



## PUBLIC NOTICE

Alaska Department of Environmental Conservation (DEC)  
Wastewater Discharge Authorization Program/§401 Certification  
555 Cordova Street, Anchorage AK9501-2617  
Phone: 907-269-6285 | Email: [DEC-401Cert@alaska.gov](mailto:DEC-401Cert@alaska.gov)

# Notice of Application for State Water Quality Certification

**Public Notice (PN) Date:** December 6, 2023  
**PN Expiration Date:** January 7, 2024

**PN Reference Number:** ER-23-01 v1.0  
**Waterway:** Akutan Harbor

Any applicant for a federal license or permit to conduct an activity that might result in a discharge into navigable waters, in accordance with Section 401 of the Clean Water Act (CWA) of 1977 (PL95-217), also must apply for and obtain certification from the Alaska Department of Environmental Conservation that the discharge will comply with the CWA, the Alaska Water Quality Standards, and other applicable State laws.

Notice is hereby given that a request for a CWA §401 Water Quality Certification of a Department of the Army Permit application, Corps of Engineers' PN Reference Number indicated above has been received for the discharge of dredged and/or fill materials into waters of the United States (WOUS), including wetlands, as described below, and shown on the project figures/drawings. The public notice and related project figures/drawings are accessible from the DEC website at <https://dec.alaska.gov/water/wastewater/>.

To comment on the project or request for a public hearing with respect to water quality, submit comments electronically via the DEC public notice site at <https://water.alaskadec.commentinput.com?id=NgmKbkeFZ> on or before the public notice expiration date listed above.

**Applicant:** USACE, Christopher Hoffman, CEPOA-PMC-E (Christopher Hoffman) P.O. Box 6898, JBER, AK 99506; (907) 753-5524; [Christopher.a.hoffman@usace.army.mil](mailto:Christopher.a.hoffman@usace.army.mil).

**Project Name:** Akutan Harbor Navigational Improvements

**Location:** The proposed activity is located within Section 1, T. 70S, R. 111W; Seward Meridian; in Aleutians East Borough, Alaska. Project Site (Latitude, Longitude): 54.14685, -165.62344. With potential discharge location(s) as follows: Dredging Activities to develop the harbor turning basin, navigation channel, and a construction access channel. 54.148983, -165.616821; Breakwater 54.148983, -165.616821; Temporary construction pad 54.148983, -165.616821, Dredged Material Placement Site 54.147579, -165.609258.

**Purpose:** The purpose is to identify feasible navigational improvements that provide for the safe, reliable, and efficient (cost-effective) transportation of passengers and cargo between the Akutan Airport on Akun Island and community of Akutan located on Akutan Island.

**Project Description:** The project intends to create a protected moorage for a ferry vessel that will transport people and cargo between the community of Akutan and its airfield on Akun Island. The recommended plan includes construction of a harbor in Surf Bay consisting of a 450-foot-long rubble-mound breakwater; a 120-foot by 120-foot mooring basin; and a -13-foot MLLW deep entrance channel. Also included in the project are a mooring basin and dolphins, pile-supported dock, a small pad for parking and freight loading/unloading, and a road connecting the pad to an area near the Surf Bay Inn.

Approximately 1.60 acres of surface area would be filled. Fill includes:

- Approximately 115,000 cubic yards (CYs) of terrestrial fill (coarse sand and gravel from on-island sources) for the construction of a temporary construction pad;

- Approximately 14,000 CYs of quarry rock (C- and B-rock and armor stone) for construction of the breakwater; and,
- Approximately 45,000 CYs of aggregate material for upland road construction.

There would also be dredging to develop the harbor turning basin, navigation channel, and access channel. Approximately 9,840 CYs of material would be dredged across 1.12 acres. The dredged material placement site would be located at approximately 54.147579, -165.609258.

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After reviewing the application, the Department may certify there is reasonable assurance the activity, and any discharge that might result, will comply with the CWA, the Alaska Water Quality Standards, and other applicable State laws. The Department also may deny or waive certification.

The permit application and associated documents are available for review. For inquires or to request copies of the documents, contact [dec-401cert@alaska.gov](mailto:dec-401cert@alaska.gov), or call 907-269-6285.

### **Disability Reasonable Accommodation Notice**

The State of Alaska, Department of Environmental Conservation complies with Title II of the Americans with Disabilities Act (ADA) of 1990. If you are a person with a disability who may need special accommodation in order to participate in this public process, please contact ADA Coordinator Megan Kohler at 907-269-4198 or TDD Relay Service 1-800-770-8973/TTY or dial 711 prior to the expiration date of this public notice to ensure that any necessary accommodations can be provided.



