

APPENDIX J
Agency Correspondence

PROJECT:	AUII Fiber Project	DATE:	September 27, 2023
PROJECT NUMBER:	DOWL 63494	TIME:	10 am
ORGANIZER:	Emily Creely	SUBJECT:	Progress Meeting

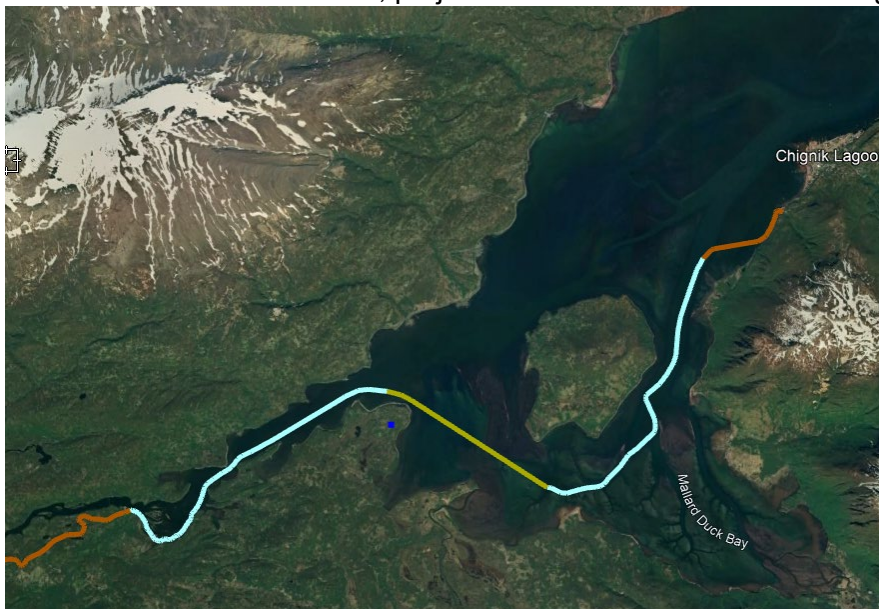
Attendees: Jeanette Alas, Tyler Polum, Carl Burnside (ADF&G); Cameron, Sharee, Nathan Mennen (GCI), Emily Creely and Josh Grabel (DOWL)

1. Intros

- Jeanette Alas: conducts permitting for this part of the state; she appreciates early coordination
- Tyler Polum: Kodiak/Aleutians – sport fisheries
- Carl Burnside: Chignik area management/biologist

2. Current Route

- Route was discussed; project route selection is still occurring



3. Discussion

- ADF&G:
 - Even area within 300 feet of landings has spawning habitat
 - No issue with laying it down
 - A lot of this is very shallow with a lot of boat traffic
 - Not uncommon for folks to hit bottom
 - What is the timeline? We may be encountering fishing at that time
 - Impacts to spawning is more important than impacts to individual fish
 - The other is whether or not boats would be affected by the boat in the area
 - Which vessel would be used and how long would it take?
 - When cable is landing – can we prioritize tiny windows for laying in the window
 - It's tidally dependent - boats could beach/skiff damage cable
 - When thinking of fish habitat it would be tough

- Are these a month or a few days?
- If we are outside window then it comes down to how we are going to impact fish in that area
- GCI:
 - Sharee said it's 2 weeks and it may not have to be in order.
 - Trenching is the thing we should do first thing in June so it's prioritized to have least impacts possible
 - Let's prioritize king spawning habitat.
 - Where is low tide of river? Curious about spatial extent of river
 - The mouth is Hume Point; everything above that at low tide they can't go up
- ADF&G:
 - This is a hot button topic – worst runs
 - Laying cable down the river; mitigate around most sensitive habitat
 - Smolt/fry are there; Kings use deep holes before spawn. They prefer larger gravel and flows...it's a mixed bag of habitat. That's why they like it.
 - Ideally we avoid it
 - Preferred location? ADFG could give us locations that are better/CH areas to avoid.
 - Carlton can provide more information
 - We can send the methods/
 - Moving ahead – if there are specific avoidance areas, let's point that out.
 - June window at low tide – also, does the cable move around? That would potentially affect habitat.
- GCI
 - our boats are contracted boats to do install and our schedule is rigid.
 - We may try to find a different time frame that can work.
 - Sharee flagged the cost of the boat.

From: [Alas, Jeanette M \(DFG\)](#)
To: [Josh Grabel](#)
Cc: [Emily Creely](#)
Subject: RE: [EXT] Chignik River work window
Date: Monday, October 9, 2023 3:50:58 PM

Hi Josh and Emily,

ADF&G's Comm Fish area biologist (Carl Burnside) took a closer look at the map you sent with the fiber optic cable route and wanted to let you know that keeping the route closer to the shore and out of the main channel, like you have at the "U" bend around those shallow islands right before the cable reaches the dock and stays aboveground, is preferable to the cable being in the main channel. I don't foresee ADF&G having any additional comments until we have more details on the specifics of how the cable will be placed and what equipment will be used.

Thanks,
Jeanette

From: Josh Grabel <jgrabel@dowl.com>
Sent: Monday, September 18, 2023 12:49 PM
To: Alas, Jeanette M (DFG) <jeanette.alas@alaska.gov>
Cc: Emily Creely <ecreely@dowl.com>
Subject: RE: [EXT] Chignik River work window

Jeanette,

Thanks for the additional information. I have passed this on to Emily Creely, our project manager at DOWL. She will bring this up with the client.

