-5940
Phone: (907) 222-2828
Fax: (907) 222-1418
Cell: (907) 227-4122

RE City Shoreline Emergency Bank Stabilization Dillingham Alaska.txt
From: McConnell, Guy R POA
Sent: Tuesday, January 27, 2009 9:35 AM
To: 'Robert Baumgartner'; Williams, David P POA
Cc: 'Phillip Baumgartner'
Subject: RE: City Shoreline Emergency Bank Stabilization, Dillingham, Alaska

Thank you for taking the time to document this error. We will see that your correction goes into the public record for this project. Also, thanks for participating in our meeting last week and for the information you provided at that meeting.

Guy

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STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF COASTAL AND OCEAN MANAGEMENT

<http://www.alaskacoast.state.ak.us>

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GOVERNOR

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□ PIPELINE COORDINATOR'S OFFICE
411 WEST 4TH AVENUE, SUITE 2C
ANCHORAGE, ALASKA 99501-2343
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2/5/09

Chris Floyd
U.S. Army Corps of Engineers/Civil Works
CEPOA-EN-CW-ER
P.O. Box 6898
Elmendorf AFB, AK 99506-6898

Subject: Bank Stabilization, Small Boat Harbor, Dillingham
State ID No. AK 0901-09AA
Request For Additional Information

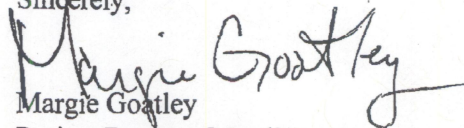
Dear Mr. Floyd:

Pursuant to the State of Alaska's review of your proposed project for consistency with the Alaska Coastal Management Program (ACMP), on 2/5/09 DCOM received a request for additional information from the Bristol Bay CRSA Coastal District (see enclosure). The BBCRSA requires the following information to determine if the proposed project is consistent with the ACMP:

If the information is not provided and found adequate by the requesting review participant by 2/23/09, Day 25, I will suspend the State ACMP review to allow time for the information exchange. In this event, I will notify all review participants that the review has been suspended.

If you have questions regarding the request for additional information, please contact me at (907)269-7474 or email margie.goatley1@alaska.gov.

Sincerely,


Margie Goatley
Project Review Coordinator

Enclosure

Cc:
USACE Regulatory Branch USACE

Michael Dombkowski	USCG
Sean Palmer	DEC - ANC
Fran Roche	DEC -JNU
Marla Carter	ADFG
Ellen Simpson	ADFG
Mike Daigneault	ADFG/Habitat
Dave Gann	DNR/DCOM
Adele Lee	DNR/DMLW/ACMP Liaison
SHPO	DNR/DPOR/SHPO
Linda Markham	ADOT&PF
Andrew DeValpine	Program Director/Coastal Contact

BRISTOL BAY CRSA
Box 849
DILLINGHAM, AK 99576
907. 842. 2666/FAX 907. 842. 2776.
BBCRSANT@NUSHTEL.COM

To: Margie Goatley, DCOM
From: Andrew deValpine, BBCRSA
RE: RFAI Dillingham Bank Stabilization, 0901-09AA

February 5, 2009

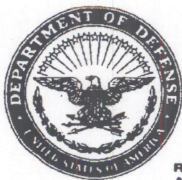
Ms. Goatley:

We have several questions after reviewing the US Army Corps of Engineers' EA on the Dillingham Bank Stabilization project.

1. How will the proposed breakwater affect sediment deposition around the mouth of the harbor in particular and how will it interact with structures up and downstream?
2. If we learn that the breakwater will create more material that needs dredging from the harbor and entrance, how will that add to the costs of dredging over the years?
3. How will the hardened west bank of the inner harbor basin affect the unhardened area immediately upstream from it?
4. How will the change in fluid dynamics created by the hardened west bank interact with the changes created by the new boat ramp the city will be installing just upstream and on the opposite side of the bank? Will this create further pressure on the eroding west bank upstream of the proposed hardened area – in particular the area just downstream from the culvert?
5. How will this deflection and acceleration of current affect the unprotected east side of the harbor?
6. Photo evidence suggests that erosion on the east bank of the harbor progressed steadily in the periods between large storms and isn't necessarily the direct and one-time result of large storms – how do boat-generated waves affect the inner harbor?
7. Regarding the dock-side of the plan, how will the proposed alternative affect erosion of the marshy area upstream of where the revetment turns inland?

