

APPENDIX J
AGENCY CORRESPONDENCE

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From: [Galasso-Irish, Cascade E \(DEC\)](#)
To: [Valerie Haragan](#)
Cc: [Brunner, Melinda S \(DEC\)](#)
Subject: GCI ROW Contaminated Site Search Unalaska
Date: Tuesday, January 26, 2021 3:37:58 PM
Attachments: [ROW Lower tank farm and Thermal Treatment Area.PNG](#)
[Lower Tank Farm and MWRP-37.PNG](#)
[Tony's Service Center figure.PNG](#)
[Contaminated Sites ROW route 200 ft.pdf](#)

[EXTERNAL EMAIL - CAUTION: Do not open unexpected attachments or links.]

Dear Valerie,

I have reviewed the area of construction impact you identified in the fiber optic cable route along existing ROWs and easements in Unalaska. Approximately 24 Active Contaminated Sites and one Cleanup Complete with Institutional Controls are within 200 feet of the ROW route provided.

Because the construction will only be taking place in the top 3 ft of soil, the known remaining contamination in these areas is: 1) petroleum in the smear zone or, 2) has been cleaned up to the extent practicable, or 3) is limited to building footprints, it is unlikely the project will encounter contaminated soil above cleanup levels or groundwater. The few sites where, based on a review of past site assessments and sampling reports, it may be possible are:

- Dutch Hbr-Rocky Point Lower Tank, Hazard ID 512. Groundwater in this area is contaminated from fuel spills, and depth to groundwater has historically been recorded in this area between 1.5 to 6 ft bgs. Due to seasonal variation of groundwater (approximately 2.71 ft), it is unknown if groundwater will be encountered at 3 ft at the time of the project activities. Soil impact delineation in 2009 observed subsurface soil contamination exceedances from 6 to 19.2 ft bgs, indicating it would be unlikely for soil exceedances to be found in the smear zone and at the depth of ROW construction activities. The site is approximately 50 ft from the ROW route.
- Dutch Hbr-Rocky Point MWRP-37, Hazard ID 25703. This site is adjacent to the Rocky Point Lower Tank Farm and the same issues apply.
- Tony's Service Center, Hazard ID 23233. Soils in this area are all below ADEC clean up levels, however the neighboring lot (Sitka Spruce Park) identified Diesel contamination in the groundwater, which was recorded at an average depth of 4 ft below ground surface (bgs) and is believed to be attributed to the site as the source area. It is possible the groundwater level fluctuates such that digging to 3' bgs may encounter contaminated groundwater. The site is approximately 50 ft from the ROW route.
- Dutch Hbr-Rocky Point Thermal Treat, Hazard ID 514. Groundwater contamination is present at this site at depths between 3.5 to 10 ft below ground surface. Diesel contamination is present in the soil surface and subsurface, but appears to be contained near the slope to the northeast, away from the ROW route.

Attached are several figures of the sites. Please note the contaminated sites on the ROW route PDF are only the contaminated sites within approximately 200 ft of the ROW route. If the timing of your project is such that contaminated groundwater will be encountered, a contaminated groundwater management plan in accordance with 18 AAC 5.325(i) is required. If construction is expected to require dewatering, an excavation dewatering permit may be required from DEC. See <https://dec.alaska.gov/water/wastewater/stormwater/dewater-hydrostatic/> . Attached is DEC's technical memorandum on "Managing Petroleum-Contaminated Soil, Water or Free Product during Public Utility and Right of Way Construction and Maintenance" dated September 2018 for your use. If during construction the project encounters soil contamination associated with the known sites, please contact me to discuss appropriate management and documentation. If previously unknown contamination unassociated with site is identified during the construction, it must be reported to DEC's Prevention, Preparedness, and Response Program. For more info on spill reporting (including reporting previously unknown historical releases), please visit <http://dec.alaska.gov/spar/ppr/spill-information/reporting/>.

If you would like access to any information on the sites provided, please let me know and we can submit a public records request to provide any materials on contamination and cleanup activities.

Additionally, if the Dutch Harbor excavation project is going to happen all at once such that there is more than an acre of ground disturbed, a Stormwater Pollution Prevention Plan (SWPPP) may be necessary. This information can be found at <https://dec.alaska.gov/water/wastewater/stormwater/forms/#CGP> .

Please let me know if you have questions, and we can coordinate a virtual meeting at your convenience.

Thank you,

Cascade Galasso-Irish
Department of Environmental Conservation
Contaminated Sites Division
Environmental Program Specialist
610 University Ave Fairbanks, AK 99709
907.451.2181 | cascade.galasso-irish@alaska.gov

-----Original Message-----

From: Gray, Andrew A CIV USARMY CEPOA (USA) <Andrew.A.Gray@usace.army.mil>
Sent: Monday, October 28, 2019 10:50 AM
To: Emily Creely <ecreely@dowl.com>; Lucy Flynn O'Quinn <loquinn@dowl.com>; Caity Kennedy <ckennedy@dowl.com>
Subject: FW: [Non-DoD Source] Re: FW: POA-2019-00021, Alutiiq Museum_Invite for Consulting Parties.pdf

The Alutiiq museum would like to be a consulting party.

For everyone's records, I will forward you emails and keep yall apprised of any responses to the consulting party letters.

Andy Gray
Regulatory Division, Alaska District
Kenai Field Office
(907)753-2722

-----Original Message-----

From: Molly Odell [<mailto:molly@alutiiqmuseum.org>]
Sent: Sunday, October 27, 2019 8:36 PM
To: Gray, Andrew A CIV USARMY CEPOA (USA) <Andrew.A.Gray@usace.army.mil>
Cc: Baginski, Kim R CIV USARMY CEIT (US) <Kim.R.Baginski@usace.army.mil>; amy@alutiiqmuseum.org
Subject: [Non-DoD Source] Re: FW: POA-2019-00021, Alutiiq Museum_Invite for Consulting Parties.pdf

Hi Andy,

Thank you for reaching out to the Alutiiq Museum. We are interested in participating in the Section 106 process for the proposed undertaking. I will be the USACE's point of contact at the Alutiiq Museum.

I look forward to hearing more about the project.

Thank you,

Molly Odell
Project Manager & Archaeologist

Alutiiq Museum & Archaeological Repository
p: 844•425•8844 x14 f: 866•335•7767

w: alutiiqmuseum.org <BlockedBlockedBlockedhttp://alutiiqmuseum.org/> e: m
<<mailto:marlise@alutiiqmuseum.org>> olly@alut <<mailto:marlise@alutiiqmuseum.org>> iiqmuseum.org
<<mailto:rosanne@alutiiqmuseum.org>>
Celebrating Alutiiq heritage through living culture.