Thanks,

Josh Grabel, PWS
Environmental Specialist

DOWL

(907) 562-2000 | office
(907) 865-1258 | direct

dowl.com

From: Alas, Jeanette M (DFG) <jeanette.alas@alaska.gov>
Sent: Monday, September 18, 2023 12:42 PM
To: Josh Grabel <jgrabel@dowl.com>
Subject: RE: [EXT] Chignik River work window

Hi Josh,

I already heard back from the area biologists about the cable placement and I learned a lot. Notably, that the approximate Chignik River cable location is within king salmon spawning habitat, and that the king runs were at a historic low in this system last year (in fact, they were a fraction of the

previous 50+ year low). Given that, the cable placement in this area is of high concern and the area biologists are recommending a timing window from June 1-30 only. They also requested to see if the cable could cross the Chignik River at a different location altogether to avoid impacts to spawning king salmon. The Comm Fish biologist also inquired about the location for the cable in Chignik Lagoon as many seiners fish in shallow waters here from mid-June through the end of August, and there could be conflicts with the project depending on timing. As the project moves ahead, I'd recommend we set up a call with you, me, and the Sport Fish and Comm Fish area biologists to talk through this project and see if we can work together to figure out the best location and timing that meet the goals of the project. I'm not sure what timeline you are working on, but wanted to let you know that we are happy to meet at the earlier project stages to save time when it comes to permitting.

Thanks and please let me know if you have additional questions,
Jeanette

From: Josh Grabel <jgrabel@dowl.com>
Sent: Thursday, September 14, 2023 10:48 AM
To: Alas, Jeanette M (DFG) <jeanette.alas@alaska.gov>
Subject: RE: [EXT] Chignik River work window

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Jeanette,

The fiber optic installation for this project would only be conducted in the Chignik River as far as streams.

I'm not certain if they would plow in the cable or direct lay without burial. Those details are still being developed.

The figure attached is not great for showing the route up the Chignik River, but the cable route would travel up Chignik Lagoon and make landfall at the boat launch located off Riverfront Drive C Street.

Thanks,

Josh Grabel, PWS
Environmental Specialist

DOWL

(907) 562-2000 | office
(907) 865-1258 | direct

dowl.com

From: Alas, Jeanette M (DFG) <jeanette.alas@alaska.gov>
Sent: Tuesday, September 12, 2023 10:31 AM
To: Josh Grabel <jgrabel@dowl.com>
Subject: [EXT] Chignik River work window

You don't often get email from jeanette.alas@alaska.gov. [Learn why this is important](#)

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

Hi Josh,

I am the Habitat permitter for the Chignik area and your request for the work window in the area was forwarded to me. I'll check with the area biologists for specifics, but our default in water work window for anadromous water bodies is typically mid-May to mid-July. Your email said you're at the early stages of the project but any details you can provide on the work that will be done may help the area biologists with an appropriate timing window. If it's fiber optic cable installation, I assume it would be isolating the in water work area, then trenching and burying the cable, but if I'm way off the mark, just let me know what the general activities are intended to be and in which specific streams (e.g., just Chignik River or others in the area) and which specific locations as well, if you have that info yet.

Thanks,
Jeanette

Jeanette Alas
(*she/her*)
ADF&G Habitat Section
333 Raspberry Rd
Anchorage, AK 99518
907-267-2805
<https://www.adfg.alaska.gov/index.cfm?adfg=uselicense.main>

From: [Bonnie Easley-Appleyard - NOAA Federal](#)
To: [Larson, Meghan](#)
Cc: [andrew.bielakowski@firstnet.gov](#); [apereira@ntia.gov](#); [cmiller3@gci.com](#); [Emily Creely](#); [Greg Balogh - NOAA Federal](#); [Leah Davis - NOAA Federal](#); [Sharee Tserlentakis \(Marin\)](#)
Subject: Re: [EXT]:Previous AU GCI Monitoring Report
Date: Monday, October 30, 2023 10:38:01 AM
Attachments: [image001.png](#)
[image002.png](#)

You don't often get email from bonnie.easley-appleyard@noaa.gov. [Learn why this is important](#)

Hi Everyone,

We had a chance to review the materials you sent over and have an internal discussion (ESA & MMPA offices) regarding the remainder of the AU Aleutian Fiber Optic Cable Installation project. We no longer believe this is a formal consultation or in need of an IHA. The ESA office would still like to meet with you on Monday to fully understand the difference between what was previously consulted on and what is remaining to determine the path forward for the informal ESA Section 7 consultation but we wanted to give you a heads up.

Bonnie Easley-Appleyard

Marine Mammal Specialist
NOAA Fisheries, Alaska Region
Office: (907) 271-5172
www.fisheries.noaa.gov

On Tue, Oct 24, 2023 at 9:26 AM Bonnie Easley-Appleyard - NOAA Federal <bonnie.easley-appleyard@noaa.gov> wrote:

Thanks Meghan for the additional information. After our meeting we looked at our schedules and it was impossible for us to meet internally prior to Monday. Would it be possible for you to meet instead on Thursday Nov 2nd at 9 am AKT or Monday Nov 6th at 9 am AKT? It looks like all three of us are available both of those times.

Bonnie Easley-Appleyard

Marine Mammal Specialist
NOAA Fisheries, Alaska Region
Office: (907) 271-5172
www.fisheries.noaa.gov

On Mon, Oct 23, 2023 at 2:57 PM Larson, Meghan <[Meghan.Larson@westonsolutions.com](mailto: Meghan.Larson@westonsolutions.com)> wrote:

Thank you, Bonnie! And thank you to everyone for the discussion this morning, we appreciate your time and guidance.

Please find the following attached for reference as well:

1. Vicinity map
2. AUA BA submitted to NMFS
3. AUA LOC from NMFS

Additionally, the following is a summary of sightings during the AUA project based on the monitoring report Bonnie provided this morning and a summary of sound source proxies.

AUA Sighting Summary

Reactions were documented in 8 sightings of 12 individuals total; however, Smultea did not attribute reactions to vessel operations specifically. The data sheets do not say what the activity was at the time of sighting, so it is not clear if the sightings occurred while the vessel was in DP.

