

U.S. Department of
Homeland Security

**United States
Coast Guard**



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16001
September 25, 2019

Army Corps of Engineers
Alaska District, Regulatory Division
P.O. Box 6898
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Dear Sir or Ma'am:

The Coast Guard has completed a navigational safety assessment for the Department of the Army (DA) for Ward Cove on Revillagigedo Island. Solstice Alaska Consulting, Inc. and Ward Cove Industries have requested project permits to authorize construction of a cruise ship pier (POA-2019-00313) and a vessel and barge lay-up facility (POA-2017-00166), respectively. Based on the results of the assessment, the Coast Guard finds that neither project, individually nor collectively, presents a significant navigational safety risk under the proposed conditions.

The local stakeholders in Ward Cove include: Alaska Marine Highway System (AMHS), Boyer Towing, and Ward Cove Industries. Following discussions with local stakeholders, the Coast Guard has determined the current vessel traffic in Ward Cove is seasonal and limited primarily to Boyer's towing vessels and barges. AMHS has also articulated a desire to build a pier extending from their property. However, as AMHS has not applied to the Army Corps for a permit at this time, our navigational safety assessment was limited to the two aforementioned projects. The narrowest point of the waterway between these two projects, if both are constructed, is projected to be in excess of 700ft.

Of the two private aid mooring buoys in the cove, Boyer Towing uses the northern buoy, located at approximately 55° 24' 08.47"N, 131° 43' 25.52"W, throughout the year. The southern buoy, located at approximately 55° 23' 57.92"N, 131° 43' 44.44"W, is used primarily during the winter. The Alaska Department of Natural Resources permitted the southern buoy (case file number: LAS 26850) but was not aware of, and did not permit, the northern buoy. The barges that use these mooring buoys are as large as 400ft in length and 100ft in breadth.

1. The Cruise Ship Pier (POA-2019-00313): the applicant intends to accommodate very large cruise ships upward of 1,000ft in length and 130ft in breadth. Boyer Towing has agreed to disconnect the southern mooring buoy during the cruise ship season (April to October) and reconnect it thereafter. Once the cruise ship pier is constructed, the navigable waterway between any barges using the aforementioned buoy and the pier will be approximately 498 feet, allowing ample navigable waterway for other stakeholders' traffic throughout the year, including winter. Vessel traffic will have to be coordinated and managed between cruise ships and all other vessels and barges entering Ward Cove during the cruise ship season to mitigate congestion and collision situations.

a. The Southeast Alaska Pilot's Association (SEAPA) has stated the addition of a buoy or pile aids to mark Bolles Ledge will greatly contribute to safe navigation due to its proximity to the pier and future cruise ship mooring evolutions. SEAPA has also stated an unlighted day beacon on East Island's outer limit will contribute significantly to safe navigation.

b. Propwash from cruise ships, and in particular those equipped with azipod thrusters, will have the potential to affect vessels maneuvering or moored near the proposed cruise ship pier, especially given the sheltered nature of Ward Cove. This problem is localized in nature and can be adequately addressed by standard navigation practices of broadcasting security calls and coordinating vessel movements. I recommend that you require installation of signs along the cruise ship pier to ensure that boaters are aware that propwash may be present in those areas.

2. **The Vessel and Barge Lay-up Facility (POA-2017-00166):** the applicant intends for the vessels using this pier to be limited to fishing vessels under 125 feet in length and barges up to 250 feet in length. SEAPA pilots will not be required due to the size of these vessels and navigating around Bolles Ledge will be the vessel master's responsibility. Transiting past the cruise ship pier, once constructed, may likely require coordination during mooring evolutions. The position of the facility in relation to the cruise ship pier should minimize, if not eliminate, the force of direct cruise ship propwash on moored vessels and barges.

3. **Both Projects:** neither project, individually nor collectively, would present a significant navigational safety risk under the proposed conditions. Comments from local stakeholders raise concerns with Ward Cove's status as an EPA Superfunds site and the potential environmental impact of driving pilings and future cruise ship azipod propwash on the pollutant sand caps; however, this is outside the scope and jurisdiction of the Coast Guard navigational safety assessment.

If you have any further questions, please contact LT Jesse Collins at Jesse.O.Collins@uscg.mil or at 907-463-2846.