US Army Corps  
of Engineers®

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Integrated Feasibility Report  
and Environmental  
Assessment

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# Akutan Harbor Navigational Improvements Akutan, Alaska

----- Draft -----



June 2023

Draft Integrated Feasibility Report and Environmental Assessment

Akutan Harbor Navigational Improvements

Akutan, Alaska

Prepared By:

U.S. Army Corps of Engineers  
Alaska District

June 2023

# FINDING OF NO SIGNIFICANT IMPACT

## Akutan Harbor Navigational Improvements Akutan, Alaska

The U.S. Army Corps of Engineers, Alaska District (Corps) has conducted an environmental analysis in accordance with the National Environmental Policy Act of 1969, as amended. The final Integrated Feasibility Report and Environmental Assessment (IFR/EA) dated 23 June 2023, for the Akutan Harbor Navigational Improvements project addresses harbor opportunities and feasibility near Akutan, Alaska. The final recommendation is contained in the report of the Chief of Engineers, dated **DATE OF CHIEF'S REPORT**.

The Final IFR/EA, incorporated herein by reference, evaluated various alternatives that would improve navigation in the study area. The recommended plan is justified under the 2006 Section of WRDA 2007 (Remote and Subsistence Harbors) and includes:

- A harbor on Akun Island sized to accommodate a design vessel with a length of 58 feet and a draft of 8 feet. The 450-foot-long rubble mound breakwater would protect a 120-foot by 120-foot turning basin. Both the entrance channel and turning basin would have a dredge depth of -15.0 feet. It is anticipated that blasting would be required for the turning basin or entrance channel in this location. The entrance channel would have a minimum width of 60 feet to a maximum width of 120 feet when turning around the nose of the breakwater.

In addition to a “no action” plan, three alternatives were evaluated. The alternatives included dredging at three different locations and water depths in the same general area; two included blasting and one did not. Section 5 of the EA describes alternative formulation and selection. Nonstructural alternatives were considered but eliminated from detailed analysis. Some nonstructural alternatives would have resulted in environmental impacts.

For all alternatives, the potential effects were evaluated, as appropriate. A summary assessment of the potential effects of the recommended plan are listed in Table 1.

Table 1: Summary of Potential Effects of the Recommended Plan

	Insignificant effects	Insignificant effects as a result of mitigation*	Resource unaffected by action
Aesthetics	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Air quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Aquatic resources/wetlands	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Invasive species	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Fish and wildlife habitat	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Threatened/Endangered species/critical habitat	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Historic properties	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other cultural resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Floodplains	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Hazardous, toxic & radioactive waste	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hydrology	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Land use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Navigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Noise levels	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public infrastructure	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Socio-economics	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Environmental justice	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Soils	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tribal trust resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

All practicable and appropriate means to avoid or minimize adverse environmental effects were analyzed and incorporated into the recommended plan. Best management practices (BMPs) as detailed in the IFR/EA will be implemented, if appropriate, to minimize impacts. Mitigation for Threatened or Endangered species and noise levels includes industry standard stemming of charges and delays between charges to reduce the consequences of the confined underwater blasts. Impacts to Threatened and Endangered species are also mitigated by shutdown zones near the blast site to protect marine mammals from permanent injury or mortality. A discussion of mitigation measures is included in Section 8.7.

No compensatory mitigation is required as part of the recommended plan.

Public review of the draft IFR/EA and FONSI was completed on xxxx. All comments submitted during the public review period were responded to in the Final IFR/EA in Section 9.1 and FONSI. A 30-day state and agency review of the Final IFR/EA was completed on xxxx.

An Incidental Harassment Authorization under the Marine Mammal Protection Act (IHA) will be sought during the Preconstruction Engineering and Design (PED) phase for construction impacts to marine mammals from this project. A biological opinion will be

issued from the National Marine Fisheries Service and United States Fish and Wildlife Service to conclude consultation under section 7 of the Endangered Species Act of 1973, as amended, after the IHA process is concluded.

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, the U.S. Army Corps of Engineers determined that historic properties would be adversely affected by the recommended plan. The Alaska State Historic Preservation Office concurred with the determination on xxxx.

The State of Alaska does not currently have an active Coastal Zone Management Program. As of July 1, 2011, the CZMA Federal consistency provision no longer applies in Alaska. Federal agencies shall no longer provide the State of Alaska with CZMA Consistency Determinations or Negative Determinations pursuant to 16 U.S.C. 1456(c)(1) and (2), and 15 CFR part 930, subpart C.