- Steller Sea Lion – 3 sightings, 4 individuals total; ‘Look’ was recorded as the reaction during all sightings
- Sea Otter – 5 sightings, 8 individuals total;
 - 1 sighting/1 animal ‘Dive’ was the reaction
 - 2 sightings/5 animals ‘Look’ was the reaction
 - 1 sighting/1 animal ‘Speed up’ was the reaction
 - 1 sighting/1 individual ‘Change direction’ was the reaction

“Behavioral changes were noted for eight of the marine mammal detections, however none indicated that the animals were reacting specifically to vessel operations. It should be noted that assessing behavioral changes can be difficult from vessels that are underway. The reactions observed could have been for any number of stimuli and not just the operations or vessel noise. Since the noise produced by the operations is similar in caliber to that of engine noise, it would be difficult to parse what an animal is reacting to when underway.”

The following is a summary of marine mammals sighted within 2.3 km of the vessel (assumed to be the Level B acoustic harassment threshold during cable laying operations based on *Fugro Synergy* measurements). There were nearly an equal number of hours the PSOs were on watch while cable laying was not occurring (308 h; i.e., sightings included in the table below that would not be considered an exposure because a sound source was not active) as there were when PSOs were not on watch and cable laying was occurring

(324 h; i.e., when exposures may have occurred but not been document because PSOs were not on watch). It seems reasonable in this brief analysis these two differentiators would counterbalance each other, and the total number of sightings listed below would be an appropriate assumption for total potential project exposures within the Level B acoustic harassment threshold.

Species	# of Sightings	Total # of Individuals	Average Detection Distance (m) ¹	Average CPA (m) ¹
Dall's Porpoise	6	28	234	219
Fin Whale ²	25	36	1286	1131
Harbor Seal	1	1	75	50
Humpback Whale ²	85	140	1268	1057
Pacific White-sided Dolphin	1	2	5	5
Sea Otter ^{2, 3}	12	41	466	385
Steller Sea Lion ²	11	18	489	445
Unidentified Whale	23	55	1160	1156

¹Unweighted sighting average, does not account for multiple individuals in a given sighting.

²Listed as 'Endangered' under the Endangered Species Act

³Managed by USFWS

Sound Source Proxies

In AUA three sound sources were used:

1. Cable laying barge in shallow waters (non-impulsive sound): 149 dB re 1 μ Pa rms at 100 m based on Blackwell and Greene (2003) which measured the tug *Leo* pushing a full barge *Katie II* near the Port of Anchorage while using its thrusters to maneuver the barge during docking. 2.8 km Level B acoustic harassment threshold. Our understanding is a tug/barge combo will not be used for AU2, rather a 40- or 80-ft landing craft will be used. We haven't identified a sound source proxy for this yet because it is still unclear if the 40- or 80-ft boat will be used. The engines are 600 HP each and it is assumed they will have a much smaller acoustic footprint than the barge did.
2. Cable laying ship in all but shallow waters (non-impulsive sound): 119 to 127 dB re 1 μ Pa rms at 1 km from Warner and McCrodan (2011) which measured the *Fugro Synergy* while using dynamic positioning thrusters during geotechnical coring

operations in the Chukchi Sea. 2.3 km Level B acoustic harassment threshold. Important to note is this project proposes to use the *IT Integrity* ([spec sheet available here](#)) vs. the *IT Intrepid* which was used for AUA and is significantly bigger.

For AU2, a water jet is also being proposed:

3. Water jet: 176 dB re 1 μ Pa rms from Austin (2017) which measured sound from a Caviblaster in Cook Inlet. 860 m Level B acoustic harassment threshold.

Thank you, again,
Meghan

Meghan Larson

☎(907) 982-5529 ✉ Meghan.Larson@WestonSolutions.com

From: Bonnie Easley-Appleyard - NOAA Federal <bonnie.easley-appleyard@noaa.gov>
Sent: Monday, October 23, 2023 9:41 AM
To: andrew.bielakowski@firstnet.gov; apereira@ntia.gov; emiller3@gci.com; Emily Creely <ecreely@dowl.com>; Greg Balogh - NOAA Federal <greg.balogh@noaa.gov>; Leah Davis - NOAA Federal <leah.davis@noaa.gov>; Larson, Meghan <Meghan.Larson@WestonSolutions.com>; Sharee Tserlentakis (Marin) <smarin@gci.com>
Subject: [EXT]:Previous AU GCI Monitoring Report

***** External Message *** -- PROBE message before clicking links or opening attachments.**

Bonnie Easley-Appleyard
Marine Mammal Specialist
NOAA Fisheries, Alaska Region
Office: (907) 271-5172
www.fisheries.noaa.gov

From: [Tencza, Michael G II CIV USARMY CEPOA \(USA\)](#)
To: [Emily Creely](#)
Cc: [Bruce Rein](#); [Sharee Tserlentakis \(Marin\)](#)
Subject: RE: [EXT] RE: New Project - Looking at initial Section 408 projects
Date: Monday, November 20, 2023 11:58:14 AM

No worries. Glad you were able to find an alternate landing/route for Port Lions. Thanks for the updated KMZ for False Pass. Let us know if anything changes with the 2nd phase of the AU Aleutian project and we can re-evaluate for potential Section 408 concerns.

Respectfully,
-Michael
907-753-2648

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

From: Emily Creely <ecreely@dowl.com>
Sent: Friday, November 17, 2023 10:22 AM
To: Tencza, Michael G II CIV USARMY CEPOA (USA) <Michael.G.Tencza@usace.army.mil>
Cc: Bruce Rein <brein@gci.com>; Sharee Tserlentakis (Marin) <smarin@gci.com>
Subject: [Non-DoD Source] RE: [EXT] RE: New Project - Looking at initial Section 408 projects

Thank you Michael!

For Port Lions, we just finalized a new landing and so we are no longer landing near the harbor and are instead routing around to land at Wakefield Bay. So we do not anticipate any consultation required!
The attached KMZ shows our landing areas.
Let me know if you have any questions,
Em

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

From: Tencza, Michael G II CIV USARMY CEPOA (USA) <Michael.G.Tencza@usace.army.mil>
Sent: Friday, November 17, 2023 9:54 AM
To: Emily Creely <ecreely@dowl.com>
Cc: Bruce Rein <brein@gci.com>; Sharee Tserlentakis (Marin) <smarin@gci.com>
Subject: RE: [EXT] RE: New Project - Looking at initial Section 408 projects

Emily,

This is to follow up our Port Lions discussion via webinar/teleconference on 16-Oct-2023 and based on the information provided in your e-mail dated 12-Sep-2023 for other projects under consideration:

-Ouzinkie: The new, proposed route/landing site will not require a Section 408 request. Thanks for the png image file.

