CWA 401 Water Quality Certification Request

version 2.16

(Submission #: HQG-YAS9-Y70T2, version 2)

Details

Site: Elden loop Development

Submission ID HQG-YAS9-Y70T2

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
Owner
Billing Contact

Contact

Prefix
Mr.

First Name	Last Name
Wayne	Sharp

Title
President

Organization Name
Elden Loop Development, LLC

Phone Type	Number	Extension
Business	206-931-7745	

Email
Wayne.Sharp@jw-residential.com

Mailing Address

10831 100th Street NE

Lake Stevens, WA 98258

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
Application Preparer

Contact

Prefix
Mr.

First Name	Last Name
Zach	Huff

Title
NEPA Specialist

Organization Name
ABR, Inc.--Environmental Research & Services

Phone Type	Number	Extension
Mobile	907-764-4941	

Email
zhuff@abrinc.com

Mailing Address

1225 E. International Airport Road, Suite 110

Anchorage, AK 99518

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-2024-00092

Project Name or Title
Elden loop Development

Primary Receiving Waterbody Name
Tongass Narrow (West Channel)

Estimated Project Dates (+/- 30 days)

Project Estimated Start Date	Project Estimated End/Completion Date
02/02/2026	12/31/2026

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

Description	Discharge Estimated Start Date	Discharge Estimated End Date
Begin road, homesite, boat launch, and dockconstruction	04/01/2026	12/31/2026

Project Description (Nature of Activity, include all features)
The applicant proposes to discharge 26,107 cubic yards of shot rock, gravel, and riprap material into 2.79 acres of waters of the U.S. in order to construct ten (10) new gravel house pads, two access roads, a community boat launch parking lot, and associated utilities for the Elden Loop Subdivision. The applicant also proposes to construct a boat launch ramp, a fixed dock, and three breakwaters in and above the Tongass Narrows mean high-water mark.

Specifically, the proposed project would discharge 14,078 cubic yards of shot rock, gravel, and riprap material into 1.22 acres of wetlands for the construction of access roads. One 24-foot-wide by 1,980-foot-long gravel access road would extend north from the existing Gravina Highway. The roadway would be narrowed to 12-foot-wide for the final 800 feet for use as a utility access trail. A turnaround area and gate would be constructed where the utility trail would start. The utility access trail would include a single 24-foot-wide by 60-foot-long bridge spanning an unnamed anadromous stream. Another 24-foot-wide by 1,100-foot-long gravel road would serve the subdivision road. One (1) 24-foot-wide by 60-foot-long bridge and one (1) 24-foot-wide by 50-foot-long skewed bridge would be constructed to cross an unnamed anadromous stream along the subdivision road. The bridges and supporting embankments would be constructed outside the stream channel and above the ordinary high-water mark (OHWM), though approximately 20 cubic yards of riprap may be placed below OHWM for embankment protection.

The house gravel pads would require placing 12,742 cubic yards of shot rock and gravel material in 1.43 acres of palustrine forested and scrub-shrub wetlands. Ten (10) new gravel pads (approximately 15,000 to 19,000 square feet each) would be constructed for single family residences, including driveways and space required to install associated on-site utilities. Each gravel driveway would include an 18-inch culvert. Block 1, lot 6 has a pre-existing single residence structure installed on pilings. A 30-foot by 50-foot driveway and 30-foot by 40-foot utility pad would be constructed to access the existing house.

A boat ramp, associated turnaround, and parking lot would be constructed near the southeast corner of the project area. The boat launch and parking area would require 1,155 cubic yards of shot rock, 61 cubic yards of gravel, and 164 cubic yards of concrete planks would be discharged into 0.12 acres of wetlands. The boat launch structure would be a 170-foot-long by 26-foot-wide ramp constructed from 85 precast concrete planks (26-feet-long by 2-feet-wide by 1-foot-deep) that would extend into the Tongass Narrows (-6.5 feet mean lower low water [MLLW]). Site preparation to place the pre-cast planks would involve using a tracked excavator at low tide. Also, 323 cubic yards of riprap (wave attenuation boulders) would be placed into 225-feet by 16-feet area below the high tide line (0.015-acre of the Tongass Narrows [+15 MLLW to -4 feet MLLW]) parallel to the boat launch.