The National Marine Fisheries Service provided concurrence that consultation under Section 305(b) of the Magnuson-Stevens Act Fishery Conservation Act and associated Essential Fish Habitat consultation has been satisfied.

Pursuant to the Clean Water Act of 1972, as amended, the discharge of dredged or fill material associated with the recommended plan has been found to be compliant with Section 404(b)(1) Guidelines (40 CFR 230). The Clean Water Act Section 404(b)(1) Guidelines evaluation is found in Appendix G of the IFR/EA.

A water quality certification pursuant to Section 401 of the Clean Water Act was obtained from the Alaska Department of Environmental Conservation. All conditions of the water quality certification shall be implemented in order to minimize adverse impacts to water quality.

Technical, environmental, economic, and cost effectiveness criteria used in the formulation of alternative plans were those specified in the Water Resources Council's 1983 Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies. All applicable laws, executive orders, regulations, and local government plans were considered in evaluation of alternatives. Based on this report, the reviews by other Federal, State, and local agencies, Tribes, input of the public, and the review by my staff, it is my determination that the recommended plan would not cause significant adverse effects on the quality of the human environment; therefore, preparation of an Environmental Impact Statement is not required.

**Date**

**JEFFREY S PALAZZINI  
Colonel, Corps of Engineers  
District Commander**



## EXECUTIVE SUMMARY

The Akutan Harbor Navigational Improvements Integrated Feasibility Report and Environmental Assessment (IFR/EA) was prepared under authority granted by Section 203 of the Water Resources Development Act (WRDA) of 2000, Tribal Partnership Program, as amended. Section 1156 of Water Resources Development Act 1986, Cost Sharing Provisions for the Territories, as amended, is applicable to this effort because of the 2014 amendment including tribes as eligible for this cost-share waiver. This study has a \$511,000 cost share waiver. The Project Partnership Agreement (PPA) will also be eligible for a cost-share waiver under Section 1156. This study also utilized the authority of Section 2006 of WRDA 2007, Remote and Subsistence Harbors, as amended. The Section 2006 authority states that the Secretary may recommend a project without demonstrating that the improvements are justified solely by National Economic Development (NED) benefits if the Secretary determines that the improvements meet specific criteria detailed in the authority. The Section 2006 provision allows for the recommendation of harbor navigation improvements based on long-term community viability benefits within the region served by the project. This study meets the Section 2006 criteria. The study is cost-shared in accordance with Section 203, as amended. Due to the need to obtain a letter of authorization (LOA) in Preconstruction Engineering and Design (PED), a policy exception for Marine Mammal Protection Act/Endangered Species Act (MMPA/ESA) is currently in progress.

The community of Akutan is located on Akutan Island in the eastern Aleutian Island chain, one of the Krenitzin Islands of the Fox Island group. It is 35 miles east of Unalaska, and 766 air miles southwest of Anchorage. Akutan is only accessible by air or boat. Due to the volcanic geography of Akutan Island, the Akutan Airport is located on Akun Island, approximately 7 miles northeast of the community of Akutan. Residents of and travelers to Akutan reach the community of Akutan via fixed-wing aircraft from Unalaska (Dutch Harbor) to the Akutan Airport, which is on neighboring Akun Island. They are then flown via helicopter to Akutan from Akun. The current transportation method (helicopter) between the Akutan Airport on Akun Island and the community of Akutan is expensive, inefficient, and unreliable, with consequences for transporting passengers and obtaining medical supplies, mail, and airline freight. Providing marine infrastructure to access the Akutan Airport at Akun Island would improve efficiency by providing direct access and moorage for a ferry vessel and by providing safer operations for the community of Akutan.

Nine preliminary sites were identified near Surf Bay on Akun Island that would provide access to the Akutan Airport: three at Nick's Camp, two at No-name Point, two at Darryl's Point, and two at Chulka Point. Subsequent screening resulted in two sites near No-name Point being carried forward for analysis. Three alternatives were developed at the two sites using identified structural and non-structural measures, in addition to the FWOP condition (No Action). NED analysis was conducted, but no NED plan was identified. Under Section 2006, the project delivery team (PDT) can utilize a Cost-Effectiveness/Incremental Cost Analysis (CE/ICA) to support plan selection. While

Access Capability is the optimal metric representing the opportunity for safe access at each alternative plan, the metric alone inadvertently assumes all alternatives provide a uniform level of benefits for that access. By this assumption, the nuances of benefits and their contribution to community viability are not fully captured within that metric. Multiple Criteria Decision Analysis (MCDA) is used to account for these OSE benefit intricacies. A focus group was conducted in October 2022 with key community members to inform the MCDA. The final criteria (which were subsequently weighted and scored to reflect the various alternatives impacts on long term community viability) included Health and Safety; Subsistence; Delivery of Essential Non-Medical Goods; Cultural Identity (non-food gathering traditional practices); Income opportunities; Community Growth and Expansion; Transportation Mode Preferences; Noise Pollution; and Local Vessel Access.