Sincerely,



S. R. WHITE
Captain, U.S. Coast Guard
Captain of the Port, Southeast Alaska

Enclosure: (1) Navigational Risk Assessment, POA-2019-00313
(2) Navigational Risk Assessment, POA-2017-00166



Initial Risk Assessment for USACE Permits

Name of permit project: Ward Cove

Location: Ketchikan, AK

Permit Application Number: POA-2019-00313

This assessment used six criteria to explore the risk associated with the subject USACE permit application. Risk level determination for each criterion is based on various factors, including but not limited to, knowledge of the local area, an on-scene investigation of the proposed project, marine casualty data, discussions with local stakeholder groups, and the review of existing documentation for other projects in the area. Justification of each criterion's risk level is provided in the associated Discussion section.

Reviewer:			Date of Review:	
CRITERIA	RISK		DISCUSSION	
	Low	High		
Location	X		<p>Determination based on the proposed permit location in terms of the risk the area is exposed to from a collision or allision.</p> <p><u>Why is this risk determination made for this category?</u></p> <p>Ward Cove is host to several entities: Alaska Marine Highway System (AMHS), Boyer Towing, and Ward Cove Industries. The applicant intends to accommodate very large cruise ships upward of 1,000ft in length and 130ft in breadth. Our records show no reported collisions, allisions, or marine casualties in the area for the past 10 years. However, the introduction of very large cruise ship traffic creates challenges previously not encountered. The Southeast Alaska Pilot's Association (SEAPA) has stated the addition of a buoy or pile aids to mark Bolles Ledge will greatly contribute to safe navigation due to its proximity to this project and future cruise ship mooring evolutions. SEAPA has also stated an unlighted day beacon on East Island's outer limit will contribute significantly to safe navigation.</p>	
Traffic	X		<p>Determination based on the amount/type/activities of vessel traffic adjacent to the proposed permit location. Factors to consider - amount, size and frequency of traffic; speed of traffic/current; maneuvering constraints/limitations.</p> <p><u>Why is this risk determination made for this category?</u></p> <p>The vessel traffic in Ward Cove is seasonal and limited to Boyer's towing vessels and barges as large as 400ft in length with 100ft beams. Ward Cove Industries has requested an Army Corps Title 10</p>	

		<p>Project permit to build a vessel and barge lay-up facility approximately 750ft northeast of this project. Although the AMHS is considering building a lay-up facility, no AMHS ferries currently transit into Ward Cove. Of the two private aid mooring buoys in the cove, Boyer Towing uses the northern buoy, located at approximately 55° 24' 08.47"N, 131° 43' 25.52"W, throughout the year. The southern buoy, located at approximately 55° 23' 57.92"N, 131° 43' 44.44"W, is used primarily during the winter. The Alaska Department of Natural Resources permitted the southern buoy (case file number: LAS 26850) but was not aware of and did not permit the northern buoy. Boyer Towing has agreed to disconnect the southern buoy during the cruise ship season (April to October) and reconnect it thereafter. The barges that use these mooring buoys are as large as 400ft in length and 100ft in breadth. The navigable waterway between any barges using the southern buoy and the proposed pier should not be less than 498 feet, allowing ample navigable waterway for other stakeholders' traffic throughout the year, including winter. Vessel traffic will have to be coordinated and managed between cruise ships and all other vessels and barges entering or exiting Ward Cove during the cruise ship season to mitigate congestion and collision situations, in accordance with existing regulations. Propwash from cruise ships, and in particular those equipped with azipod thrusters, will have the potential to affect vessels maneuvering or moored near the proposed cruise ship pier, especially given the sheltered nature of Ward Cove. This problem is localized in nature and can be adequately addressed by standard navigation practices of broadcasting security calls and coordinating vessel movements. Signs should be installed along the pier to ensure that boaters are aware that propwash may be present in those areas.</p>
Response	X	<p>Determination based on the ability of local maritime response community (including Federal, State and local governments) to provide timely, adequate assistance to proposed permit location. <u>Why is this risk determination made for this category?</u></p> <p>Once underway, USCG Station Ketchikan's response time is less than 10 minutes by boat. Response boats are also available from State Troopers and Ketchikan Fire Dept.</p>
Anticipated Environmental factors	X	<p>Determination based on the location's exposure to high risk due to anticipated environmental factors that occur annually, such as fog, river flood stage, storms, ice, etc. <u>Why is this risk determination made for this category?</u></p> <p>No unusual environmental factors. Comments from local stakeholders raise concerns with Ward Cove's status as an EPA Superfunds site; however, this is outside the scope and jurisdiction of the Coast Guard navigational safety assessment.</p>