From: [Bruce Rein](#)
To: [Schaberg, Kevin L \(DFG\)](#); [Emily Creely](#)
Cc: [Frost, William D \(DFG\)](#); [Pring-Ham, Cynthia K \(DFG\)](#); [Sagalkin, Nicholas H \(DFG\)](#); [Wadle, Jeff A \(DFG\)](#); [Marie, Megan E \(DFG\)](#)
Subject: RE: AU-Aleutian Fiber Cable project
Date: Wednesday, April 17, 2019 1:02:55 PM

Kevin,

I will hold on to your contact information to discuss salmon fishing activities along the route once we get closer to installation phase.

The cable itself once installed does not interfere with salmon fishing as the route has been designed well clear of any beach set areas and other salmon fishing methods (seines, trolling and drift net) do not involve bottom contact. Only possible interference is during the short duration a cable installation vessel is on site which can be planned around peak openings in any given area once the project progresses to the installation phase. A cable lay vessel will be at a landing site for 12 to 20 hours to land and test the cable before moving off to next site. The majority of the route is outside the high effort salmon fishing grounds. The installation is currently schedule to happen in 2021.

Bruce
GCI DSA

From: Schaberg, Kevin L (DFG) [mailto:kevin.schaberg@alaska.gov]
Sent: Wednesday, April 17, 2019 10:13 AM
To: Bruce Rein <brein@gci.com>
Cc: Frost, William D (DFG) <william.frost@alaska.gov>; Pring-Ham, Cynthia K (DFG) <cynthia.pringham@alaska.gov>; Sagalkin, Nicholas H (DFG) <nick.sagalkin@alaska.gov>; Wadle, Jeff A (DFG) <jeff.wadle@alaska.gov>; Marie, Megan E (DFG) <megan.marie@alaska.gov>
Subject: AU-Aleutian Fiber Cable project

[EXTERNAL EMAIL - CAUTION: Do not open unexpected attachments or links.]

Bruce,
Will Frost stopped in today and passed your e-mail along. We look forward to speaking with you about salmon fishing activities in the area to avoid conflicts between our operations.

For kelp related questions on locations, maps, or requirements you should contact Cynthia Pring-Ham, Aquatic Farming Coordinator. I have CC'd her here, and her phone number is 907-465-6150.

Thanks,

Kevin Schaberg

Westward Region Finfish Research Supervisor
351 Research Ct.
Kodiak, AK 99615

From: [Schaberg, Kevin L \(DFG\)](#)
To: [Emily Creely](#)
Cc: [Marie, Megan E \(DFG\)](#); [Frost, William D \(DFG\)](#); Andrew.A.Gray@usace.army.mil; [Sagalkin, Nicholas H \(DFG\)](#); [Wadle, Jeff A \(DFG\)](#); [Fox, Elisabeth K C \(DFG\)](#); [Jackson, James V \(DFG\)](#); [Wilburn, Dawn M \(DFG\)](#)
Subject: GCI Fiber Optic Cable Operations on the S. AK Peninsula -ADF&G concern/recommendation
Date: Tuesday, April 16, 2019 12:06:33 PM

Emily,

My name is Kevin Schaberg and I am the regional research supervisor for ADF&G Division of Commercial Fisheries in the Westward region. This region encompasses all areas that are part of the proposed GCI fiber optic cable project. I have also CC'd the specific Area Management Biologists (AMB) for each of the areas of proposed operations.

I am writing to express some concerns about timing of the cable laying operation and commercial fisheries in the 2020 and 2021 seasons. Most of the areas identified for activity, are within areas that active fisheries occur. There is not enough information at this time to say that there will, or won't, be conflicts between the cable operations and fisheries. As you move forward with planning, we think it would be best to have face to face discussions with the AMBs as well as the seafood processors specific to potential affected areas.

We are willing to work with you to accommodate this activity, but there are some times and areas that have limited flexibility as to when and where fisheries may occur. Management of these fisheries is complex and directed by regulation and biologically based policies. By meeting with each AMB it is possible we could come up with a schedule that would result in less mismanagement of the fisheries and provide the GCI services to the proposed communities.

Thank you for your time,

Kevin Schaberg

Westward Region Finfish Research Supervisor
351 Research Ct.
Kodiak, AK 99615
907-486-1873



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

Department of Fish and Game

DIVISION OF HABITAT
Southcentral Region Office

333 Raspberry Road
Anchorage, Alaska
Main: 907.267.2342
Fax: 907.267.2499

April 11, 2019

U.S. Army Corps of Engineers
Attn: Andrew Grey
44669B Sterling Highway
Soldotna, AK 99669

RE: ADF&G comments on POA2019-21

Dear Mr. Grey:

The Alaska Department of Fish and Game (ADF&G) has reviewed your General Permit Agency Coordination (GPAC) concerning the proposed project by GCI Communications that involves laying a fiber optic cable to connect existing infrastructure on Kodiak Island ending in Illuliuk Bay, Unalaska. Connections along the cable route would be made at the communities of Larsen Bay, Chignik, Chignik Lagoon, Chignik Lake, Perryville, Sand Point, King Cove, Cold Bay, False Pass, and Akutan. The applicant proposes to install a fiber optic cable below the Mean High Water mark (MHW) of the Gulf of Alaska, and in adjacent wetlands above the High Tide Line (HTL) at connection points, to provide high speed internet to eleven communities in southwest Alaska. The ADF&G offers the following comments regarding the proposed project. These comments are submitted pursuant to the Fish and Wildlife Coordination Act (48 Stat. 401, as amended: 16 U.S.C. 661 et seq.), and constitute the ADF&G's comments on the referenced public notice.

The GPAC does not indicate when the proposed activities from Kodiak to Unalaska would occur. There are state managed commercial and sport fisheries along the entire length of the proposed activity. Cable installation activities should be planned to avoid interference with these fisheries. A list of fisheries in the project area is included below.

Salmon fisheries occur from about June 1 through September 30 annually throughout the project area. State of Alaska permitted kelp farms are located in Larsen Bay and the Kodiak city areas. These kelp farms operate October through May annually, and infrastructure may be located in marine waters year round. State managed groundfish and shellfish fisheries are located in state waters within 3 miles seaward from shore. These occur October through May annually. Mill Bay is stocked annually with coho salmon and is a popular public fishery from Aug 1 through September 31, annually. ADF&G area management biologists in Kodiak can be contacted more detailed information on timing for each fishery to assist GCI with avoiding and minimizing impacts to fisheries during cable installation.

This project as described does not require a Fish Habitat Permit from the ADF&G, Division of Habitat. Thank you for the opportunity to comment and for considering our recommendations. Please contact Habitat Biologist Will Frost at 267-2813 or william.frost@alaska.gov if you have any questions.