Alternative 2 was selected as the Tentatively Selected Plan (TSP) by the PDT at the TSP milestone in April 2023, and subsequently confirmed by the non-federal sponsors. Alternative 2 would consist of harbor sized to accommodate a design vessel with a length of 58 feet and a draft of 8 feet. The 450-foot-long rubble mound breakwater would protect a 120-foot by 120-foot turning basin. Both the entrance channel and turning basin would have a dredge depth of -15.0 feet. It is anticipated that blasting would be required for the turning basin or entrance channel in this location. The entrance channel would have a minimum width of 60 feet to a maximum width of 120 feet when turning around the nose of the breakwater. Local service facilities required would include a 290 foot long by 12-foot-wide pile-supported dock, 60 foot by 40-foot mooring basin with mooring dolphins, uplands with an area of approximately 0.15 acres for loading/unloading freight from dock, and a 1,100 foot long by 12-foot-wide road connecting the harbor areas with the existing pad to the south of the Surf Bay Inn.

Alternative 2 has a project first cost of \$56,926,000. The total National Economic Development cost, including the cost of operations and maintenance and interest during construction, is \$62,366,000. The average annual equivalent cost is \$2,199,000, with net annual NED benefits of \$(1,802,000)-\$(1,251,000). Using estimated costs for the TSP, the project's benefit-cost ratio is 0.18 – 0.43, with annual benefits of \$397,000 - \$948,000. In accordance with the Section 2006 Authority, the CE/ICA produced one best buy alternative (Alternative 2) for the project other than the No Action plan. Alternative 2 was also the highest-ranked alternative in the MCDA analysis and provided the most effective and complete approach to addressing the problem and objectives while also efficiently realizing the specified opportunities compared to cost and being environmentally acceptable.

## PERTINENT DATA

<b>TSP</b>	
Alternative 2: Harbor South of No-name Point (With Blasting)	
GNF Dredge Volume	9,400 CY
LSF Dredge Volume	440 CY
Total Dredge Volume	9,840 CY
LSF Road Excavation Volume	45,000 CY

<b>Economics</b>	
<b>Item</b>	<b>Total (\$)</b>
Total Average Annual Equivalent Cost	\$2,199,000
Total Average Annual Equivalent Benefit	\$397,000-\$948,000
Net Annual National Economic Development Benefits	\$(1,802,000) - \$(1,251,000)
Benefit-Cost Ratio	0.18-0.43
OSE – CE/ICA Result	Best Buy
OSE – MCDA Rank	1
<small>Note: October 2022 Price (FY23) level, 50-Year Period of Analysis, 2.50 Percent Discount rate. Costs and benefits in this table are based on the cost estimate for the TSP and differ slightly from the costs and benefits used for plan evaluation and comparison.</small>	

<b>Cost-Share Initial Calculations for Akutan Harbor Navigational Improvements Tentatively Selected Plan (Alternative 2)</b>			
	<b>Total</b>	<b>Federal</b>	<b>Non-Federal</b>
General Navigation Features (GNF)	\$41,061,300	\$36,955,200	\$4,106,100
Pre-construction Engineering /Design	\$2,053,100	\$1,847,800	\$205,300
Construction Management	\$3,079,600	\$2,771,600	\$308,000
Total GNF	\$46,194,000	\$41,574,600	\$4,619,400
Section 1156 Waiver	\$0	\$665,000	-\$665,000
Adjusted for 1156 Waiver	\$46,194,000	\$42,239,600	\$3,954,400
TPP Ability to Pay Adjustment	\$0	\$2,965,800	-\$2,965,800
Adjusted GNF Cost Share	\$46,194,000	\$45,205,400	\$988,600
Real Estate Requirements for GNF	\$100,000	0	\$100,000
<b>Total First Cost</b>	<b>\$46,294,000</b>	<b>\$45,205,400</b>	<b>\$1,088,600</b>
Additional 10% of GNF Less Real Estate Credit	\$0	-\$4,519,400	\$4,519,400
TPP Ability to Pay Adjustment	\$0	\$3,389,600	-\$3,389,600
<b>Adjusted Adtl. 10% of GNF Less Real Estate Credit</b>	<b>\$0</b>	<b>-\$1,129,800</b>	<b>\$1,129,800</b>
Aids to Navigation	\$0	\$0	\$0
Local Service Facilities	\$10,731,600	\$0	\$10,731,600
<b>Total Cost Share</b>	<b>\$57,025,600</b>	<b>\$44,075,600</b>	<b>\$12,950,000</b>