-False Pass: No file was attached but you state the alignment was updated/fixed to avoid the marine environment near the harbor. Please provide an updated kmz or png file when you get the chance.

-Port Lions: We've completed our review of the historical project files and confirmed the rock shoreline protection is part of the Federal project. See attached for more information. The City of Port Lions is the local sponsor of the harbor and you will need a Statement of No Objection from them in accordance with paragraph 11.a. of the previously attached EC 1165-2-220 as part of your Section 408 request. We prefer that the local sponsor provide this statement on city letterhead and signed by the appropriate community official.

Also for your awareness I will be out of the office starting 6-Dec-2023 and will not return until 8-Jan-2024. If you end up having the Section 408 request ready during this timeframe, then please coordinate it with Julie Anderson by email at Julie.L.Anderson@usace.army.mil and/or phone at 907-488-5408. Please CC me on any e-mail

correspondence and I'll catch up after the holidays.

Thank you,
-Michael
907-753-2648

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

From: Tencza, Michael G II CIV USARMY CEPOA (USA)
Sent: Monday, October 16, 2023 12:13 PM
To: Emily Creely <ecreely@dowl.com>
Cc: Bruce Rein <brein@gci.com>; Sharee Tserlentakis (Marin) <smarin@gci.com>
Subject: RE: [EXT] RE: New Project - Looking at initial Section 408 projects

Emily,

As discussed during our meeting this morning on the fiber optic landing at Port Lions, a Section 408 request may be necessary as the rock shoreline protection may be part of the Federal project. Give us some time to find the historical project files and confirm.

Attached is a copy of Engineer Circular (EC) 1165-2-220 which is the policy and procedural guidance we follow on Section 408 requests. For now I would take a look at paragraphs 1, 6, 10, and 11. Once we receive your request, we will go through the process outlined in paragraph 13. Be sure to describe the full scope of the project in the request, not just items you think may trigger a Section 408 approval. A Safety Assurance Review (SAR) is not anticipated to be required. Also, a 65% design is desirable with your request. Don't forget to include any maintenance and/or monitoring requirements that may be necessary in relation to the proposed infrastructure and who will be responsible for these activities.

Note the Section 408 request is in addition to any permit that may be required from our Regulatory Division. Ideally, we would receive both the Regulatory permit application and Section 408 request at the same time in order to streamline the process between the two programs. The Section 408 request can be submitted by e-mail directly to me. If the file size for the Section 408 request is too large, then I can provide you with a ftp site link for transfer to me. Just send me an e-mail notification when ready for that step. Please go through the normal channels of submitting the permit application to our Regulatory Division.

After our meeting Rebecca and I thought of a couple more items that we wanted to bring to your attention:

1) There is at least one survey monument along the rock shoreline protection. Ideally, this monument would not be disturbed.

2) Our Project & Index Book mentions that a severe winter storm in 1981 caused extensive damage to the main breakwater when it was originally being constructed. It is possible that some of the breakwater materials, including large armor stone, are well beyond the footprint of the existing breakwater on the seaward side.

I'm in the process of uploading our project condition survey from 2020 as well as the as-built drawings from 2017 to the DoD SAFE ftp site. The package is ~52MB zip file. You should be receiving an e-mail from them soon with download instructions. The file must be downloaded within the next 7 days after which it will automatically be deleted from the system. Let me know if you have any issues with the data or wish to schedule a follow up meeting.

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:

Blocked<https://www.poa.usace.army.mil/About/Offices/Construction-Operations/Operations-Branch/>

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

From: Emily Creely <ecreely@dowl.com>
Sent: Friday, October 13, 2023 8:16 AM
To: Tencza, Michael G II CIV USARMY CEPOA (USA) <Michael.G.Tencza@usace.army.mil>
Subject: [Non-DoD Source] RE: [EXT] RE: New Project - Looking at initial Section 408 projects

Thank you!

I made an outlook invite and embedded the links :)

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

From: Tencza, Michael G II CIV USARMY CEPOA (USA) <Michael.G.Tencza@usace.army.mil>
Sent: Friday, October 13, 2023 8:04 AM
To: Emily Creely <ecreely@dowl.com>
Subject: RE: [EXT] RE: New Project - Looking at initial Section 408 projects

Yes, that will work as well. Same meeting login details as sent in my previous e-mail.

Have a great weekend.

-Michael

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

From: Emily Creely <ecreely@dowl.com>
Sent: Thursday, October 12, 2023 4:28 PM
To: Tencza, Michael G II CIV USARMY CEPOA (USA) <Michael.G.Tencza@usace.army.mil>
Subject: [Non-DoD Source] RE: [EXT] RE: New Project - Looking at initial Section 408 projects

Mike,

Welp there is a conflict on our side I wasn't aware of. Any chance you have 10 am on Monday available?

Em

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

From: Tencza, Michael G II CIV USARMY CEPOA (USA) <Michael.G.Tencza@usace.army.mil>
Sent: Thursday, October 12, 2023 3:23 PM
To: Emily Creely <ecreely@dowl.com>
Cc: Bruce Rein <brein@gci.com>; Sharee Tserlentakis (Marin) <smarin@gci.com>
Subject: RE: [EXT] RE: New Project - Looking at initial Section 408 projects

Emily,

Let's plan on Friday (13-Oct) at 2pm to discuss the proposed Port Lions landing. I'd prefer a webinar so we can share maps/drawings on the screen as necessary. Here is the login link:

Blocked<https://usace1.webex.com/meet/michael.g.tencza>

You can have the meeting call you during the webinar login process. Alternatively, you can dial the following conference numbers:

US Toll Free 1-844-800-2712
US Caller Paid 1-669-234-1177
Access Code 1994044774

If that time no longer works then please just let me know and we can attempt to reschedule for next week.