Sincerely,
Ron Benkert



Regional Supervisor
Central Region Office

Email cc:

A. Ott, ADF&G-HAB
J. Alas, ADF&G-HAB
T. Polun, ADF&G-SF
K. Schaberg, ADF&G-CF
J. Jackson, ADF&G-CF
E. Fox, ADF&G-CF
N. Sagalkin, ADF&G-CF
J. Wadle, ADF&G-CF
D. Wilburn, ADF&G-CF
N. Svoboda, ADF&G-WC
C. Larson, ADNR DMLW
H. Brooks, ADNR DMLW
J. Rypkema, ADEC

From: [Emily Creely](#)
To: [Emily Creely](#)
Subject: FW: [EXT] RE: AU aleutian follow up
Date: Tuesday, June 08, 2021 9:47:53 AM

From: Flint, Rena B CIV USARMY CEPOA (USA) <Rena.B.Flint@usace.army.mil>
Sent: Thursday, May 20, 2021 1:48 PM
To: Emily Creely <ecreely@dowl.com>
Subject: [EXT] RE: AU aleutian follow up

WARNING: *External Sender - use caution when clicking links and opening attachments.*

Thank you Emily,

I really appreciate the opportunity to coordinate with you on this project.

Your map looks to intersect many of our active (underway or future) FUDS projects namely: Ballyhoo Spit, Mount Ballyhoo, Margaret Bay-Airport, Unalaska Valley, Pre-WWII Tank Farm, and Range Complex No. 1.

Please find attached some resources for your use:

Range Complex No. 1 Safety Guide

2019 Property Summary

As I said on the phone in 2020, I closed the old property-wide "Dutch Harbor Vicinity" Project by breaking the large project area up into 8 new smaller projects by geographic region: Unalaska Valley, Pyramid Valley and Port Levashef, Summer Bay-Humpy Cove, Margaret Bay-Airport, Museum of the Aleutians, Mount Ballyhoo, Ballyhoo Spit, Little South America.

In 2020, we formed also a Restoration Advisory Board (RAB).

Attached are some outreach materials leading up to the so far 3 RAB meetings hosted.

The hazard evaluation priority for Range Complex No. 1 is 4, where Priority 1 indicates the highest potential hazard and Priority 8 the lowest potential hazard in the program.

Please let me know if I can help further. I am still looking into the "consultation" question.

Thanks,

Rena

Rena B. Flint
Project Manager, FUDS NALEMP
U.S. Army Corps of Engineers

PO Box 6898
2204 Talley Ave, Rm 200
JBER, AK 99506
907-753-2680, 907-201-3108

Introduction

The purpose of this guide is to provide information about the military training activities that took place at the former Amaknak Military Facilities and to raise awareness of the explosive hazards that may exist at the range.

The former Amaknak Military Facilities were used from 1911 to 1952 for a variety of military activities. The site consists of the former Dutch Harbor Naval Operating Base and other facilities on Unalaska and Amaknak Islands. The U.S. Navy first established a communication facility in 1911 and a weather station in 1939. By 1942, the Navy had constructed a port and submarine and seaplane bases. During this same time, the U.S. Army built air and coastal artillery defense sites and support facilities. Most of the former Amaknak Military Facilities were either decommissioned or declared surplus by 1952. An area of the former Amaknak Military Facilities, known as Range Complex No. 1, has been identified through historical research and site visits as having potential explosive hazards. The munitions known or suspected to have been used at the property include medium caliber munitions and small arms ammunition.

Range Complex No. 1 is located on and in the surrounding waters of Unalaska Island in the Aleutian Islands chain of Alaska. The land is publicly and privately owned, and is used for commercial fishing, and residential and industrial purposes.

Because explosive hazards associated with military munitions from past military activities may remain on and in the surrounding waters of Range Complex No. 1, the U.S. Army Corps of Engineers recommends that landowners and visitors follow the **3Rs of Explosives Safety – Recognize, Retreat and Report.**



An example of a medium caliber munition

Former Amaknak Military Facilities

For More Information



US Army Corps of Engineers.

The U.S. Army Corps of Engineers is responsible for identifying, investigating and, when necessary, conducting an appropriate response to address contamination and military munitions resulting from past Department of Defense activities at Formerly Used Defense Sites, also referred to as FUDS.

For information about the former Amaknak Military Facilities, contact the FUDS Information Center by calling the toll-free number 1-855-765-FUDS (3837). For general information about the FUDS Program, visit www.fuds.mil.

