

CWA 401 Water Quality Certification Request

version 2.15

(Submission #: HQF-6FR3-HHSE9, version 1)

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Reason: Submission Data
Location: State of Alaska

Details

Site: Robert Storrs Harbor Floats A&B Replacement Project

Submission ID HQF-6FR3-HHSE9

Form Input

Form Instructions

Form Instructions

Instructions for filling out the 401 Prefiling Meeting Request Form are located on the Alaska DEC website at the link below.

[401 Prefiling Meeting Request Form Instructions](#)

Agents: For Delegation of Authority to act on behalf of the applicant in processing the application, use the following form, have signed, and upload with application.

- [Delegation of Authority - 401 Application](#)

Contact Information (1 of 2)

Required Contacts

The following **Contact Roles are REQUIRED**. Please select the appropriate role(s) for each contact and complete the contact details. Multiple role(s) may be assigned to each unique individual.

- **Applicant** (Responsible Party)
- **Billing Contact**

Contact Role(s)

Applicant

Billing Contact

Contact

Prefix

NONE PROVIDED

First Name

Scott

Last Name

Brown

Title

Director

Organization Name

City of Unalaska, Department of Public Works

Phone Type

Number

Extension

Business

907-581-1260

Email

sbrown@unalaska.gov

Mailing Address

P.O. Box 610

Unalaska, AK 99685

United States

Contact Information (2 of 2)

Required Contacts

The following **Contact Roles are REQUIRED**. Please select the appropriate role(s) for each contact and complete the contact details. Multiple role(s) may be assigned to each unique individual.

- **Applicant** (Responsible Party)
- **Billing Contact**

Contact Role(s)

Agent

Consultant

Contact

Prefix

NONE PROVIDED

First Name

Lisa

Last Name

Lee

Title

Environmental Scientist

Organization Name

PND Engineers, Inc.

Phone Type

Number

Extension

Business

907-561-1011

Email

llee@pndengineers.com

Mailing Address

1506 West 36th Ave

Anchorage, AK 99503

United States

Project / Facility Site Info

Identify the applicable federal license or permit

A copy of the federal permit or license application is required to be submitted with the request for the water quality certification. (18 AAC 15.130, 18 AAC 15.180)

Federal Agency

Army Corps of Engineers (USACE)

Permit License Number (ex. USACE: POA-XXXX-XXXX; FERC: FERC-xxxx-xxxx; EPA: AK#####)

POA-2025-00373

Project Name or Title

Robert Storrs Harbor Floats A&B Replacement Project

Primary Receiving Waterbody Name

NONE PROVIDED

Estimated Project Dates (+/- 30 days)

Project Estimated Start Date	Project Estimated End/Completion Date
04/01/2026	04/01/2027

Approximate date(s) when any Discharge(s) may commence (+/- 30 days)

Description	Discharge Estimated Start Date	Discharge Estimated End Date
NONE PROVIDED	NONE PROVIDED	NONE PROVIDED

Project Description (Nature of Activity, include all features)

The proposed improvements include the demolition of the existing A & B Floats, expansion of the shoreline to construct a new parking facility, new pile and float installation, and installation of new utilities. Please see attached project description for further details.

Project Purpose (Describe the reason(s) for discharge)

The City of Unalaska seeks to perform a series of improvements on the Robert Storrs Harbor including demolition of existing moorage structures, installation of new HDPE floats, access upgrades, utility upgrades, and upland parking improvements in an effort to improve accessibility and public safety and to continue to provide public service and vessel mooring for local recreational vessels.

Is any portion of the work already complete?

No

Description of current activity site conditions

The project is positioned within Expedition Inlet in Iliuliuk Harbor, which lies between Captains Bay and Iliuliuk Bay, within Unalaska Bay on the southeast shoreline of Amaknak Island. The project vicinity is within an area of high human use and habitat alteration. The Robert Storrs Harbor consists of 1,232 linear feet of floats, comprised of 71 slips which provide moorage for recreational vessels under 60 feet. Ongoing human activity in the action area that impacts marine mammals includes marine vessel activity, pollution, climate change, noise (e.g., vessels, pile-driving, aircraft, etc.), and coastal development.

Between Dutch Harbor and the head of Iliuliuk Bay, glacial plucking has resulted in a series of steplike ridges. From an aerial view, steep scarps on the south face and smooth dip slopes on the north slope can be observed. Amaknak Island bears evidence of strong glacial sculpturing. Depths at Iliuliuk Harbor can reach up to approximately 25.6 meters but generally range from 10.5 to 24.2 meters.

