From: Stephen Patton
To: Campellone, Estrella F CIV USARMY CEPOA (USA)
Subject: [Non-DoD Source] POA-2019-00313
Date: Monday, August 5, 2019 2:38:51 PM

This email constitutes a comment regarding the subject Public Notice of Application for a Permit.

Gentlemen:

The Public Notices states, "The proposed project may be located within a federal superfund site subject to CERCLA regulations as per March 2000 EPA Record of Decision (ROD) and would need to be reviewed by EPA. Approximately 53 acres of the contaminated sediments were capped with a thin-layer of sand; therefore, the ROD called for institutional controls to be established that would restrict certain uses in Ward Cove, including uses of the site that in any manner could interfere with, materially damage, or adversely affect the integrity or protectiveness of the sediment cap." (italics added)

The applicant proposes to pierce the thin sand cap with over 100 piles of varying diameter in construction of the proposed dock. Clearly, such work would interfere with and materially damage the thin sand cap (aka the sediment cap). It is altogether reasonable to assume that such work would also adversely affect the integrity and/or protectiveness of the sediment cap.

Neither of the applicant's proposed mitigation measures adequately allay concerns that the integrity or protectiveness of the sediment cap will be avoided or even minimized. More information is needed regarding the degree of disturbance by the proposed activity (pile driving and more particularly, the removal of the temporary piles) and the effect of such activity on the sediment cap; not to mention the effect of large cruise ship propellers and navigation thrusters during any docking process on the sediment cap.

I suggest that a public hearing be held prior to issuance of any USACE permit and that the applicant be required to present information that adequately addresses the concerns raised in these comments.

Respectfully,

Stephen M. Patton
722 College Court
Ketchikan, AK 99901

tel. 907-617-9433
email: kssmp6@gmail.com <mailto:kssmp6@gmail.com>