Thank you for this opportunity to request more information.

Andrew deValpine
Director, Bristol Bay CRSA



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 6898
ELMENDORF AFB, ALASKA 99506-0898

Environmental Resources Section

MAR 3 2009

Mr. Andrew deValpine
Director, Bristol Bay CRSA
Box 849
Dillingham, AK 99576

Dear Mr. deValpine

In a letter to us dated February 5, 2009 (enclosed), the Alaska Division of Coastal and Oceans Management (DCOM) forwarded several comments from your office concerning the Corps' Environmental Assessment for the Dillingham Emergency Bank Stabilization project. Our responses to those comments are provided below:

Sedimentation: Several comments asked about possible changes in sediment deposition. The sedimentation rates at Dillingham harbor are currently so high that the dredge contractor must dredge the entrance channel each year just to reach the harbor. Most of this sediment settles from the ambient water body. In the Corps' judgment, the proposed design may alter some localized sedimentation patterns, but is unlikely to affect overall sedimentation rates. A sedimentation study to verify this would have been expensive, and probably would not have yielded useful information. Regardless of any changes to sedimentation rates or patterns, the Federal share of the maintenance dredging (100 percent of the cost) remains the same. The risk of increased costs from increased sedimentation rates would not be passed on to local entities.

West Bank: The west side of the revetment will extend through the area that is currently experiencing the greatest erosion and will key into the existing bank. This should not affect the unrevetted side of the revetment as the reduction in wave climate within the harbor will greatly reduce erosion throughout, and keying into the bank should help prevent flanking of the revetment.

Boat Launches: In the Corps' experience, angled boat launches typically do not affect the interior harbor wave climate or sedimentation patterns, in contrast to bulkheads and other perpendicular walls that can reflect waves and increase wave action in the harbor.

East Bank: The Corps agrees that the majority of the erosion observed on the east side has been caused by day-to-day wave action and boat wakes. The design of the harbor at Dillingham is, in fact, based on a 50-year design wave of 6.22 feet and not on extreme or rare events. Based on a diffraction analysis, the breakwater alignment will reduce the wave climate in the harbor to 1.2 feet, which should result in a significant reduction of the erosion observed along the harbor's east bank. Effects on the currents within the harbor should be minimal. As for boat wakes, the

City of Dillingham has the authority to regulate boat speeds in the harbor. Boat wakes within a small, well-regulated harbor should be negligible, and were not considered in the Corps' design.

If you need further clarification of these issues, please contact Mary Azelton, the Corps' project hydrological engineer, at (907) 753-5706.

Sincerely,



for

Guy R. McConnell
Chief, Environmental Resources Section

Encl

CF: M. Goatley, DCOM

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF COASTAL AND OCEAN MANAGEMENT

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3/23/09

Chris Floyd
U.S. Army Corps of Engineers/Civil Works
CEPOA-EN-CW-ER
P.O. Box 6898
Elmendorf AFB, AK 99506-09AA

SUBJECT: Bank Stabilization, Small Boat Harbor, Dillingham
State ID No.: AK 0901-09AA
Final Consistency Response

Dear Mr. Floyd:

The Division of Coastal and Ocean Management (DCOM) has completed coordinating the State's review of your proposed project for consistency with the Alaska Coastal Management Program (ACMP). DCOM has developed the attached final consistency response based on reviewers' comments. This final consistency response, developed under 11 AAC 110, applies to the federal consistency determination required for the activity per 15 CFR 930, Subpart C.


Based on an evaluation of your project by the Alaska Departments of Environmental Conservation, Fish and Game, Natural Resources and the Bristol Bay CRSA, DCOM *concurs* with your determination that the project is consistent with the ACMP and affected coastal district's enforceable policies to the maximum extent practicable.

This is the *final consistency decision* for your project.