According to NMFS's ShoreZone mapper, Robert Storrs Harbor has a protected/partially mobile/sediment or rock & sediments and protected/anthropogenic permeable habitat class. The environmental sensitivity index is represented by sheltered scarps in bedrock, mud, or clay. Nearby surveys indicate the presence of green algae and rockweed; however, no eelgrass has been observed at the project location.

Several dive and underwater camera surveys of comparable benthic habitats have been conducted in Unalaska Bay, the surrounding waters of Unalaska Island, and nearby locales. The results from surveys in similar depths indicate a rich benthic index. Harbor bottoms within the vicinity of the Unalaska Marine Center (UMC) Dock in Dutch Harbor and the UniSea G1 Dock in Iliuliuk Harbor were surveyed in 2005 and 2014. The greatest depths of the surveys (50 to 60 feet) predominately hosted anemones, sea stars, sea sponges, and sea urchins in the benthic community. In underwater camera surveys conducted by NOAA in 2012 and 2016 at depths of 150 to 300 feet, local communities were found to be dominated by bottom fish (primarily sculpins, rockfish, and flatfish), sponges, sea stars, sea urchins, and sea pens.

Relevant Site Data, Photographs that Represent Current Site Conditions, or other Relevant Documentation

NONE PROVIDED

Comment

NONE PROVIDED

Is this a linear project? (i.e., utility line, road, etc.)
No

Project Address

[NO STREET ADDRESS SPECIFIED]
[NO CITY SPECIFIED], AK [NO ZIP CODE SPECIFIED]

Visit the link below to help with conversion between DMS and Latitude/Longitude
[DSM - Lat/Long converter](#)

Project Location

53.877960,-166.553545

Visit the following link if you need to convert the lat/long to get the **PLSS information**
[Converter for Section, Township, and Range](#)

PLSS Location (Public Land Survey System)

State Tax Parcel ID	Borough/Municipality	Meridian	Section	Township	Range
NONE PROVIDED	Aleutians West Census Area	Seward	03	073S	118W
NONE PROVIDED	Aleutians West Census Area	Seward	10	073S	118W

Directions to Site

To reach the project site from Tom Madsen/Dutch Harbor Unalaska Airport, begin traveling south towards Airport Beach Road for 0.1 miles. Turn right at the 1st cross street onto Airport Beach Road and travel for 1.4 miles. Turn left onto Gilman Way and travel for 0.2 miles, then turn right onto Pacesetter Way. The project site will be located on the right.

Federal Agency Contact (1 of 1)

Have you been working with anyone in the Federal Agency?
Yes

Federal Contact Role

USACE

Federal Agency Contact

First Name **Last Name**
John Sargent
Title
Regulatory Project Manager, Biologist
Organization Name
USACE
Phone Type **Number** **Extension**
Business 907-347-1801
Email
John.C.Sargent@usace.army.mil

Dredge Material to be Discharged

Is dredging involved?
No

Tier Analysis

A tier analysis is comprised of a layered approach to determine the need for testing the dredge material to aid in generating physical, chemical, toxicity and bioaccumulation information, but not more information than is necessary to make factual determinations. The tier analysis is a series of tiers (I ♦ IV) or levels of intensity (and cost) of investigation. It is necessary to proceed through the

tiers only until information is sufficient to make factual determinations, no further testing is required.

- **Tier I - Site Evaluation and History.** The initial tier (Tier I) uses readily available, existing information (including all previous testing). For certain dredge materials with readily apparent potential for environmental impact (or lack thereof), information collected in Tier I may be sufficient for making factual determinations.
- **Tier II - Chemical Testing** is concerned solely with sediment and water chemistry.
- **Tier III - Biological Testing (bioassay and/or bioaccumulation testing)** is concerned with well-defined, nationally accepted toxicity and bioaccumulation testing procedures.
- **Tier IV - Special Studies** allows for case-specific laboratory and field testing, and is intended to for use in unusual circumstances.

For more information regarding a Tier analysis, see below references

- [EPA Inland Testing Manual](#)
- [USACE Seattle District Civil Works DMMP User Manual](#)

Fill Material to be Discharged

Will Fill Material be Discharged?

Yes

For fill material, identify the material source

previously-authorized, permitted sources

Types of material being discharged and the amount of each type (cubic yards)

Type	Cubic Yards
Armor rock	450.0
Shot rock borrow	2,400.0
Base course	8.0
Utility trench excavation and fill	30.0

Surface area in (acres or linear feet) of wetlands or other waters filled

Surface Area	Units
0.13	Acres

Discharge Location Information (1 of 1)

Identify the location and nature of any potential discharge that may result from the proposed project and the location of receiving waters

Discharge Location ID (001, 002, 003, - increment by one)

001

NOTE: if you have a receiving water that is Wetlands, just enter the generic term "Wetlands". Do not enter "Wetlands of Tanana River", for example.