Severe and sudden environmental factors	X		<p>Determination based on the location's frequency of risk due to sudden and severe environmental factors such as hurricanes, flash floods, or tornados.</p> <p><u>Why is this risk determination made for this category?</u></p> <p>Earthquakes will occur in Alaska, but historically in Ketchikan they have not been significant enough to severely damage modern engineered structures. Comments from local stakeholders raise concerns with Ward Cove's status as an EPA Superfunds site; however, this is outside the scope and jurisdiction of the Coast Guard navigational safety assessment.</p>
Hydrological effects to Waterway	X		<p>Determination based on probability of hydrological issues having negative effects to proposed permit location and waterway (shoaling, standout, silting).</p> <p><u>Why is this risk determination made for this category?</u></p> <p>The National Oceanic and Atmospheric Administration (NOAA) performed a survey of Ward Cove in 2012. NOAA's subsequent report advised caution in a "Shoal and Hazardous Features" section, and the subsequent findings and precautions are noted on NOAA Chart 17430, Note B and Note C: "Due to the profusion of logs on the sea floor, mariners are advised against anchoring." No concerns were raised regarding standout or silting for the specific project location.</p>

OUTCOMES	<p>If low levels of risk are associated with each of the six criteria, support for the permit application should be considered.</p> <p>If high levels of risk are associated with any of the six criteria, an objection to the proposed project should be considered based on safety of navigation concerns.</p> <p><u>What steps were taken based on the risk assessment conducted?</u></p> <p>With the addition of navigation aids suggested by SEAPA, the construction of a cruise ship pier will not negatively impact safe navigation in Ward Cove.</p> <p>The proposed pier and cruise ships would occupy a large area in Ward Cove; however, adequate space would remain for reasonable clearance to facilitate safe navigation and access for other local stakeholders/neighboring docks. Although the area in question is sufficient to facilitate safe navigation, the permitting agency and local municipalities should give consideration to the stakeholder's environmental concerns relating to Ward Cove's status as an EPA Superfunds site.</p>
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Initial Risk Assessment for USACE Permits

Name of permit project: Ward Cove

Location: Ketchikan, AK

Permit Application Number: POA-2017-00166

This assessment used six criteria to explore the risk associated with the subject USACE permit application. Risk level determination for each criterion is based on various factors, including but not limited to, knowledge of the local area, an on-scene investigation of the proposed project, marine casualty data, discussions with local stakeholder groups, and the review of existing documentation for other projects in the area. Justification of each criterion's risk level is provided in the associated Discussion section.

Reviewer:			Date of Review:	
CRITERIA	RISK		DISCUSSION	
	Low	High		
Location	X		<p>Determination based on the proposed permit location in terms of the risk the area is exposed to from a collision or allision.</p> <p><u>Why is this risk determination made for this category?</u></p> <p>Ward Cove is host to several entities: Alaska Marine Highway System (AMHS), Boyer Towing, and Ward Cove Industries. Our records show no reported collisions, allisions, or marine casualties in the area for the past 10 years.</p>	
Traffic	X		<p>Determination based on the amount/type/activities of vessel traffic adjacent to the proposed permit location. Factors to consider - amount, size and frequency of traffic; speed of traffic/current; maneuvering constraints/limitations.</p> <p><u>Why is this risk determination made for this category?</u></p> <p>The applicant intends for vessels using the proposed lay-up facility to be limited to fishing vessels under 125ft in length and barges up to 250ft in length. The vessel traffic in Ward Cove is seasonal and limited to Boyer's towing vessels and barges as large as 400ft in length with 100ft beams. Solstice Alaska Consulting, Inc. has requested an Army Corps Title 10 Project permit to build a cruise ship pier approximately 750ft southwest of this project. Although the AMHS is considering building a lay-up facility, no AMHS ferries currently transit into Ward Cove. Of the two private aid mooring buoys in the cove, Boyer Towing uses the northern buoy, located at approximately 55° 24' 08.47"N, 131° 43' 25.52"W, throughout the</p>	