Respectfully,

-Michael

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

From: Emily Creely <ecreely@dowl.com>

Sent: Thursday, October 12, 2023 9:01 AM

To: Tencza, Michael G II CIV USARMY CEPOA (USA) <Michael.G.Tencza@usace.army.mil>

Cc: Bruce Rein <brein@gci.com>; Sharee Tserlentakis (Marin) <smarin@gci.com>

Subject: [Non-DoD Source] RE: [EXT] RE: New Project - Looking at initial Section 408 projects

Good morning Mike!

I just left you a (long) message and am following up. Long story short, can we find a time when we could chat through the details of the Port Lions landing and what consultation may include?

Right now, I have Bruce and Sharee's availability on my computer, so if you call me back we can find that timeframe easiest. But - just to be sure, if this works - could you meet in the following timeframes?

Today: noon

Tomorrow: Noon, 2-4:30

I'll await your response.

Thank you!

Em

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

From: Tencza, Michael G II CIV USARMY CEPOA (USA) <Michael.G.Tencza@usace.army.mil>

Sent: Tuesday, September 5, 2023 3:58 PM

To: Emily Creely <ecreely@dowl.com>

Cc: Sharee Tserlentakis (Marin) <smarin@gci.com>

Subject: [EXT] RE: New Project - Looking at initial Section 408 projects

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

Emily,

Thanks for the phone call this afternoon and to recap that conversation:

- 1) The proposed fiber route at/near Ouzinkie passes through the Federally authorized/constructed harbor and would trigger a formal Section 408 review. I highly recommend a different route as far away from the harbor as possible. Keep in mind that while a "50 foot buffer" may seem reasonable now, these harbors often get re-evaluated for navigation improvements to include harbor expansion. Attached are some reference materials on this project.
- 2) Similar to Ouzinkie the proposed fiber route at/near Port Lions passes through the Federally authorized/constructed harbor and would trigger a formal Section 408 review. I highly recommend a different route as far away from the harbor as possible. Note that the breakwater gap along the shoreline was recently filled in. Also attached are some reference materials on this project.
- 3) At Chignik there is an existing landing near the Federally authorized/constructed harbor. The fiber is proposed to be extended to Chignik Lagoon and Chignik Lake. To the best of my knowledge we don't have projects currently in these two locations, but may have some active or upcoming studies. I will have to verify and follow up as those studies are managed by a different office in the AK District.
- 4) Similar to Chignik there is an existing landing near King Cove that is proposed to be extended to Cold Bay. I'm not aware of any USACE project in Cold Bay but will verify if there are any active or upcoming studies.
- 5) False Pass you're working to verify the proposed versus existing route of fiber. In particular a norther stretch crosses from land, to water, and then traverses the causeway at the southern/western edge of the harbor. This harbor is Federally authorized/constructed with the causeway serving as a betterment (in lieu of a breakwater) to the project. This would likely trigger a Section 408 review. Project information is also attached for your reference.

Did I miss any projects from the phase 2 scope? Let me know if there is any interest in a webinar/teleconference in a couple weeks to discuss further with your team.

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:
Blocked<https://Blockedwww.poa.usace.army.mil/About/Offices/Construction-Operations/Operations-Branch/>

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

From: Emily Creely <ecreely@dowl.com>
Sent: Tuesday, August 29, 2023 4:09 PM
To: Tencza, Michael G II CIV USARMY CEPOA (USA) <Michael.G.Tencza@usace.army.mil>
Cc: Sharee Tserlentakis (Marin) <smarin@gci.com>
Subject: [Non-DoD Source] RE: New Project - Looking at initial Section 408 projects

Hi Michael,

Sorry, am re-sending as I forgot to cc Sharee!

You have very graciously assisted me with two previous fiber option projects in the past and I'm wondering if you can assist me with another one.

I have another broadband project and it's the 2nd phase of the AU Aleutian project. I just started work on it but wanted to reach out ASAP as I'm pretty the engineers have landed on a spot that would require a 408 review (Port Lions Navigation project). When I first got the line work this caught my eye so I have already asked the project team/engineer about their planned methods at this location. Frankly I'm hoping they move the whole landing.

But besides Port Lions, I'm wondering if you can double check me that none of the other landing areas have potential conflict with Section 408 projects.

I've attached the KMZ to assist.

Thank you!

Emily

From: [Tencza, Michael G II CIV USARMY CEPOA \(USA\)](#)
To: [Emily Creely](#)
Cc: [Bruce Rein](#); [Sharee Tserlentakis \(Marin\)](#)
Subject: RE: [EXT] RE: New Project - Looking at initial Section 408 projects
Date: Friday, November 17, 2023 10:09:13 AM

Hi Emily,

Sorry for the additional e-mail but also wanted to follow up on the fiber to Chignik Lagoon, Chignik Lake, and Cold Bay. I heard back from our Planning Section and there are no upcoming or ongoing Civil Works projects in these locations. Therefore, no Section 408 coordination is necessary for those three locations at this time.

Respectfully,
-Michael
907-753-2648

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

From: Tencza, Michael G II CIV USARMY CEPOA (USA)
Sent: Friday, November 17, 2023 9:54 AM
To: Emily Creely <ecreely@dowl.com>
Cc: Bruce Rein <brein@gci.com>; Sharee Tserlentakis (Marin) <smarin@gci.com>
Subject: RE: [EXT] RE: New Project - Looking at initial Section 408 projects

Emily,

This is to follow up our Port Lions discussion via webinar/teleconference on 16-Oct-2023 and based on the information provided in your e-mail dated 12-Sep-2023 for other projects under consideration:

-Ouzinkie: The new, proposed route/landing site will not require a Section 408 request. Thanks for the png image file.

-False Pass: No file was attached but you state the alignment was updated/fixed to avoid the marine environment near the harbor. Please provide an updated kmz or png file when you get the chance.