Please select 'Other' if your waterbody is not in the list below.
You can start typing the name of the waterbody to filter the list.

Receiving Waterbody / Wetlands Name

Iliuliuk Harbor

Discharge Location

53.877960,-166.553545

Other Pollutant Sources

Contaminated Site Information

Determine if your project is **within 1,500 feet** of a known Alaska DEC Contaminated Site. See the *Alaska DEC Contaminated Web Map* below. This will help you to identify if any potential pollutants/parameters of concern may be present on your project site., see DEC's website:

- [Contaminated Sites Web Map](#)
- [Contaminated Sites Database Search website](#)

Is the project within 1,500 feet of a known contaminated site?

No

Parameters of Concern that may be present in discharge

Parameter(s) of Concern

Identify the parameters of concern that may be present in your discharge from the dredge and/or fill material.

Note, **TURBIDITY** and **SEDIMENT** are routine parameters associated with dredge and/or fill activities.

Consider if other parameters may be present from past activities in the area such as contaminated site data, impaired waters or other relevant water quality data, or other parameters of concern identified during the application process.

Parameter(s)


Sediment

Turbidity

If known, describe respective concentrations, persistence, and potential impacts to the receiving water and data on parameters that may alter the effects of the discharge to the receiving water

The project was designed to have the least amount of fill possible to meet its purpose. Fill being placed for the installation of utilities will be clean fill with relatively few fines, which will limit sedimentation. The contractors will comply with local, state, and federal water quality standards.

Impaired Waters

An **impaired waterbody** are those listed as a **Category 4 [304(b)]** or **Category 5 [303(d)]** in the current EPA approved  *Alaska's Integrated Water Quality Monitoring and Assessment Report*.

For the most recently *Approved Integrated Water Quality Monitoring And Assessment Report (Integrated Report)*, see DEC's website:

- [Integrated Water Quality Monitoring And Assessment Report https://dec.alaska.gov/water/water-quality/integrated-report](https://dec.alaska.gov/water/water-quality/integrated-report)

Does a discharge of any parameter identified above occur to an impaired waterbody?

Yes

What parameters are causing the Category 4 or 5 impairment?

Petroleum hydrocarbons

Are any of the above parameters causing the impairment present in the proposed discharge?

No

If determined necessary and requested by the Department, submit sufficient and credible baseline water quality information for the receiving water which meets the requirements of 18 AAC 70.016(a)(6)(A-C).

Avoidance & Minimization BMPs and Mitigation Measures

Describe how impacts are being avoided and minimized on the project site. Include best management practices (BMPs) for sediment and erosion controls that will be implemented to minimize environmental impacts, and any methods and means proposed to monitor the discharge and the equipment or measures planned to treat, control, or manage the discharge.

Include a description of any methods and means proposed to monitor the discharge and the equipment or measures planned to treat, control, or manage the discharge

The following best management practices (BMPs) will be incorporated by the applicant in order to minimize impacts to waters of the U.S.:

1. COU and its contractors will comply with the USACE and Alaska Department of Environmental Conservation (ADEC) permits that will be required for impacts to wetlands and waters of the U.S. under Sections 404 and 401 of the CWA and Section 10 of the RHA.
2. Oil booms will be readily available for containment should any releases occur.
3. All hazardous materials and debris will be stored above the high tide line (HTL) and secured to prevent being blown offshore.
4. All chemicals and petroleum products will be properly stored to prevent spills. Petroleum products, cement, chemicals, or other deleterious materials will not be allowed to enter surface waters.
5. Fueling and vehicle maintenance will not occur within 100 feet of water bodies and wetlands.
6. The contractor will check for leaks regularly on any equipment, hoses, and fuel storage that occur at the project site.
7. If unanticipated cultural, tribal, or archeological resources are discovered during the project, work in the vicinity will stop until the resources can be evaluated by qualified personnel and appropriate consultations held, including with the Alaska SHPO.

Avoidance Measures

Impacts to waters of the United States (WOTUS) could not be entirely avoided for this project because the nature of the project is dependent on maritime access.

Minimization Measures

The project was designed to have the least amount of fill possible to meet its purpose. Fill being placed for the installation of utilities will be clean fill with relatively few fines, which will limit sedimentation. The contractors will comply with local, state, and federal water quality standards.

The incorporation of the proposed BMPs and mitigation measures will minimize impacts to WOTUS to the extent possible. The BMPs can be found in the project description which is included in the USACE permit application.

Mitigation Measures

The project will result in a small loss of WOTUS; however, the renovation of the existing float dock does not impact any unique habitats, and the project is being constructed in a previously disturbed area. The project is intended to extend the life of the existing facility which is important to the community of Unalaska. As such, no compensatory mitigation is proposed.