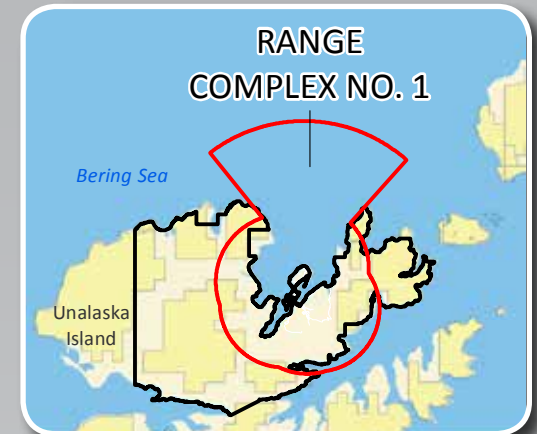
Follow the 3Rs of Explosives Safety



3Rs Safety Guide

Former Amaknak Military Facilities

**Alaska
Aleutians West**



Range Complex No. 1

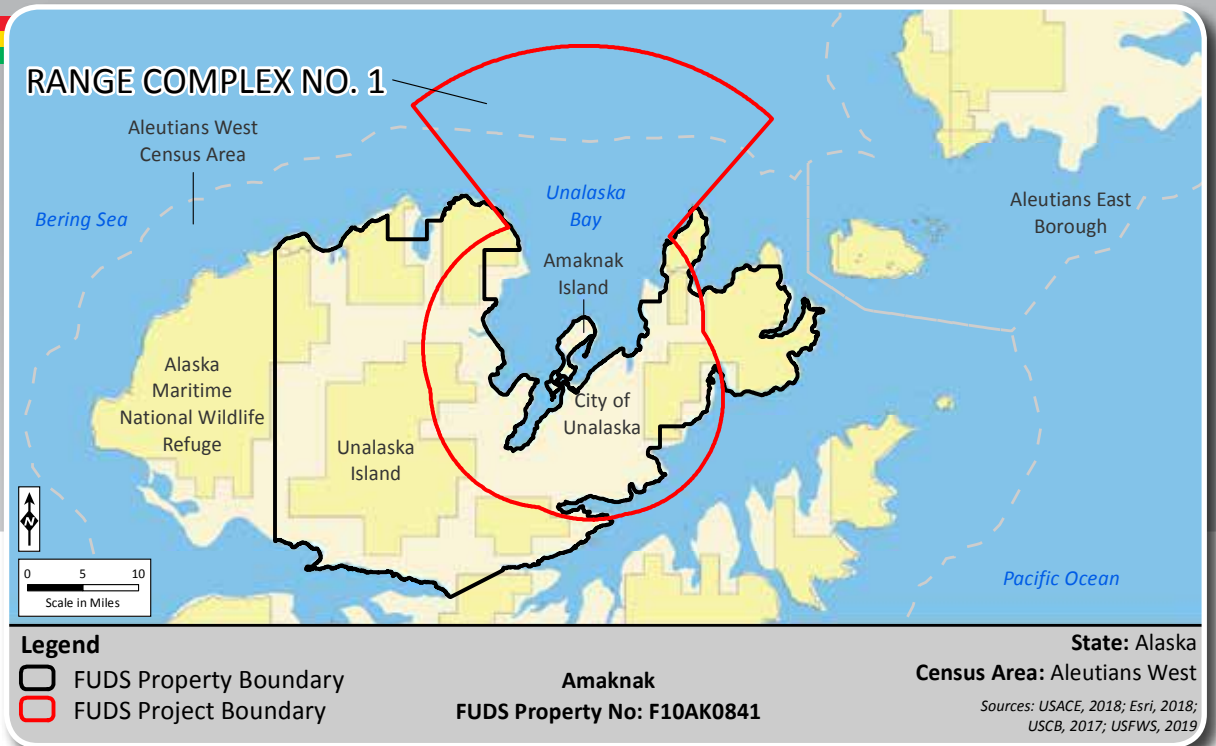


US Army Corps of Engineers.



Source: Library of Congress

Headquarters area of the former Naval Operating Base at Dutch Harbor, Unalaska Island, Alaska



Frequently Asked Questions

Q: What types of potential hazards exist?

A: Military munitions, such as medium caliber munitions and small arms ammunition, were potentially used at the former Amaknak Military Facilities. The U.S. Army Corps of Engineers is unable to rule out the presence of munitions that may pose an explosive hazard.

Q: What do I do if I suspect I may have come across a military munition?

A: If you suspect you may have come across a military munition, the best way to ensure your safety is to follow the 3Rs of Explosives Safety: **R**ecognize – when you may have encountered a munition and that munitions are dangerous; **R**etreat – do not approach, touch, move or disturb it, but carefully leave the area; and **R**eport – call **911** and advise the police of what you saw and where you saw it.

Q: What are the findings of the work that the government has completed?

A: Historical research and site inspections indicate that military munitions were potentially used at these ranges, and some munitions may

remain on the property and in the surrounding waters of Range Complex No. 1. The U.S. Army Corps of Engineers has determined that further investigation is required for Range Complex No. 1 at the former Amaknak Military Facilities.

Q: What will be done next?

A: The U.S. Army Corps of Engineers will make explosives safety education material that is based on the 3Rs available to landowners and the community. Additionally, it will coordinate with landowners as it plans required response activities.

Q: Where can I get more information?

A: For more information, call the Formerly Used Defense Sites Information Center toll-free number 1-855-765-FUDS (3837). Additional information can be found by searching on the property name, Amaknak, in the Geographic Information System tool on the Formerly Used Defense Sites website at www.fuds.mil.

Follow the 3Rs of Explosives Safety

Recognize

when you may have encountered a munition and that munitions are dangerous.

Retreat

do not approach, touch, move or disturb it, but carefully leave the area.

Report

call 911 and advise the police of what you saw and where you saw it.

Archived: Wednesday, September 19, 2018 8:25:00 AM
From: Tencza, Michael G II CIV USARMY CEPOA (US)
Sent: Wednesday, September 12, 2018 2:19:21 PM
To: Emily Creely
Cc: Gray, Andrew A CIV USARMY CEPOA (US)
Subject: RE: GCI Project (AU BLUE)
Sensitivity: Normal

Emily,

Nearly all of these are near a Corps civil works project; however, the marine routes considered 'draft' final will not require a formal Section 408 review from our office. If the scope of the project, marine routes, or landfall locations change from the 'draft' final stage please be sure to coordinate with our office to verify this will not have an impact on one of our projects and trigger a Section 408 review.

My advice would be to avoid any navigation features (ports, harbors, navigation channels) and shoreline protection features. Chances are the Corps had involvement in their construction and therefore would require a formal Section 408 review from our office.

Respectfully,
-Michael
907-753-2648

-----Original Message-----

From: Emily Creely [<mailto:ecreely@dowl.com>]
Sent: Wednesday, September 12, 2018 8:39 AM
To: Tencza, Michael G II CIV USARMY CEPOA (US) <Michael.G.Tencza@usace.army.mil>
Cc: Gray, Andrew A CIV USARMY CEPOA (US) <Andrew.A.Gray@usace.army.mil>
Subject: [Non-DoD Source] RE: GCI Project (AU BLUE)

Thank Michael!
I can do that!

I'm going to use a program called newforma, which allows me to send large (multiple) files and I'll send the obliques through that.
I'm attaching three key shapefiles in GIS as well in this email (Marine route, landfall locations). Right now the marine routes are 'draft' final, which means they are still finalizing a couple of options, so if any of these options are near a Section 408 project, please let me know!

Emily

Emily Creely, PWS
Environmental Specialist

DOWL
907.562.2000 | office
907.865.1216 | direct

-----Original Message-----

From: Tencza, Michael G II CIV USARMY CEPOA (US) <Michael.G.Tencza@usace.army.mil>
Sent: Wednesday, September 12, 2018 8:20 AM
To: Emily Creely <ecreely@dowl.com>

Cc: [Gray, Andrew A CIV USARMY CEPOA \(US\)](#) <Andrew.A.Gray@usace.army.mil>
Subject: RE: GCI Project (AU BLUE)

Emily,

I don't want to create additional work for you but can we do a combination of the two? The oblique of the proposed landfall was helpful. And if you could send either a GIS file or KMZ file of the entire fiber optic cable route for the TERRA-Aleutian South proposed project.

I think we have Civil Works projects in nearly all of those communities. Once I get the information above I can coordinate with you on the proximity to any projects which may require a Section 408 review.

Also, just a heads up that a new policy guidance document on the Section 408 process was issued earlier this week. I'm still trying to review it myself and find all the changes. A copy of the new policy can be found here: Blockedhttps://www.publications.usace.army.mil/Portals/76/Publications/EngineerCirculars/EC_1165-2-220.pdf?ver=2018-09-07-115729-890

Respectfully,
-Michael
907-753-2648

-----Original Message-----

From: Emily Creely [<mailto:ecreely@dowl.com>]
Sent: Tuesday, September 11, 2018 4:51 PM
To: Tencza, Michael G II CIV USARMY CEPOA (US) <Michael.G.Tencza@usace.army.mil>
Cc: Gray, Andrew A CIV USARMY CEPOA (US) <Andrew.A.Gray@usace.army.mil>
Subject: [Non-DoD Source] RE: GCI Project (AU BLUE)

Hi Michael,

DOWL is working again on behalf of GCI for a proposed project(referred to as "TERRA-Aleutian South") to lay approximately 870 miles of fiber optic cable to provide high speed internet (broadband) to eleven communities in southwest Alaska from Kodiak to Unalaska.