\* There are differences in the total costs shown in this table and the values displayed in the economic analysis due to some costs that were not available when the economic analysis was completed, i.e. real estate costs, etc. These cost differences are not anticipated to impact plan selection.

\* 1156 amount changes annually. The actual amount of the waiver is dependent upon the year the agreement is executed.

## LIST OF ACRONYMS AND ABBREVIATIONS

ADEC	Alaska Department of Environmental Conservation
ADM	Agency Decision Milestone
AEP	Annual Exceedance Probability
AHRS	Alaska Heritage Resources Survey
AK	Alaska
AKDOT&PF	Alaska Department of Transportation and Public Facilities
AMNWR	Alaska Maritime National Wildlife Refuge
ANCSA	Alaska Native Claims Settlement Act
APE	Area of Potential Effect
APICDA	Aleutian Pribilof Island Community Development Association
ASA (CW)	Assistant Secretary of the Army, Civil Works
ATR	Agency Technical Review
BMPs	Best Management Practices
BOEM	Bureau of Ocean Energy Management
BSAI	Bering Sea Aleutian Islands
CAA	Clean Air Act
CDQ	Community Development Quota
CE/ICA	Cost Effectiveness/Incremental Cost Analysis
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CSRA	Cost Schedule Risk Analysis
CY	Cubic Yards
CZMA	Coastal Zone Management Act
DPR	Detailed Project Report
DPS	Distinct Population Segment
DQC	District Quality Control
EEZ	Exclusive Economic Zone
EFH	Essential Fish Habitat
EA	Environmental Assessment
ER	Engineer Regulation
ERDC	Engineer Research and Development Center
EQ	Environmental Quality
ESA	Endangered Species Act
FCSA	Feasibility Cost Share Agreement
FEMA	Federal Emergency Management Agency
FMP	Fishery Management Plan
FONSI	Finding of No Significant Impact
ft	Feet
FWCA	Fish and Wildlife Coordination Act
FWCAR	Fish and Wildlife Coordination Act Report
FUNWAVE	Fully Nonlinear Boussinesq Wave Model
GMSL	global mean sea level

GNF	General Navigation Features
HABS	Historical American Building Survey
H&H	Hydraulics and Hydrology
HQ	Headquarters
IDC	Interest During Construction
IDQ	Individual Development Quota
IEPR	Independent External Peer Review
IFQ	Individual Fishing Quota
IHA	Incidental Harassment Authorization
IPCC	Intergovernmental Panel on Climate Change
IPR	In-progress review
IWR	Institute for Water Resources
LAT	Lowest Astronomical Tide
LERR	Lands, Easements, Rights-of-Way, and Relocations
LOA	Letter of Authorization
LRR	Limited Reevaluation Report
LSF	Local Service Facilities
MHHW	Mean Higher High Water
MHW	Mean High Water
MLLW	Mean Lower Low Water
MLW	Mean Low Water
MMPA	Marine Mammal Protection Act
MOA	Memorandum of Agreement
MSL	mean sea level
MTL	mean tide level
NASA	National Aeronautics and Space Administration
NED	National Economic Development
NEPA	National Environmental Policy Act
NFS	Non-Federal Sponsor
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NMS	National Marine Sanctuary
NOAA	National Oceanic and Atmospheric Administration
NOS	National Ocean Service
NPS	National Park Service
NRC	National Research Council
NRHP	National Register of Historic Places
OMRR&R	Operations, Maintenance, Repair, Replacement, and Rehabilitation
OSE	Other Social Effects
PA	Programmatic Agreement
PCX	Planning Center of Expertise
PDT	Project Delivery Team
PED	Preconstruction Engineering and Design

POA	Pacific Ocean Alaska (Alaska District)
POD	Pacific Ocean Division
R	Republican
RED	Regional Economic Development
ROM	Rough Order Of Magnitude
RSLC	Relative Sea Level Change
S&A	State And Agency
SAV	Submerged Aquatic Vegetation
SHPO	State Historic Preservation Officer
SLC	Sea Level Change
TPCS	Total Project Cost Summary
TSP	Tentatively Selected Plan
U.S.	United States
USACE	United States Army Corps of Engineers
USEPA	Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VLM	Vertical Land Movement
WRDA	Water Resources Development Act
WRRDA	Water Resources Reform and Development Act