			<p>year. Its location in relation to the proposed vessel and barge lay-up facility on the opposing side of Bolles Ledge should not impact safe navigation. The southern buoy, located at approximately 55° 23' 57.92"N, 131° 43' 44.44"W, is used primarily during the winter. The Alaska Department of Natural Resources permitted the southern buoy (case file number: LAS 26850) but was not aware of and did not permit the northern buoy. The barges that use these mooring buoys are as large as 400ft in length and 100ft in breadth. Should the proposed cruise ship pier be permitted and constructed, Boyer Towing has agreed to disconnect the southern buoy during the cruise ship season (April to October) and reconnect it thereafter. The navigable waterway between any barges using the buoy and the proposed cruise ship pier should not be less than 498 feet, allowing ample navigable waterway for other stakeholders' traffic throughout the year, including winter. Vessel traffic will have to be coordinated and managed between cruise ships and all other vessels and barges entering or exiting Ward Cove during the cruise ship season to mitigate congestion and collision situations, in accordance with existing regulations. The smaller size of the vessels using the lay-up facility will not necessitate the carriage of marine pilots and navigating around Bolles Ledge will be the vessel master's responsibility. Transiting past the cruise ship pier, once constructed, may likely require coordination during mooring evolutions. The position of the facility in relation to the cruise ship pier should minimize, if not eliminate, the force of direct cruise ship propwash on moored vessels and barges. If the proposed cruise ship pier is not permitted and constructed, the navigable waterway will be larger and the risk of collision and congestion less.</p>
Response	X		<p>Determination based on the ability of local maritime response community (including Federal, State and local governments) to provide timely, adequate assistance to proposed permit location. <u>Why is this risk determination made for this category?</u></p> <p>Once underway, USCG Station Ketchikan's response time is less than 10 minutes by boat. Response boats are also available from State Troopers and Ketchikan Fire Dept.</p>
Anticipated Environmental factors	X		<p>Determination based on the location's exposure to high risk due to anticipated environmental factors that occur annually, such as fog, river flood stage, storms, ice, etc. <u>Why is this risk determination made for this category?</u></p> <p>No unusual environmental factors. Comments from local stakeholders raise concerns with Ward Cove's status as an EPA Superfunds site; however this is outside the scope and jurisdiction of the Coast Guard navigational safety assessment.</p>

Severe and sudden environmental factors	X		<p>Determination based on the location’s frequency of risk due to sudden and severe environmental factors such as hurricanes, flash floods, or tornados.</p> <p><u>Why is this risk determination made for this category?</u></p> <p>Earthquakes will occur in Alaska, but historically in Ketchikan they have not been significant enough to severely damage modern engineered structures. Comments from local stakeholders raise concerns with Ward Cove’s status as an EPA Superfunds site; however this is outside the scope and jurisdiction of the Coast Guard navigational safety assessment.</p>
Hydrological effects to Waterway	X		<p>Determination based on probability of hydrological issues having negative effects to proposed permit location and waterway (shoaling, standout, silting).</p> <p><u>Why is this risk determination made for this category?</u></p> <p>The National Oceanic and Atmospheric Administration (NOAA) performed a survey of Ward Cove in 2012. NOAA’s subsequent report advised caution in a “Shoal and Hazardous Features” section, and the subsequent findings and precautions are noted on NOAA Chart 17430, Note B and Note C: “Due to the profusion of logs on the sea floor, mariners are advised against anchoring.” No concerns were raised regarding standout or silting for the specific project location.</p>

OUTCOMES	<p>If low levels of risk are associated with each of the six criteria, support for the permit application should be considered.</p> <p>If high levels of risk are associated with any of the six criteria, an objection to the proposed project should be considered based on safety of navigation concerns.</p> <p><u>What steps were taken based on the risk assessment conducted?</u></p> <p>The construction of a vessel and barge lay-up facility will not negatively impact safe navigation in Ward Cove. The potential proposed cruise ship pier and cruise ship traffic could create traffic coordination challenges, but these will be the burden of vessel masters irrespective of their location on the waterway.</p> <p>The proposed cruise ship pier and cruise ships would occupy a large area in Ward Cove; however, adequate space would remain for reasonable clearance to facilitate safe navigation and access for other local stakeholders/neighboring docks. Although the area in question is sufficient to facilitate safe navigation, the permitting agency and local municipalities should give consideration to the stakeholder's environmental concerns relating to Ward Cove's status as an EPA Superfunds site.</p>
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