This consistency response is only for the project as described. If you propose any changes to the approved project, including its intended use, prior to or during its siting, construction, or operation, you must contact this office immediately to determine if further review and approval of the revised project is necessary.

If you have any questions regarding this process, please contact me at 907-269-7474 or email margie.goatley1@alaska.gov.

Sincerely,



Margie Goatley
Project Review Coordinator

Enclosures

cc:

USACE Regulatory Branch	USACE
Michael Dombkowski	USCG
Phill North	EPA
Gary Voerman	EPA
Sean Palmer	DEC - ANC
Fran Roche	DEC -JNU
Marla Carter	ADFG
Ellen Simpson	ADFG
Jim Bales	ADFG/Habitat
Mike Daigneault	ADFG/Habitat
Dave Gann	DNR/DCOM
Shauna McMahon	DNR/DCOM
Adele Lee	DNR/DMLW/ACMP Liaison
Kellie Westphal,	DNR/DMLW/Water
SHPO	DNR/DPOR/SHPO
Linda Markham	ADOT&PF
Nikos Pastos	Alaska Intertribal Council
Ralph Anderson	Bristol Bay Native Association,
Tom Hawkins	Bristol Bay Native Corporation
Jill Galbraith,	Loussac Library, Anchorage
Andrew DeValpine	Program Director/Coastal Contact
City of Dillingham	
Evan Thoms	

BRISTOL BAY CRSA
Box 849
DILLINGHAM, AK 99576
907. 842. 2666/FAX 907. 842. 2776.
BBCRSANT@NUSHTEL.COM

To: Guy R. McConnell
From: Andrew deValpine, BBCRSA
RE: ER 09-01

January 29, 2008

Mr. McConnell:

The Bristol Bay CRSA has reviewed the U.S. Army Corps of Engineers Environmental Assessment and FONSI regarding the Dillingham bank stabilization project and we have identified some areas that we believe could use further clarification, elaboration or study.

The preferred alternative for the west side does not include hardening of the east side of the inner harbor. The analysis states that the breakwater should sufficiently diminish the wave action within the harbor to the point that the east side would not need additional protection.

The aerial photos show over time that the east side of the inner harbor has been steadily eroding, which effects the stability of the swing arms to which the floats are attached. The EA references two large storms – 1980 and 2005 – and in describing the chosen alternative it appears that the design is driven by these large, but rare events.

These same aerials, though, show the east side erosion in the harbor as having progressed before the 2005 storm and after the date of the first photo (photos 3 and 4, page seven). This suggests that more is at work eating away the bank than large storms. What about the effect of hundreds of boat wakes every summer? Is the conclusion that the breakwater will sufficiently arrest erosion in the mooring basin backed by all pertinent data?

The breakwater will clearly limit wave-action within the mooring basin, but we did not see any mention of what effect this new structure will have on patterns

of sedimentation. Is it possible that sediment will accumulate somewhere in its vicinity that would necessitate additional yearly dredging, which would be an additional cost? The sediment transport and deposition will be changed by this structure, but there is discussion as to whether this poses additional potential problems.

Within the basin, if alternative W2 is employed, the hardened west bank will deflect and accelerate current within the basin. Would that acceleration be sufficient to continue eating away at the east bank?

Finally, within the basin, it is not clear how the west side revetment ends and how the remaining and unprotected shore will be affected by it. Also, there should be some consideration for the effect of a new boat launch to be built into the main part of Scandinavia Creek, west of the bulkhead at the north end of the harbor. This structure and the proposed west bank hardening will likely create new fluid dynamics that may have a more pronounced effect on the unprotected shoreline than is currently being considered.

As for the dock side of the plan, our main area of uncertainty regards the effect of the preferred alternative on the marshy shoreline. It appears this alternative protects the base of the tailings impoundment, but in so doing it leaves a stretch of shoreline vulnerable. If this is as it appears, the incoming tidal current should accelerate down the hardened shoreline and hit the unprotected shoreline with more force and create a new problem area.

More discussion on how this design would or would not contribute to more upstream erosion would be helpful.

Thank you for this opportunity to comment and for all the work you have done on this EA.

Andrew deValpine

Director, Bristol Bay CRSA