Six (6) existing 16-inch steel piles would be removed using a barge mounted crane with a vibratory hammer. The existing steel piles would be reused to support construction of the new proposed floating dock facilities. A total of twelve (12) 16-inch piles would be used to support the boat launch, walkway, and dock. Piles would be installed from a construction barge using a crane-mounted vibratory hammer. Some piles would require rock sockets, which would be drilled using a large-diameter rock drill from the construction barge. A 260-foot-long by 12-footwide floating boat launch would be constructed parallel to the boat ramp and connect to the boat dock. A 12-foot-wide by 200-foot-long floating boat dock would be placed perpendicular to the boat launce with seven (7) designated parking bays, holding up to fourteen (14) boats total. Additional boat and seaplane parking would be available on the north side of the dock.

A 3-foot by 130-foot steel pipe double tube floating breakwater would be installed parallel to the floating boat launch. The double tube float would be anchored in placed with three (3) 25,000-pound concrete blocks. Two (2) 3-foot by 130-foot steel pipe float tube breakwaters would be installed parallel to the dock. The two (2) breakwaters would be connected with 7-feet by 12-inch diameter galvanized steel tubes. The single tube floats would be anchored using three (3) 25,000-pound concrete blocks. All three breakwaters would be used to reduce wave action and turbulence.

Construction for the subdivision would begin in April-May 2026 and anticipated to be completed in June 2026. All in water work is anticipated to begin in April 2026 and end in July 2026. Pile installation would be completed May 2026.

Project Purpose (Describe the reason(s) for discharge)
The Project's purpose is to construct the infrastructure necessary to build a housing subdivision with new residential home sites in the Ketchikan area. This project will construct the necessary road access and home site pads on individual lots so private, single-family residences can be constructed, as well as recreational amenities for homeowners. The Ketchikan Gateway Borough (KGB) does not have an adequate supply of homes to meet current needs or projected future needs. The KGB Assembly have been actively working to identify and address housing issues in the community since February 2020. KGB administrative actions and code amendments that have been taken to increase housing opportunities can be found at: https://www.borough.ketchikan.ak.us/1052/Housing.

Is any portion of the work already complete?
Yes

Please describe the completed work
On Block 1, Lot 6, there is an existing, partially constructed residence (see Photos 1 and 2, below). This homesite was constructed by the previous property owners in uplands. At the time the applicant's acquired the property, the homesite was partially constructed but exposed to the elements. The current property owners "closed in" the structure to prevent environmental degradation, but no further work at this site has been conducted.
Examination of the existing disturbance suggests the previous owners did not import fill material for the homesite but instead cleared the vegetation and underlying organic soils away, and then graded the existing soils to provide a level surface to construct the home's foundation. No additional ground disturbing activities been conducted by the applicant.

Description of current activity site conditions
There is no current activity at the subject site.

Relevant Site Data, Photographs that Represent Current Site Conditions, or other Relevant Documentation
Elden Loop_Project Description_To DEC_2026-01-12.pdf - 01/12/2026 05:21 PM
Comment
Summarized and detailed project descriptions, including wetland fill acres, volume, and type

Is this a linear project? (i.e., utility line, road, etc.)
Yes

Linear Feet
3.100

Project Address
South end of Gravina Island Highway (north side of road)
Gravina Island
Ketchikan, AK 99901

Visit the link below to help with conversion between DMS and Latitude/Longitude
DSM - Lat/Long converter

Project Location
55.31766,-131.6522

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	Ketchikan Gateway Borough	Copper River	31	75S	91E
NONE PROVIDED	Ketchikan Gateway Borough	Copper River	6	76S	91E

Directions to Site
From the Ketchikan Airport (located on Gravina Island), head south on the Gravina Island Highway until it ends at a cul-de-sac. The project is located on the north side of the highway at this location.

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 Hayley **Last Name** Farrer

Title
Project Manager

Organization Name
U.S. Army Corps of Engineers, Alaska District

Phone Type	Number	Extension
Business	907-753-2778	

Email
Hayley.M.Farrer@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 accepte 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
Commercial supplier

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

Type	Cubic Yards
Shot rock	24.078
Gravel	1.769
Riprap	583.0
Concrete planks	164.0
Concrete blocks	37.0

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

Surface Area	Units
2.7908	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
Tongass Narrows

Discharge Location
55.31766,-131.65222

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 contamianted site data, impaired waters or other relevant water quality data, or other parameters of concern identified during the application process.