Larsen Bay, Chignik, Chignik Lagoon, Chignik Lake, Perryville, Sand Point, King Cove, Cold Bay, False Pass, and Akutan will serve as regeneration sites also receive broadband service.

I wanted to coordinate with you to determine (hopefully) that the project is not adjacent to any Section 408 projects.

There is a couple of ways we can do this:

1. I can provide images of the proposed landfalls and aeriels of routes (I'm attaching an example for Kodiak/Mill Bay Site) 2. I can send you GIS files or KMZ files of the route and lat/long of landings?

Please let me know how you would like to proceed.

Thank you!
Em

Emily Creely, PWS
Environmental Specialist

DOWL
907.562.2000 | office
907.865.1216 | direct

-----Original Message-----

From: Tencza, Michael G II CIV USARMY CEPOA (US) [<mailto:Michael.G.Tencza@usace.army.mil>]
Sent: Friday, September 15, 2017 11:38 AM
To: Creely, Emily
Cc: Gray, Andrew A CIV USARMY CEPOA (US)
Subject: RE: GCI Project (AU BLUE)

Emily,

The 408 request would be coordinated through my office, but please keep Andy in the e-mail loop. I have been looking through some of our historical documentation on the project. We were thinking that perhaps there was a City/State constructed portion of the riverbank protection that you may be able to use for the on-shore location which would not trigger a 408 request through USACE. However, their portion is the multipurpose pipe pile bulkhead system which may not be a feasible onshore tie-in location. The pipe pile bulkhead system also incorporated rock toe protection, but was omitted for about 2/3 of the bulkhead during original construction due to funding limitations. When USACE got involved constructing the stone revetment there is some documentation to suggest we also completed the rock toe protection along the bulkhead. Bottom line is we appear to be headed down a path which will require a 408 request if the proposed onshore tie-in location crosses the riverbank protection features.

We also have a project cooperation agreement with the City of Bethel for the bank stabilization project which states they are solely responsible for operating, maintaining, repairing, replacing, and rehabilitating the completed project. We highly recommend coordinating with the City on the proposed work as having their approval will be a key component to the 408 review.

Attached to this e-mail is our policy and procedural guidance for processing Section 408 requests. It expires on 30 September 2017. I haven't heard anything if they intend to extend this policy or issue something entirely new. Assuming it is extended with no changes, I recommend taking a look at the following (page #s based on the PDF and not the document itself):

-Paragraph 5 starting on page 6 of 73

-Paragraph 6a starting on page 7 of 73

-Paragraph 6p (1) thru (3) starting on page 10 of 73 -Paragraph 7c starting on page 13 of 73

We are basically at step 1 (pre-coordination) for the proposed work. If you want to officially get started with the 408, please submit a written request including all the elements identified in 7c(2)(b) starting on page 14 of 17. The 408 request should be addressed to the District Commander, COL Michael S. Brooks, in the form of a letter and may be sent to me by e-mail instead of mailing a hard copy.

Call me if any questions on the 408 process.

Thanks,
-Michael
907-753-2648

-----Original Message-----

From: Creely, Emily [<mailto:ecreely@dowl.com>]
Sent: Tuesday, September 12, 2017 12:44 PM
To: Tencza, Michael G II CIV USARMY CEPOA (US) <Michael.G.Tencza@usace.army.mil>
Cc: Gray, Andrew A CIV USARMY CEPOA (US) <Andrew.A.Gray@usace.army.mil>
Subject: [EXTERNAL] RE: GCI Project (AU BLUE)

Michael,

It looks like our project will occur in the area between where photos 5/6 and 7 were taken, which is an area of stone revetment. I am attaching another photo(taken from a drone I believe) of the area where the proposed project will come on-shore (BMH is a beach manhole).

According to preliminary plans of the site, engineers state:

- o Care will be required to ensure this erosion protection is not affected by the cable installation.
- o The stub of conduit will be placed to edge of current erosion control material along the river bank.
- o The landfall of the cable will use open trench in river bank to expose the previous buried conduit stub and to provide a safe path for the submarine cable.
- o Once vessel has successfully laid away from the landing site 200 m of articulated split pipe armor will be place on the cable in the and into the river to protect from ice scouring and any future erosion abatement materials that may be added to the river bank in the future.
- o This work will be completed using divers.
- o The trench with the cable and protectors installed will be backed filled with trench spoils with special care to reestablish the bank protection.

Should I coordinate any potential 408 authorization through Andy?

Thank you to both of you,
Emily

Emily Creely , PWS
Environmental Specialist

DOWL
907.562.2000 | office
907.865.1216 | direct

-----Original Message-----

From: Tencza, Michael G II CIV USARMY CEPOA (US) [<mailto:Michael.G.Tencza@usace.army.mil>]
Sent: Tuesday, September 12, 2017 11:37 AM
To: Creely, Emily
Cc: Gray, Andrew A CIV USARMY CEPOA (US)
Subject: RE: GCI Project (AU BLUE)

Emily,

Please reference the attached trip report from our 2016 inspection of the Bethel Bank Stabilization project. It contains a map with the extent of the riverbank protection.

Michael Tencza | Operations Manager
Operations Branch
Engineering and Construction-Operations Division U.S. Army Corps of Engineers, AK District
(907) 753-2648

Our Operations website has information for completed Civil Works projects:
BlockedBlockedBlocked<http://www.poa.usace.army.mil/About/Offices/ConstructionOperations/OperationsBranch.aspx>

-----Original Message-----

From: Creely, Emily [<mailto:ecreely@dowl.com>]
Sent: Tuesday, September 12, 2017 9:35 AM
To: Tencza, Michael G II CIV USARMY CEPOA (US) <Michael.G.Tencza@usace.army.mil>
Subject: [EXTERNAL] RE: GCI Project (AU BLUE)

Hi Michael,
I'm attaching a screen shot from a report that shows where the cable will come ashore. Can you tell me how far this is from your project?
Thanks!
Em

Emily Creely , PWS
Environmental Specialist

DOWL
907.562.2000 | office
907.865.1216 | direct

-----Original Message-----

From: Tencza, Michael G II CIV USARMY CEPOA (US) [<mailto:Michael.G.Tencza@usace.army.mil>]
Sent: Thursday, September 07, 2017 12:11 PM
To: Gray, Andrew A CIV USARMY CEPOA (US); Creely, Emily
Subject: RE: GCI Project (AU BLUE)

Thanks Andy.

I looked at the information this morning and don't have any concerns at this point with the harbors. However, we do have some previously constructed riverbank protection in Bethel which may be a concern with their proposed landing location. We have a team headed out there next week actually to complete an inspection of the riverbank protection. I've shared this information with them. Keep us in the loop moving forward.