Social / Economic Importance

Social or Economic Importance

(18 AAC 70.016(c)(5): Provide information that demonstrates the accommodation of important social or economic development. The applicant shall complete either a social OR economic importance analysis (or both) for each affected community in the area

where the receiving water for the proposed discharge is located.

Social Importance Analysis

- Infrastructure improvements
- Community services provided
- Recreational opportunities
- Public health or safety improvements

Economic Importance Analysis

- Commercial activities
- Access to recourses
- Access to a transportation network

Describe Social and/or Economic Importance of the project

Unalaska is home to the number one fishing port in the nation, including three industrial docks and two boat harbors. However, Robert Storrs Harbor is the only existing harbor to be designated for local recreational vessels. The city’s maritime industry is a critical part of the local community and is currently being impacted by the failure of the harbor’s infrastructure.

The existing harbor systems are failing beyond what can be permanently repaired, including corroded concrete, broken and spalled float units, worn hinge connections, degraded structural timbers, and failing electrical and water systems. The proposed project will demolish and upgrade the existing harbor to improve safety and access for the local community.

Description of Social or Economic Importance, if needed

NONE PROVIDED
Comment
NONE PROVIDED

List of Other Permits or Certificates

*Would include but is not restricted to zoning, building, and flood plain permits.

Include a list of all other federal, interstate, tribal, state, territorial, or local agency authorizations required for the proposed project, including all approvals or denials already received.

Agency	Type of Approval*	Identification Number	Date Applied	Date Approved	Date Denied
NMFS	Incidental Harassment Authorization	NONE PROVIDED	06/25/2025	NONE PROVIDED	NONE PROVIDED
USFWS	Incidental Harassment Authorization	NONE PROVIDED	06/25/2025	NONE PROVIDED	NONE PROVIDED
USACE	Individual Permit - 404 CWA	NONE PROVIDED	07/08/2025	NONE PROVIDED	NONE PROVIDED
USFWS	Eagle Take Permit	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED

Other Agency or Local Contacts (1 of 1)

Contact Role

OTHER_REG_CNTCT

Other Agency and or Local Contacts

First Name Last Name
Jennifer Gatzke

Title
Fishery Biologist

Organization Name
NMFS Office of Protected Resources

Phone Type Number Extension
Business 301-427-8401

Email
jennifer.gatzke@noaa.gov

Attachments

Copy of Federal Application (USACE, EPA, or FERC, etc.)

242061_RSH USACE Permit app 20250707.pdf - 08/28/2025 01:58 PM

Comment

NONE PROVIDED

Figures and/or Drawings/Plan Sets. To include a map or diagram of the proposed activity site, including the proposed activity boundaries in relation to local streets, roads, and highways.

242061_Permit Drawings_053125.pdf - 08/28/2025 01:58 PM

Comment

NONE PROVIDED

Document Attachments

NONE PROVIDED

Comment

NONE PROVIDED

Delegation of Authority for Submission of Application

signature of authority A & B Replacement.pdf - 08/28/2025 01:58 PM

Comment

NONE PROVIDED

As per 18 AAC 15.030 signing of applications, all permit or approval applications must be signed as follows:

- 1) in the case of corporations, by a principal executive officer of at least the level of vice president or his duly authorized representative, if the representative is responsible for the overall management of the project or operation;
- 2) in the case of a partnership, by a general partner;
- 3) in the case of a sole proprietorship, by the proprietor; and
- 4) in the case of a municipal, state, federal or other public facility, by either a principal executive officer, ranking elected official, or other duly authorized employee.

The project proponent hereby certifies that all information contained herein is true, accurate, and complete to the best of my knowledge and belief. The project proponent hereby requests that the certifying authority review and take action on this CWA 401 certification request within the applicable reasonable period of time.

Agreements and Signature(s)

As per 18 AAC 15.030 signing of applications, all permit or approval applications must be signed as follows:

- 1) in the case of corporations, by a principal executive officer of at least the level of vice president or his duly authorized representative, if the representative is responsible for the overall management of the project or operation;*
 - 2) in the case of a partnership, by a general partner;*
 - 3) in the case of a sole proprietorship, by the proprietor; and*
 - 4) in the case of a municipal, state, federal or other public facility, by either a principal executive officer, ranking elected official, or other duly authorized employee.*
- The project proponent hereby certifies that all information contained herein is true, accurate, and complete to the best of my knowledge and belief. The project proponent hereby requests that the certifying authority review and take action on this CWA 401 certification request within the applicable reasonable period of time.*

Signed
By llee@pndengineers.com llee@pndengineers.com on 09/12/2025 at 3:33 PM