Parameter(s)
Turbidity
Sediment

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
Not applicable

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

Does a discharge of any parameter identified above occur to an impaired waterbody?
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
All fill material (shot rock, gravel, riprap, concrete) will come from a commercial source.

The project will develop a Stormwater Pollution Prevention Plan (SWPPP) prior to the start of construction. The SWPPP will describe the specific BMPs to be used, which will likely include the use of silt fencing, straw wattles, jute matting, and facing exposed muddy or peat slopes with clean rock. Following project construction, exposed muddy or peat soils can be faced with clean rock or seeded with a native grass mixture. The final selection of BMPs will be dependent on the slope of soil banks and their proximity to streams. BMPs selected for use will be certified weed free under both the Alaska Department of Transportation and Public Facilities and the Alaska Department of Natural Resources standards.

Avoidance Measures
Given the nature of southeast Alaska and the temperate rainforest of Ketchikan, Alaska, it would be difficult to completely avoid impacting wetlands. The Applicant contracted with ABR, Inc. to complete a wetland delineation in 2023, which was used to help inform engineering design. However, only 4.8 acres of the 19.0-acre delineated study area is comprised of uplands and complete avoidance of wetlands is not possible.

The Project design has been updated to avoid impacts to the unnamed stream by removing an entire previously proposed home site fronting Tongass Narrows.

Minimization Measures
Efforts were made to mitigate impacts to wetlands and waters by providing only the necessary fill to construct the access road, subdivision road, residential driveways, residential home sites, and boat launch facilities. Specific minimization measures include:
- The access road (Stensland Avenue) was narrowed at its second intersection with Elden Loop, as this portion of the roadway is only required to support utility construction access.
- Gravel house pads have been designed to be in uplands, where feasible.
- The gravel house pads and driveways were designed to accommodate the anticipated home footprints and utilities each home site will require (e.g., septic system, cistern).
- Project design has been updated to remove one homesite that would have impacted the unnamed anadromous stream.
- The Project will install three prefabricated bridges for each of the crossings of the unnamed anadromous stream. The bridges will be installed without piers or piles placed below the ordinary high-water mark to ensure fish passage is maintained while minimizing the stream crossing's footprint.
- The proposed breakwater would be constructed from individual large riprap placements (versus constructing a solid linear feature).
- The project proposes including three tubular, floating breakwaters to help with wave attenuation at the dock and boat launch (versus constructing additional breakwater from riprap).

Mitigation Measures
The Applicant has a preliminary agreement with Trillium Mitigation Bank (POA-2013-00395) to purchase compensatory mitigation credits for the unavoidable fill of Waters of the U.S., including wetlands.

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

Economic Importance Analysis
NONE PROVIDED

Describe Social and/or Economic Importance of the project
The project would create 10 new homes in Ketchikan, Alaska, a community with a noted shortage in housing supply.

The Ketchikan Gateway Borough (KGB) Assembly has been actively working to identify and address housing issues within the community for the past several years. The existing occupied housing stock in Ketchikan (approximately 6,380 units) is comprised of single-family structures (61 percent), multi-family units (36 percent), and other housing (e.g., mobile home, boat) account for the remainder (McDowell Group 2019). Like many southeast Alaska communities, Ketchikan experiences a substantial seasonal fluctuation in rental unit availability driven largely by the visitor and seafood industries that results in a shortage of available rental units (McDowell Group 2019).
As part of this effort, the KGB Assembly has passed a variety of code amendments and executed administrative actions to reduce development barriers and increase the opportunity for residents to obtain housing . These efforts have included developing agreements with State of Alaska and local agencies and nonprofits (e.g., RuRAL CAP, Denali Commission), and even subdividing KGB property to develop a new residential subdivision along the North Tongass Highway. KGB notes that one of the critical avenues to developing new housing is working with developers to help defer or subsidize some of the costs associated with constructing new developments, of which builders have cited the costs of road and utility construction as being impediments to new projects.
The KGB Assembly has ordered multiple housing studies in recent years:
• The Ketchikan Comprehensive Housing Assessment Project, produced by McDowell Group (2019), examined the available housing and demand in the community. This study assessed the available housing stocks and needs within the community, as well as identified and cataloged existing challenges to developing new housing. While some of the challenges are universal across Alaska and other remote communities (e.g., the cost of materials and associated freight), the study also identified community-specific challenges such as •a lack of easily accessible land and costly road construction to access available land; and steep grades and muskeg that make construction challenging in many areas.•
• The Ketchikan Housing Survey (McKinley 2021) provides an overview of existing housing stocks and new housing desires in the community. Approximately 86% of self-identified new home seekers (or will be future home seekers) as preferring a stand-along single-family house. While the most desired locations are in Ketchikan (North or South Tongass, within city limits), approximately 22 percent of residents would be interested in new housing on Gravina Island.