Respectfully,

Michael Tencza | Operations Manager
Operations Branch
Engineering and Construction-Operations Division U.S. Army Corps of Engineers, AK District
(907) 753-2648

Our Operations website has information for completed Civil Works projects:
[BlockedBlockedBlockedBlockedhttp://www.poa.usace.army.mil/About/Offices/ConstructionOperations/OperationsBranch.aspx](http://www.poa.usace.army.mil/About/Offices/ConstructionOperations/OperationsBranch.aspx)

-----Original Message-----

From: Gray, Andrew A CIV USARMY CEPOA (US)
Sent: Wednesday, September 06, 2017 3:31 PM
To: Tencza, Michael G II CIV USARMY CEPOA (US) <Michael.G.Tencza@usace.army.mil>; Creely, Emily <ecreely@dowl.com>
Subject: GCI Project (AU BLUE)

Michael,

GCI is moving forward with the next step of the permitting process for their fiber optic line in the Bering Sea. Previously I had sent you some information regarding the Geotechnical aspect of the project. While we have not received a formal application yet, I felt it prudent to include you as early in the process as possible.

I've attached several project documents that have been provided to me so far. I don't have any further detail,

but I will certainly forward you the preconstruction notification when I receive it.

As Emily is the project manager for the applicant, it will probably be much more productive if you ask her specific questions, I just ask that I be copied in on correspondence so I that I know the need/status of any permits required by you.

Thank you,

Andy Gray
Kenai Field Office
907-753-2722

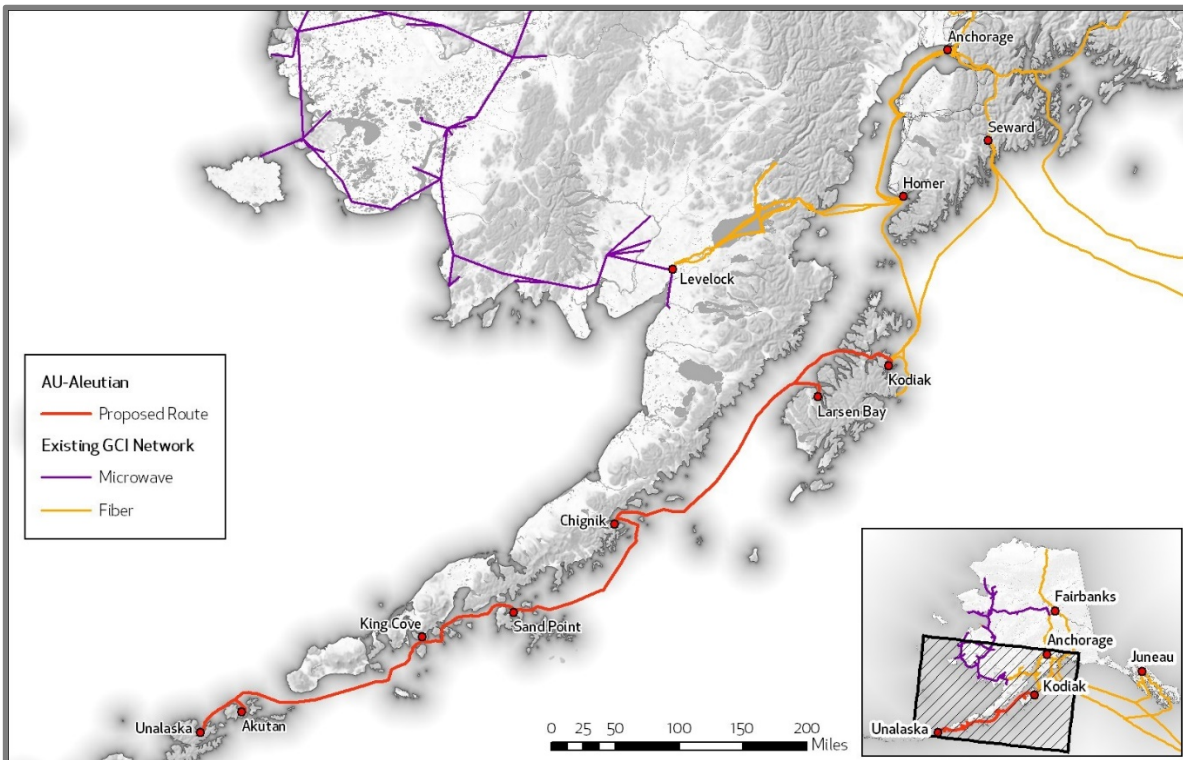
Date: March 3, 2021

North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501-2252

RE: AU-Aleutian Submarine Fiber Optic Cable

Dear Sir / Madam:

GCI is working to build a fiber optic connection to support the people along the Alaskan Peninsula and out to Unalaska, AK. GCI has preformed a route desktop study to identify a probable route for the submarine cable and will undertake a detailed marine survey this year to finalize the route. The desktop study used NMFS data, AIS fishing history tracks, interviews with local fishermen at each landing site, meetings with marine interests at FishCom and Pacific Marine Expo to route the cable to avoid the highest effort fishing areas where possible. In areas where the cable must transit bottom contact fishing grounds the cable will be buried where possible to avoid any impact to the fishing industry in the area.



Please provide any comments or concerns to me at GCI for the quickest response. Ideally any major concerns with current routing should be addressed prior to GCI conducting the marine survey. If needed I can provide larger scale nautical charts that depict the route at a greater detail. Post the marine survey a final route alignment will be available and can be shared later this summer. Once the cable is installed in 2022 GCI will ensure the cable route is published to the industry and included on all nautical charts through NOAA chart office.

GCI wants to continue the over 20-year history of having submarine cables within the Alaska region with no adverse interaction with the fishing industry. Any input from NPFMC will be used to ensure this history continues.

All the Best,

A handwritten signature in black ink, appearing to read "Bruce Rein". The signature is fluid and cursive, with the first name "Bruce" being more prominent than the last name "Rein".

Bruce Rein
GCI Sr. Staff Engineer
907 868 5633
907 229 5920 cell

From: [Emily Creely](#)
To: douglass_cooper@fws.gov; bob_henzey@fws.gov
Cc: [Valerie Haragan](#)
Subject: Proposed Fiber Optic Project in Unalaska
Date: Friday, March 19, 2021 9:41:00 AM

Unicom, Inc. (Unicom), with support from the United States Department of Agriculture (USDA) Rural Development (RD), proposes to deliver 1 Gig internet service to six communities in Southwest Alaska. Specifically, the AU-Aleutian Fiber Project (the project) will involve deploying approximately 848 miles of subsea fiber optic cable from Kodiak to Unalaska. The subsea cable will begin in Mill Bay (Kodiak) and will connect Larsen Bay, Chignik Bay, Sand Point, King Cove, Akutan, and Unalaska. Services to end users are to be provided in these five communities and Unalaska.

An Environmental Assessment is being prepared per USDA guidelines and they state that “if during the planning process, it is determined that a bald or golden eagle might be affected by the proposal, the Agency environmental staff must be contacted so the applicant and Agency can consult, as required, with the USFWS.”