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## **APPENDICES**

Appendix A: Hydraulics & Hydrology

Appendix B: Geotechnical

Appendix C: Economics

Appendix D: Cost Engineering

Appendix E: Real Estate

Appendix F: Environmental



## **1.0 INTRODUCTION**

This Akutan Harbor Navigational Improvements Integrated Feasibility Report and Environmental Assessment (IFR/EA) documents the United States Army Corps of Engineers (USACE) study planning and decision process for recommended navigational improvements for Akutan, Alaska and documents compliance with the National Environmental Policy Act (NEPA) in the planning process.

The focus of this study is to identify a feasible solution that provides safe, reliable, and efficient (cost-effective) marine navigation and mooring for passengers and cargo between the Akutan Airport on Akun Island and the community of Akutan located on Akutan Island. The Native Village of Akutan (Tribe) and the Aleutians East Borough (Borough) are the cost-sharing, non-federal sponsors (NFS) of the feasibility study. The Feasibility Cost Sharing Agreement (FCSA) was executed on 21 July 2021. Henceforth in this study, NFS refers to both signatories unless otherwise specified.

### **1.1 USACE Planning Process**

The USACE Civil Works planning process follows a standard approach to identifying and evaluating potential water resource solutions to ensure potential federal projects comply with applicable laws and guidance. The 1983 Economic and Environmental Principles and Guidelines for Water and Related Land Implementation Studies (Principles and Guidelines, or P&G) provide guiding principles for the USACE planning process. Engineer Regulation (ER) 1105-2-100 Planning Guidance Notebook and the Planning Manual Part II: Risk-Informed Planning lay out an iterative planning process used for all USACE Civil Works studies in developing and evaluating alternative plans (IWR 2017).

The iterative six-step USACE planning process is outlined in the P&G and ER 1105-2-100 and was modified by the Planning Manual Part II into a risk-informed planning process. The six steps include identifying water resource problems and opportunities (Step 1), inventory and forecast of existing and future conditions (Step 2), plan formulation (Step 3), plan evaluation (Step 4) and comparison (Step 5), and finally plan selection (Step 6), with evidence gathering, risk management, and stakeholder involvement as taking place throughout the process.

### **1.2 Project and Study Authority**

Section 203 of the Water Resources Development Act (WRDA) of 2000, Tribal Partnership Program, as amended, provides authority for the U.S. Army Corps of Engineers (USACE) in cooperation with Indian tribes and heads of other federal agencies to study and determine the feasibility of carrying out projects that will

substantially benefit Indian tribes and are located within Indian country or within proximity to Alaska Native villages. The provision states:

*(a) Definition of Indian Tribe.--In this section, the term "Indian tribe" has the meaning given the term in section 4 of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450b).*

*(b) Program.--*

*(1) In general.--In cooperation with Indian tribes and the heads of other Federal agencies, the Secretary may study and determine the feasibility of carrying out water resources development projects that--*

*(A) will substantially benefit Indian tribes; and*

*(B) are located primarily within Indian country (as defined in section 1151 of title 18, United States Code) or in proximity to Alaska Native villages.*

*(2) Matters to be studied.--A study conducted under paragraph (1) may address--*

*(A) projects for flood damage reduction, environmental restoration and protection, and preservation of cultural and natural resources; and*

*(B) such other projects as the Secretary, in cooperation with Indian tribes and the heads of other Federal agencies, determines to be appropriate.*

*(c) Consultation and Coordination With Secretary of the Interior.--*

*(1) In general.--In recognition of the unique role of the Secretary of the Interior concerning trust responsibilities with Indian tribes and in recognition of mutual trust responsibilities, the Secretary shall consult with the Secretary of the Interior concerning studies conducted under subsection (b).*

*(2) Integration of activities.--The Secretary shall--*

*(A) integrate civil works activities of the Department of the Army with activities of the Department of the Interior to avoid conflicts, duplications of effort, or unanticipated adverse effects on Indian tribes; and*

*(B) consider the authorities and programs of the Department of the Interior and other Federal agencies in any recommendations concerning carrying out projects studied under subsection (b).*

*(d) Cost Sharing.--*

*(1) Ability to pay.--*

*(A) In general.--Any cost-sharing agreement for a study under subsection (b) shall be subject to the ability of the non-Federal interest to pay.*