-Port Lions: We've completed our review of the historical project files and confirmed the rock shoreline protection is part of the Federal project. See attached for more information. The City of Port Lions is the local sponsor of the harbor and you will need a Statement of No Objection from them in accordance with paragraph 11.a. of the previously attached EC 1165-2-220 as part of your Section 408 request. We prefer that the local sponsor provide this statement on city letterhead and signed by the appropriate community official.

Also for your awareness I will be out of the office starting 6-Dec-2023 and will not return until 8-Jan-2024. If you end up having the Section 408 request ready during this timeframe, then please coordinate it with Julie Anderson by email at Julie.L.Anderson@usace.army.mil and/or phone at 907-488-5408. Please CC me on any e-mail correspondence and I'll catch up after the holidays.

Thank you,
-Michael
907-753-2648

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

From: Tencza, Michael G II CIV USARMY CEPOA (USA)
Sent: Monday, October 16, 2023 12:13 PM
To: Emily Creely <ecreely@dowl.com>
Cc: Bruce Rein <brein@gci.com>; Sharee Tserlentakis (Marin) <smarin@gci.com>
Subject: RE: [EXT] RE: New Project - Looking at initial Section 408 projects

From: O'Connell, Bill A (DEC)
To: Emily Creely; Voigt, Alena D (DEC); Wood, Alyssa (DEC)
Subject: RE: [EXT] RE: Proposed fiber optic project in Aleutians (Cold Bay, Chignik Lake)
Date: Friday, December 15, 2023 9:33:48 AM

Sounds good, just looking at the list of site I don't think any of them have been very well characterized but we should at least know where the contamination was first encountered.

Bill

Bill O'Connell
Site Cleanup Manager
ADEC Contaminated Sites Program
(907) 269-3057

From: Emily Creely <ecreely@dowl.com>
Sent: Friday, December 15, 2023 9:31 AM
To: O'Connell, Bill A (DEC) <bill.oconnell@alaska.gov>; Voigt, Alena D (DEC) <alena.voigt@alaska.gov>; Wood, Alyssa (DEC) <alyssa.wood@alaska.gov>
Subject: RE: [EXT] RE: Proposed fiber optic project in Aleutians (Cold Bay, Chignik Lake)

You don't often get email from ecreely@dowl.com. [Learn why this is important](#)

Thanks!

Also the project has buildouts in False Pass, Chignik Lagoon, Chignik Lake, Port Lions, Perryville and Ouzinkie. But by far Cold Bay is the site with the most to evaluate. The only other communities where we are within 1,500 of active/IC sites is Ouzinkie and Chignik Lake and these are those sites:

Site Name	Hazard ID	Status	Associated Community	Groundwater Contamination	Summary	Last Action	Approximate Distance to Project (ft)
City of Ouzinkie Former BIA Tank Farm	25768	Active	Ouzinkie	unknown	Unknown amount of petroleum product spilled from tank farm.	Phase 1 ESA has been completed.	0-50
Chignik Lake Tribal Council Old TF	3786	Active	Chignik Lake	unknown	Unknown amount of petroleum product spilled from tank farm.	No site investigation has been conducted.	0-50
Chignik Lake Fuel Transfer	3787	Active	Chignik Lake	unknown	Unknown amount of petroleum product spilled from tanks.	No site investigation has been conducted.	0-50
Chignik Lake ANTHC Water Line Upgrade	26533	Active	Chignik Lake	Yes	Unknown amount of petroleum product encountered during trenching. Shallow groundwater affected. No site investigation has been conducted.	??	150-200

I'm working through these now and I may end up needing more information about these sites (including the Phase 1 for #25768) and whether there is anything new lately I can use for the Chignik Lake sites.

Em

Emily Creely, PWS
Environmental Specialist

DOWL

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

dowl.com

From: O'Connell, Bill A (DEC) <bill.oconnell@alaska.gov>
Sent: Friday, December 15, 2023 9:22 AM
To: Emily Creely <ecreely@dowl.com>; Voigt, Alena D (DEC) <alena.voigt@alaska.gov>; Wood, Alyssa (DEC) <alyssa.wood@alaska.gov>
Subject: RE: [EXT] RE: Proposed fiber optic project in Aleutians (Cold Bay, Chignik Lake)

Thanks Emily, I'll let Alyssa and Alena respond on their sites but this information will be very helpful.

Bill

Bill O'Connell
Site Cleanup Manager
ADEC Contaminated Sites Program
(907) 269-3057

From: Emily Creely <ecreely@dowl.com>
Sent: Friday, December 15, 2023 9:19 AM
To: O'Connell, Bill A (DEC) <bill.oconnell@alaska.gov>; Voigt, Alena D (DEC) <alena.voigt@alaska.gov>; Wood, Alyssa (DEC) <alyssa.wood@alaska.gov>
Subject: RE: [EXT] RE: Proposed fiber optic project in Aleutians (Cold Bay, Chignik Lake)

You don't often get email from ecreely@dowl.com. [Learn why this is important](#)

Yes!

And kmz files.

Attached is the Cold Bay figure and kmz for the project and the DEC sites.

So again, the red line is our trench alignment (up to 3 feet bgs) and about every 200 feet will be a vault (5 feet bgs). The vaults are move-able somewhat so if we think 5 feet deep is problematic in some areas, I can work with the engineers to avoid some areas.

Again, that will take some focus but if that makes your life easier, I can dig in to that level.

Em

Emily Creely, PWS
Environmental Specialist

DOWL

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

dowl.com

From: O'Connell, Bill A (DEC) <bill.oconnell@alaska.gov>
Sent: Friday, December 15, 2023 9:16 AM
To: Emily Creely <ecreely@dowl.com>; Voigt, Alena D (DEC) <alena.voigt@alaska.gov>; Wood, Alyssa (DEC) <alyssa.wood@alaska.gov>
Subject: RE: [EXT] RE: Proposed fiber optic project in Aleutians (Cold Bay, Chignik Lake)

Thanks Emily, do you have figures showing the proposed alignment?