USFWS has published locations of eagle nest locations within Alaska. A review of this data was conducted on February 8, 2021 to identify the nearest nests to the proposed project as listed below:

- Mill Bay: greater than 3,500 feet
- Larsen Bay: approximately 3,000 feet
- Chignik Bay: approximately 2,600 feet
- Sand Point: approximately 20 miles
- King Cove: approximately 20 miles
- Akutan: approximately 7 miles
- Unalaska: approximately 4 within 330 feet

Equipment used to install the terrestrial fiber optic cable would be a rubber wheel backhoe or tracked excavator/backhoe (medium to large excavator required in Unalaska). The trench would be approximately 3-feet wide by 3-feet deep, require minor clearing (grasses and small shrubs), and be adjacent along existing roads that typically are busy with heavy equipment during construction season. Unalaska is the largest fishing port in the United States with several commercial fish processing plants, and thus is a community that experiences significant industrial activity. The project is not anticipated to adversely affect eagle nests or bald eagles as eagles in Unalaska have been habituated to road, industrial, and construction noises.

The nest data was last updated in 2019, but the nests identified in Unalaska were last dated in 2001. This data is seemingly out of date and shows nests located where roads now are built or are in shrubs. Due to a lack of trees, eagles in Unalaska nest on top of buildings/structures or on cliffs, not in shrub tundra.

We would like to know if USFWS has more recent nesting data available in Unalaska.

Thank you,

Emily Creely

Emily Creely, PWS
Environmental Specialist

DOWL

(907) 562-2000 | office
(907) 865-1216 | direct

4041 B Street
Anchorage, AK 99503

www.dowl.com

From: agdb@gci.net
To: [Bruce Rein](#)
Cc: "[Julie Bonney](#)"
Subject: FW: GCI cable charts
Date: Friday, April 30, 2021 9:56:34 AM

[EXTERNAL EMAIL - CAUTION: Do not open unexpected attachments or links.]

Hello Bruce –

We reached out to some of the Kodiak trawl fishermen about the proposed cable route around Kodiak. They do have a couple of questions:

1. Will the cable be buried and if so, how deep?
2. If a vessel snags the cable and is forced to cut off their fishing gear resulting in loss or damage to the gear, would they be compensated?

The attached map shows an area in the Shelikof that is prime flatfish grounds for the fleet (shaded oval). They say a better route would be the purple line inside 3 miles. Is it possible to change the route to this degree?

Other than this flatfish area where trawl bottom gear is used, they say the remainder of the proposed route looks good. Is there any update as to when the marine survey is set to take place?

Thanks, Julie and Katy

From: agdb@gci.net <agdb@gci.net>
Sent: Wednesday, April 28, 2021 9:19 AM
To: agdb@gci.net
Subject: RE: GCI cable charts

Hi Bruce, just wondering when the marine survey is scheduled to start. I see "Spring 2021", do you have more specific date? Thanks, Katy

From: agdb@gci.net <agdb@gci.net>
Sent: Monday, April 5, 2021 9:12 AM
To: 'Bruce Rein' <brein@gci.com>
Cc: 'Julie Bonney (jbonney@gci.net)' <jbonney@gci.net>
Subject: RE: GCI cable charts

Will do, thanks. Good to know about the routes installed on the plotters.

From: Bruce Rein <brein@gci.com>
Sent: Monday, April 5, 2021 8:55 AM
To: agdb@gci.net
Subject: RE: GCI cable charts

From: agdb@gci.net
To: [Bruce Rein](#)
Cc: ["Julie Bonney"](#)
Subject: RE: GCI cable charts
Date: Friday, April 30, 2021 12:47:48 PM

[EXTERNAL EMAIL - CAUTION: Do not open unexpected attachments or links.]

Thanks for the thorough responses, Bruce – very helpful. We will pass this on to the fishermen who have engaged in this issue. Please keep us updated as you see fit and we'll let you know if anything else comes up. -Katy and Julie

From: Bruce Rein <brein@gci.com>
Sent: Friday, April 30, 2021 11:37 AM
To: agdb@gci.net
Cc: 'Julie Bonney' <jbonney@gci.net>
Subject: RE: GCI cable charts

Julie and Katy,

Good questions.

The cable will be buried where we have indication there is bottom contact fishing and the sediments allow for safe burial of the cable. For the most part the entire area around Kodiak has some sort of bottom contact fishing even where it is officially not practiced – gear drops during maneuvers and speed changes or when length of tow is re-adjusted to some degree. To bury cable anywhere it is safe to do so in practice means in sediments like mud, sand and gravel and possibly cobble that are on relatively flat bottom contours less than 15 degree slopes.

Trawl gear if being towed correctly have a very difficult time of catching cables even if they are not buried and lay on the seafloor it is only when board are dropped or dragging in the mud that results in cable entanglement. With all the improvements in trawl gear and skill of the fleet up and down the west coast cable entanglements with trawl gear has now become a very rare occurrence in this region of the world yet there has been many additional cables installed. This is also due in part to the advancements in the ability to lay the cable to conform to the seafloor and to bury the cable. In less advanced fishing fleet areas such as China there remains a huge issue with cable damage due to fishing activities.

The marine survey is designed to not only to look at the seafloor surface but determine the sediment depth and suitability for burial and the burial plan will be determined after that. In some cases like Sand Waves the cable will not be buried but surfaced laid with slack and as the sand is transported the cable becomes buried with possible small exposures in the troughs of the sediment waves. There are other cases like this where it is safer to lay the cable than to attempt to bury the cable. The point here is that it is in GCI's best interest to protect the cable from interaction with any fishing activity and will apply the best methods to do so, but to explain each possibility and what is the best practice would take significant time. It has taken me 30 years in the submarine cable industry.

The laws covering damage to submarine cable are fairly straight forward. Fishermen need to conduct their activities in a prudent manner and not willfully damage the cables. The cable owners must pay for any gear lost if the fisherman is requested to cut away for the safety of the cable and in general GCI will also pay 50% of the loss gear cost in addition to the replacement cost for lost harvest in a case by case basis. The issue comes into play when a fishermen makes a claim after the fact and claims it was the cable. GCI has paid out two claims which where later found to have likely been fraudulent, when GCI inspected the areas of proposed lost gear and found the cable was not disturbed and no evidence of gear. We strongly encourage any fisherman that believes he has caught a cable to call GCI before assuming anything.

The most prudent thing for a fisherman is to remain in a steady state condition when fishing over cables (no abrupt turns, gear recovery, or deployments etc...). We have in the past moved a cable from an area know as a popular end point for shrimp trawls to the middle of the trawl area to accommodate the fishermen' historical patterns and to allow them to cross over the cable in the safest manner possible.

