



May 7, 2019

The Honorable Lisa Murkowski
United States Senate
522 Hart
Washington, DC 20510

The Honorable Dan Sullivan
United States Senate
302 Hart
Washington, DC 20510

The Honorable Don Young
United States
House of Representatives
2314 Rayburn
Washington, DC 20515

Dear Senator Murkowski, Senator Sullivan and Representative Young:

I am writing on behalf of the Petersburg Borough Assembly to request your assistance in urging the Environmental Protection Agency (EPA) to develop harbor dredge spoil standards consistent with the soil conditions naturally present in Southeast Alaska.

As a fishing and maritime community, Petersburg and its residents are highly dependent on adequate and efficient harbors. Our North, Middle, and South Harbors are home to our commercial fishing fleet. Over the years, we have partnered with the Army Corps of Engineers to build and maintain our harbors. A few years ago, we worked with the Corps to dredge our North Harbor. We are now in the study phase of an effort to dredge the South Harbor. Separately, we are pursuing Department of Transportation funding for a port infrastructure project at Scow Bay. These projects are all vital to protecting our economic base and maintaining employment in the community.

The Borough would like to bring to your attention an issue that has complicated, delayed and increased the expense of these projects due to dredge spoil disposal standards. These are standards that the Army Corps implements based on EPA specifications and guidelines with which we are required to be in compliance. Those guidelines are derived from spoil surveys and baseline methodology EPA developed from the Puget Sound in the State of Washington. When our spoil is testing for

Borough Administration

PO Box 329, Petersburg, AK 99833 – Phone (907) 772-4425 Fax (907) 772-3759

www.petersburgak.gov

contaminants it is compared to baseline standards for dredge spoil located approximately 1,000 miles away. The use of the Puget Sound Dredge Disposal Analysis manual is also employed for other harbor and dock projects in Southeast Alaska.

Soil in our area contains naturally-occurring high levels of elements such as arsenic, chromium, copper, zinc and other metals due to substantial glacial rebound in the region. The levels of these elements exceed the Puget Sound standards, a region whose geology, environment, climate is substantially different from ours. As a result, the Borough could not dispose of the dredge spoil from North Harbor project in open water or for waterfront backfill, our two preferences and the most economical approaches. Instead, we had to load, truck and dispose of it at considerable expense, including construction of an \$800,000 containment dike, at our local landfill. Early soil sampling for our South Harbor project has determined that we will not be able to use the spoil for waterfront backfill, our preferred option, but may qualify for open water disposal. With the Scow Bay port infrastructure project in the works and other harbor projects in the future, the Puget Sound spoil standards present major impediments and project cost escalation.

We believe that the best solution to this problem is for EPA to develop a regional spoil standards manual based on Southeast Alaska soil characteristics. This approach would ensure that there would be "apples to apples" comparison when deciding dredge spoil disposal options for projects in Petersburg and elsewhere in the region. The development of a regional manual would take study, time and effort. A letter from the Delegation to the EPA Region 10 Administrator recommending the initiation of a regional soil disposal manual for Southeast Alaska would be greatly appreciated.

Thank you for consideration of this request.

Sincerely,

Mark Jensen
Mayor