Bill

Bill O'Connell
Site Cleanup Manager

From: Emily Creely <ecreely@dowl.com>
Sent: Friday, December 15, 2023 9:13 AM
To: O'Connell, Bill A (DEC) <bill.oconnell@alaska.gov>; Voigt, Alena D (DEC) <alena.voigt@alaska.gov>; Wood, Alyssa (DEC) <alyssa.wood@alaska.gov>
Subject: RE: [EXT] RE: Proposed fiber optic project in Aleutians (Cold Bay, Chignik Lake)

You don't often get email from ecreely@dowl.com. [Learn why this is important](#)

Thank you!

We have done quite a bit of geotech work out in Cold Bay and I was surprised how deep the groundwater was – then I was talking to our geologist about that region and its geology and it makes sense to me now. In one of our reports for work to the east of the runway the report said

"The subsurface conditions in Cold Bay are characterized by several hundred feet of outwash and morainal deposits and gravels mantled by silt and peat; no permafrost is known to exist in the general vicinity of the airport. Subsurface investigations to the east of the runway have underlying existing fill with loose, silty sand with organic material extending up to 10 feet below the existing grade. Below this layer is generally silty sand; groundwater was not encountered and dewatering during construction was not anticipated by the geotechnical report."

So for sites that our trenching is near but the contamination has been documented to be NOT in the groundwater, I figure we have BMPs in place but I wouldn't expect to hit anything at the depths we are hitting. Therefore I'm trying to write a report that pinpoints where, exactly, the possibility of encountering contamination is possible.

Essentially the more I can understand and explain the site conditions, the more targeted the plan can be.

Em

Emily Creely, PWS
Environmental Specialist

DOWL

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

dowl.com

From: O'Connell, Bill A (DEC) <bill.oconnell@alaska.gov>
Sent: Friday, December 15, 2023 8:35 AM
To: Emily Creely <ecreely@dowl.com>; Voigt, Alena D (DEC) <alena.voigt@alaska.gov>; Wood, Alyssa (DEC) <alyssa.wood@alaska.gov>
Subject: [EXT] RE: Proposed fiber optic project in Aleutians (Cold Bay, Chignik Lake)

You don't often get email from bill.oconnell@alaska.gov. [Learn why this is important](#)

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

Hi Emily, we don't have groundwater characterization for PFAS in Cold Bay. I think the depth to GW is likely quite a bit deeper than your vault depth so I don't suspect dewatering would be an issue, but if so we would look at the specific alignment of the fiber optic trench then make some judgment calls on whether or not PFAS might be present.

Groundwater has also not been characterized at Haz ID 3786 so we would take the same approach there I would imagine.

Bill

Bill O'Connell
Site Cleanup Manager
ADEC Contaminated Sites Program
(907) 269-3057

From: Emily Creely <ecreely@dowl.com>
Sent: Thursday, December 14, 2023 2:19 PM
To: Voigt, Alena D (DEC) <alena.voigt@alaska.gov>; O'Connell, Bill A (DEC) <bill.oconnell@alaska.gov>; Wood, Alyssa (DEC) <alyssa.wood@alaska.gov>
Subject: Proposed fiber optic project in Aleutians (Cold Bay, Chignik Lake)

Some people who received this message don't often get email from ecreely@dowl.com. [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon!

I'm overseeing the environmental compliance for a broadband project along the Aleutians and am working through the NEPA document and preparing for determining de-watering permits for the project and a contaminated site management plan. Also note, I am following the Technical Memorandum "Managing Petroleum-Contaminated Soil, Water, or Free Product during Public Utility and Right-of-Way Construction and Maintenance Projects."

The fiber optic cable will be trenched down to 3 feet bgs, with vaults (occurring every 200 feet or so) needing an excavation no deeper than 5 feet bgs.

With that said, I've screened everything down to the following sites either because site characterization hasn't occurred yet or because we are very close to it.

I don't know how to make this easy, but I'm hoping to determine if groundwater was documented as being impacted for the following sites. From there I can perhaps further narrow down which sites I need to really dig into (with your assistance). I suppose this is also an introduction to the fact that I'll need to coordinate with all of you over the next few months.

So long story short, can you tell me if it has been determined for these sites if groundwater was affected?

Site Name	Hazard ID	Status	Associated Community
ADOT&PF Cold Bay Airport Abandoned Fire Station	27198	Active	Cold Bay
ADOT&PF Cold Bay Airport Sitewide PFAS	27764	Active	Cold Bay
Chignik Lake Fuel Transfer	3787	Active	Chignik Lake
ADOT&PF Cold Bay Airport	2461	Active	Cold Bay
FAA Cold Bay Station Bldgs (9 sites)	25688-97	Active	Cold Bay
FAA Cold Bay Station Bldg 601 Dry Well	25699	Active	Cold Bay
FAA Cold Bay Station Bldg 601 Floor Drains	25700	Active	Cold Bay
FAA Cold Bay Station Bldg 601 Gas Shed	25701	Active	Cold Bay
Chignik Lake Tribal Council Old TF	3786	Active	Chignik Lake
Cold Bay Frosty Fuel Return Pipeline Spill	1548	Active	Cold Bay

Thank you in advance!

Also, I realize it's the holidays and you must be incredibly busy – that's sort of why I'm reaching out now to get the ball rolling. My goal is to have the CSMP by March/April and have the sites understood by February.

So I would like to be the rare requester who says 'I don't need this ASAP' and rather perhaps if we touch base in January that would be great.

Thoughts?

Em

Emily Creely, PWS
Environmental Specialist

DOWL

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

dowl.com

From: [Emily Creely](#)
To: [Voigt, Alena D \(DEC\)](#); bill.oconnell@alaska.gov; alyssa.wood@alaska.gov
Subject: Proposed fiber optic project in Aleutians (Cold Bay, Chignik Lake)
Date: Thursday, December 14, 2023 2:19:00 PM

Good afternoon!

I'm overseeing the environmental compliance for a broadband project along the Aleutians and am working through the NEPA document and preparing for determining de-watering permits for the project and a contaminated site management plan. Also note, I am following the Technical Memorandum "Managing Petroleum-Contaminated Soil, Water, or Free Product during Public Utility and Right-of-Way Construction and Maintenance Projects."