I can't say I am surprised by the area depicted for a re-route. In general the state DNR prefers we go outside the 3 nm state submerged waters as soon as practical and cables in general are safest when deployed perpendicular to slopes (contours). This lead the route to the deeper water offshore in this area. I will discuss with the permitting folks as well as look at the side slopes and see what could be done in this area. There is no perfect route but will see if there is a way to at least avoid this area to a greater degree.

The Marine survey is scheduled to start May 13th in Kodiak area and work its way SW towards Unalaska. The first phase of the survey will last into mid-June. The geotechnical survey will start up in late August. There will be small boat shallow water surveys in between these times.

Thanks Again,

Bruce Rein

GCI | Sr. Staff Engr., Network Services

2550 Denali St., Anchorage, AK 99503

t: 907.868.5633 | cell: 907.229.5920 | w: www.gci.com

From: agdb@gci.net <agdb@gci.net>

Sent: Friday, April 30, 2021 9:56 AM

To: Bruce Rein <brein@gci.com>

Cc: 'Julie Bonney' <jbonney@gci.net>

Subject: FW: GCI cable charts

[EXTERNAL EMAIL - CAUTION: Do not open unexpected attachments or links.]

Hello Bruce –

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From: agdb@gci.net <agdb@gci.net>
Sent: Monday, April 5, 2021 9:12 AM
To: 'Bruce Rein' <brein@gci.com>
Cc: 'Julie Bonney (jbonney@gci.net)' <jbonney@gci.net>
Subject: RE: GCI cable charts

Will do, thanks. Good to know about the routes installed on the plotters.

From: Bruce Rein <brein@gci.com>
Sent: Monday, April 5, 2021 8:55 AM
To: agdb@gci.net
Subject: RE: GCI cable charts

Alaska Groundfish Data Bank

Thanks for reaching out and if there are areas I missed or need more detail please let me know.

GCI will provide final charts as well as installed routes in the software used by most fishermen on

their chart plotters. This has been successful for other GCI cables from Oregon through Alaska. As I discussed with Jake the cable will be buried where there is known bottom trawl fishing and the sediments allow. This allows fishermen to maintain fishing ground without placing the cable at risk.

All the Best,

Bruce Rein

GCI | Sr. Staff Engr., Network Services

2550 Denali St., Anchorage, AK 99503

t: 907.868.5633 | cell: 907.229.5920 | w: www.gci.com

From: agdb@gci.net <agdb@gci.net>

Sent: Monday, April 05, 2021 7:45 AM

To: Bruce Rein <brein@gci.com>

Subject: GCI cable charts

[**EXTERNAL EMAIL** - CAUTION: Do not open unexpected attachments or links.]

Thanks Bruce. I think I got all the files (C1 – C8, plus excel files). Much appreciated. Katy

Alaska Groundfish Data Bank

PO Box 788

Kodiak AK 99615

Office: (907) 486-3033

Fax: (907) 486-3461

agdb@gci.net

From: agdb@gci.net
To: [Bruce Rein](#)
Cc: ["Julie Bonney"](#)
Subject: RE: GCI cable charts
Date: Wednesday, May 19, 2021 8:51:57 AM

[EXTERNAL EMAIL - CAUTION: Do not open unexpected attachments or links.]

Perfect! Thank you much, Bruce. We will let our guys know. -Katy

From: Bruce Rein <brein@gci.com>
Sent: Wednesday, May 19, 2021 8:46 AM
To: agdb@gci.net
Cc: 'Julie Bonney' <jbonney@gci.net>
Subject: RE: GCI cable charts

Hello from the Norseman II,

The survey is proceeding well using the Norseman II as the main survey vessel.

I diverted the route off Uganik Bay to remain within the 3 nm state submerged land limit. See the attached chart.

I am guessing this works for the bottom trawlers since only pelagic trawling is allowed within the 3 nm limit.

All the Best,

Bruce

Alaska Groundfish Data Bank

Thanks for reaching out and if there are areas I missed or need more detail please let me know.

GCI will provide final charts as well as installed routes in the software used by most fishermen on their chart plotters. This has been successful for other GCI cables from Oregon through Alaska. As I discussed with Jake the cable will be buried where there is known bottom trawl fishing and the sediments allow. This allows fishermen to maintain fishing ground without placing the cable at risk.

All the Best,

Bruce Rein

GCI | Sr. Staff Engr., Network Services

2550 Denali St., Anchorage, AK 99503

t: 907.868.5633 | cell: 907.229.5920 | w: www.gci.com

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Sent: Monday, April 05, 2021 7:45 AM

To: Bruce Rein <brein@gci.com>

Subject: GCI cable charts

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Thanks Bruce. I think I got all the files (C1 – C8, plus excel files). Much appreciated. Katy

Alaska Groundfish Data Bank

PO Box 788

Kodiak AK 99615

Office: (907) 486-3033

Fax: (907) 486-3461

agdb@gci.net

From: [Bruce Rein](#)
To: [Valerie Haragan](#); [Sharee Tserlentakis \(Marin\)](#); [Emily Creely](#)
Subject: [EXT] FW: Cable Routing
Date: Tuesday, April 20, 2021 9:24:18 AM

WARNING: External Sender - use caution when clicking links and opening attachments.

Straight from the fisherman's mouth

From: Jake Everich <marlinspikeak@gmail.com>
Sent: Tuesday, April 20, 2021 7:35 AM
To: Bruce Rein <brein@gci.com>
Subject: Re: Cable Routing

[EXTERNAL EMAIL - CAUTION: Do not open unexpected attachments or links.]

Hi Bruce -

Thanks for reaching out.

I supplied the maps of the cable routes to the director of the Alaska Whitefish Trawlers Association, as well as direct dialogue with industry on my part.

Didn't receive any input, after much prodding...

From my end, I'd say you're good to go. Aside from the Northern Shelikof area (Rasberry Island / Uganik), Shelikof is traditionally a largely mid-water trawl gear area. I wouldn't foresee gear contact as being an issue of concern.

Best,

Jake

On Wed, Apr 14, 2021 at 3:32 PM Bruce Rein <brein@gci.com> wrote:

Jake,

Working to finalize my survey plan along the route and it would be a good time to suggest any route changes.

Thanks

bruce

From: Jake Everich <marlinspikeak@gmail.com>

Sent: Thursday, April 01, 2021 8:52 AM

To: Bruce Rein <brein@gci.com>

Subject: Cable Routing

[EXTERNAL EMAIL - CAUTION: Do not open unexpected attachments or links.]

Bruce -

Just a quick note. I've received your screenshots, and plan on taking a look at them in greater detail sometime in the next few days.

Would you mind if I circulated them to members of the Alaska Whitefish Trawlers?

Best,

Jake

--

Marlinspike, LLC

F/V Alaskan

Kodiak, AK

C: 401.742.9187

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Marlinspike, LLC

F/V Alaskan

Kodiak, AK

C: 401.742.9187