*(B) Use of procedures.--The ability of a non-Federal interest to pay shall be determined by the Secretary in accordance with procedures established by the Secretary.*

*(2) Credit.--The Secretary may credit toward the non-Federal share of the costs of a study under subsection (b) the cost of services, studies, supplies, or other in-kind contributions provided by the non-Federal interest if the Secretary determines that the services, studies, supplies, and other in-kind contributions will facilitate completion of the study.*

*(e) Authorization of Appropriations.--There is authorized to be appropriated to carry out subsection (b) \$5,000,000 for each of fiscal years 2002 through 2006, of which not more than \$1,000,000 may be used with respect to any 1 Indian tribe.*

### **1.2.1 Additional Study Guidelines**

Section 2006 of WRDA 2007 as amended provides for project justification to be pursued for Remote and Subsistence Harbors if certain criteria are met and sufficient NED benefits for project justification are not identified. The Remote and Subsistence Harbors authority specifically states that in conducting a study of harbor and navigation improvements, the Secretary may recommend a project without demonstrating that the improvements are justified solely by NED benefits if the Secretary determines that the improvements meet specific criteria detailed in the authority. The following are the criteria outlined in the authority:

1. The community to be served by the improvements is at least 70 miles from the nearest surface accessible commercial port and has no direct rail or highway link to another community served by a surface accessible port or harbor; or the improvements would be located in the State of Hawaii or Alaska, the Commonwealth of Puerto Rico, Guam, the Commonwealth of the Northern Mariana Islands, the United States Virgin Islands; or American Samoa;

*Akutan is located in the State of Alaska.*

2. The harbor is economically critical such that over 80% of the goods transported through the harbor would be consumed within the region served by the harbor and navigation improvement, as determined by the Secretary, including consideration of information provided by the non-Federal interest; and

*The project meets this criterion. The community that is to be served by the navigation improvements is Akutan, Alaska. Based upon weight, commodities transported in the future with-project condition were analyzed to determine that over 80 percent of the goods transported through the harbor (after construction) would be consumed within the community. Cargo is delivered by the fixed-wing aircraft between Dutch Harbor and Akun, and then carried on the helicopter between Akun and Akutan. Most of the mail and light freight transported by the helicopter goes into the community and supports the day-to-day needs of Akutan, with a much smaller percentage being transported away from the community (mostly consisting of USPS mail). Over 90 percent of the combined mail and light freight from 2018-2021 was delivered to the community for use, with less than 10 percent (by weight) utilized elsewhere. This analysis is located in Appendix C: Economics.*

3. The long-term viability of the community in which the project is located, or the long-term viability of a community that is located in the region that is served by the project and that will rely on the project, would be threatened without the harbor and navigation improvement.

*The project meets this criterion. Remote Alaska communities face challenges that are complex and multifaceted. Rural economies in Alaska, including Akutan, can be characterized as mixed subsistence-cash economies in which the subsistence and cash sectors are interdependent and mutually supportive. Higher costs of living, limited cash employment, and unreliable and expensive transportation are challenges the village faces daily. Transportation and access issues identified within the community that impact long-term community viability in many ways include health and safety, subsistence, delivery of essential non-medical goods, cultural identity (non-food gathering traditional practices), income opportunities, community growth and expansion, transportation mode preferences, noise pollution, and local vessel access. A safe and functioning harbor improves access to transportation in and out of the community and addresses issues related to community viability. While the resident population appears stable, limitations of access to the transportation network (including both passenger and mail/light freight services) threatens long-term viability. Reductions in the costs of such basic essential goods are essential to community viability. The high cost and unreliable nature of transportation to/from Akutan could become a barrier to long term viability. This analysis is located in Appendix C: Economics.*

Compliance with the criteria of the authority has been confirmed by a USACE Vertical Team.

In addition, the Remote and Subsistence Harbors authority also notes that while determining whether to recommend a project under the criteria above, the Secretary will consider the benefits of the project to the following:

- Public health and safety of the local community and communities that are located in the region to be served by the project and that will rely on the project, including access to facilities designed to protect public health and safety.
- Access to natural resources for subsistence purposes.
- Local and regional economic opportunities.
- Welfare of the local population; and
- Social and cultural value to the local community and communities that are located in the region to be served by the project and that will rely on the project.

As indicated above, navigation improvements for Akutan meet all the above criteria to recommend a project.

### **1.3 Scope of the Study**

This study evaluates the feasibility and environmental effects of implementing navigation improvements for Akutan, Alaska.