The fiber optic cable will be trenched down to 3 feet bgs, with vaults (occurring every 200 feet or so) needing an excavation no deeper than 5 feet bgs.

With that said, I've screened everything down to the following sites either because site characterization hasn't occurred yet or because we are very close to it.

I don't know how to make this easy, but I'm hoping to determine if groundwater was documented as being impacted for the following sites. From there I can perhaps further narrow down which sites I need to really dig into (with your assistance). I suppose this is also an introduction to the fact that I'll need to coordinate with all of you over the next few months.

So long story short, can you tell me if it has been determined for these sites if groundwater was affected?

Site Name	Hazard ID	Status	Associated Community
ADOT&PF Cold Bay Airport Abandoned Fire Station	27198	Active	Cold Bay
ADOT&PF Cold Bay Airport Sitewide PFAS	27764	Active	Cold Bay
Chignik Lake Fuel Transfer	3787	Active	Chignik Lake
ADOT&PF Cold Bay Airport	2461	Active	Cold Bay
FAA Cold Bay Station Bldgs (9 sites)	25688-97	Active	Cold Bay
FAA Cold Bay Station Bldg 601 Dry Well	25699	Active	Cold Bay
FAA Cold Bay Station Bldg 601 Floor Drains	25700	Active	Cold Bay
FAA Cold Bay Station Bldg 601 Gas Shed	25701	Active	Cold Bay
Chignik Lake Tribal Council Old TF	3786	Active	Chignik Lake
Cold Bay Frosty Fuel Return Pipeline Spill	1548	Active	Cold Bay

Thank you in advance!

Also, I realize it's the holidays and you must be incredibly busy – that's sort of why I'm reaching out now to get the ball rolling. My goal is to have the CSMP by March/April and have the sites understood by February. So I would like to be the rare requester who says 'I don't need this ASAP' and rather perhaps if we touch base in January that would be great.

Thoughts?
Em

Emily Creely, PWS
Environmental Specialist

From: [Emily Creely](#)
To: [Emily Creely](#)
Subject: FW: [EXT] RE: [EXTERNAL] GCI AU-II Fiber Optic Cable - ESA Consultation Question
Date: Thursday, December 14, 2023 1:24:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

From: Cooper, Douglass <douglass_cooper@fws.gov>
Sent: Wednesday, November 29, 2023 11:35 AM
To: Korsmo (Aughe), Stacey <Stacey.Aughe@WestonSolutions.com>
Cc: Emily Creely <ecreely@dowl.com>; Andrew.Bielakowski <andrew.bielakowski@firstnet.gov>; Pereira, Amanda <apereira@ntia.gov>; Howell, Kaitlyn J <kaitlyn_howell@fws.gov>; Larson, Meghan <[Meghan.Larson@WestonSolutions.com](mailto: Meghan.Larson@WestonSolutions.com)>
Subject: [EXT] RE: [EXTERNAL] GCI AU-II Fiber Optic Cable - ESA Consultation Question

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

Hi Stacey,

Because our previous consultation was informal with a concurrence letter (vs a formal consultation resulting in a biological opinion), there is functionally no difference between reinitiating and starting a new informal consultation. You can just submit a revised biological assessment with any revisions to your effects determinations and we can go from there. Let me know if you have any questions or concerns.

Doug

Douglass M. Cooper
Branch Chief - Ecological Services
Southern Alaska Fish and Wildlife Field Office, USFWS
4700 BLM Road
Anchorage, Alaska 99507
(907) 271-1467 (office)
(907) 891-6164 (cell)
douglass_cooper@fws.gov

To expedite requests for U.S. Fish and Wildlife Service consultations and project reviews, please send requests to: ak_fisheries@fws.gov and copy douglass_cooper@fws.gov.

From: Korsmo (Aughe), Stacey <Stacey.Aughe@WestonSolutions.com>
Sent: Monday, November 20, 2023 12:32 PM
To: Cooper, Douglass <douglass_cooper@fws.gov>

Cc: Emily Creely <ecreely@dowl.com>; andrew.bielakowski@firstnet.gov; apereira@ntia.gov;
Howell, Kaitlyn J <kaitlyn_howell@fws.gov>; Larson, Meghan
<Meghan.Larson@WestonSolutions.com>
Subject: [EXTERNAL] GCI AU-II Fiber Optic Cable - ESA Consultation Question

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good afternoon, Mr. Cooper,

GCI is proposing to install new subsea Fiber Optic Cable under the AU-Aleutian II Project. The project includes installation of seven new branch segments off the original AU-Aleutian subsea fiber network installed in 2021 (**Consultation 07CAAN00-2018-I-0066**) to provide broadband internet to additional communities. Weston Solutions has been designated as the Non-Federal Representative for the purposes of ESA Section 7 consultation by the National Telecommunications and Information Administration (NTIA) (see attached letter).

We are wondering if GCI will be required to initiate a new consultation for this project or if they are able to re-initiate the consultation completed for the 2021 installation. NMFS has asked that we re-initiate the previous consultation and submit a revised BA.

Could you provide guidance on which path we should take with USFWS? I've attached maps showing the FOC (existing cable in black with new branch segments in red) with USFWS ESA species ranges and critical habitat layers added. I've also attached the LOC received for the original AU-Aleutian project.

I left a couple voicemails as well, and I'm happy to set up a time to talk with you on the phone if that would be helpful.

Kind Regards,
Stacey Korsmo

**Working part-time: Monday - Wednesday*



Stacey Korsmo
Senior Project Scientist  

 (907) 301-5815  Stacey.Aughe@WestonSolutions.com

 Environmental and Infrastructure Solutions

CONFIDENTIALITY: This email and attachments may contain information which is confidential and proprietary. Disclosure or use of any such confidential or proprietary information without the written permission of Weston Solutions, Inc. is strictly prohibited. If you received this email in error, please notify the sender by return e-mail and delete this email from your system. Thank you.