In its most recent public presentation on housing, the KGB Assembly described its ongoing efforts to improve the available supply of housing in the community. This includes working to develop a new subdivision (Mile 17, Tongass Highway), planning for construction of 8 new units in Saxman, and identifying future expenditures for their Housing Capital Fund.

Description of Social or Economic Importance, if needed
Elden Loop_Alternatives Analysis_Draft_2025-01-20.docx - 11/07/2025 02:35 PM
Comment
The Elden Loop Alternatives Analysis was prepared for the U.S. Army Corps of Engineers as part of the project's permitting efforts.

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
Ketchikan Gateway Borough (KGB)	Tidelands Transfer	Resolution Number 2963	*NONE PROVIDED*	10/17/2022	*NONE PROVIDED*
KGB	Permit to Work on Borough's Public Places	Not applicable	*NONE PROVIDED*	*NONE PROVIDED*	*NONE PROVIDED*
KGB	Zoning permit	Permit Number 11278	05/02/2023	05/19/2023	*NONE PROVIDED*
KGB	Resolution to approve plat, ROW	Resolution Number 4428 A	*NONE PROVIDED*	06/13/2023	*NONE PROVIDED*
U.S. Army Corps of Engineers	Section 404 Permit	POA-2024-00092	07/30/2024	*NONE PROVIDED*	*NONE PROVIDED*
Alaska Department of Fish and Game	Title 16 Fish Habitat Permit	Not applicable	*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**
Hayley Farrer

Title
Project Manager

Organization Name
U.S. Army Corps of Engineers, Alaska District

Phone Type **Number** **Extension**
Business 907-753-2778

Email
Hayley.M.Farrer@usace.army.mil

Attachments

Copy of Federal Application (USACE, EPA, or FERC, etc.)
05 POA-2024-00092_404-Permit App_Supplemental Info_2025-10-24.pdf - 11/07/2025 02:35 PM
04 POA-2024-00092_404-Permit App Form_2025-10-24_Signed.pdf - 11/07/2025 02:35 PM
Comment
After USACE published the project's Public Notice, the application was revised to reflect design changes made in response to public comments.

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.
02 POA-2024-0092_Eng Design Drawings_2025-10-23.pdf - 11/07/2025 02:35 PM
Map1_Gravina_Island_Study Area_2025-11-10.pdf - 01/12/2026 05:29 PM
Map2_Gravina_Island_Wetlands_2025-11-10.pdf - 01/12/2026 05:30 PM
Map3_Gravina_Island_Wetlands_2025-11-10.pdf - 01/12/2026 05:30 PM
Map4_Gravina_Island_Wetlands_2025-11-10.pdf - 01/12/2026 05:30 PM
Map5_Gravina_Island_Wetlands_2025-11-10.pdf - 01/12/2026 05:30 PM
Comment
Engineering drawings and USACE Section 404 permit application maps.

Document Attachments
NONE PROVIDED
Comment
Not applicable

Delegation of Authority for Submission of Application

DEC_Delegation-of-Authority-401-Application_2025-11-03_Signed.pdf - 11/07/2025 02:35 PM

Comment

Delegation of authority attached.

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.

Revisions

Revision	Revision Date	Revision By
Revision 1	11/7/2025 2:35 PM	ZACHARY HUFF
Revision 2	1/12/2026 5:16 PM	ZACHARY HUFF

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 ZACHARY HUFF on 01/12/2026 at 5:31 PM