### **1.4 Study Location**

Lying between Unimak Island and Unalaska Islands, Akutan and Akun Islands are part of the chain of rugged, volcanic Aleutian Islands stretching westward from the tip of the Alaska Peninsula at False Pass towards the Russian coast. Akutan is approximately 763 miles from Anchorage and 35 miles northeast of Dutch Harbor on Unalaska Island (Figure 1).

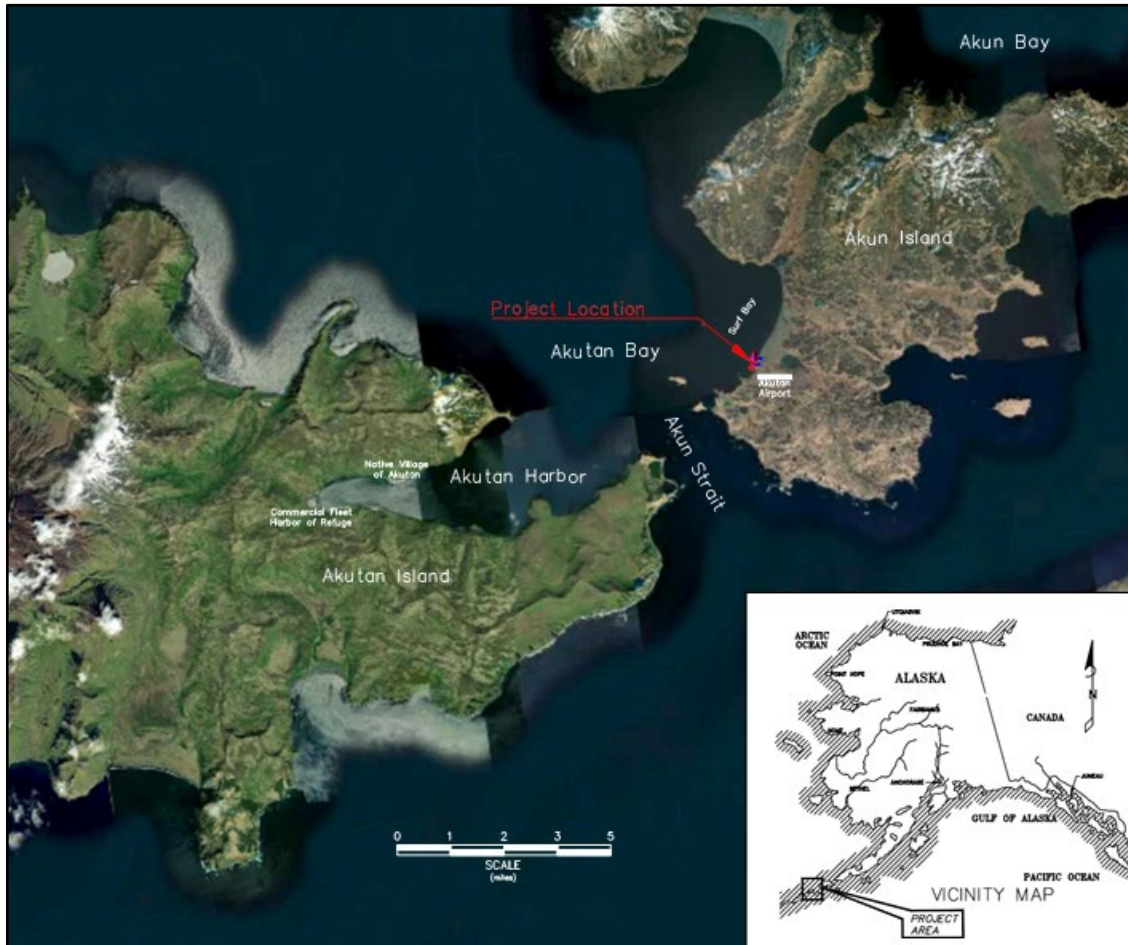


Figure 1. Location of Akutan and Akun Islands, Alaska

Akutan Island is approximately 18 miles long and 13 miles wide, with an area of 129 square miles. Akutan Harbor is a glacially formed body of water about 3.9 miles long and approximately 1.8 miles wide at its mouth, narrowing to about 0.6 miles at its head. Akutan Harbor is a large and naturally deep with a relatively flat bottom and accommodates large vessels, including floating processors, and large container and cargo ships that service both Akutan residents as well as a large adjacent shore-based seafood processing facility. The head of the harbor is a flat valley with a gradually increasing slope, while the northern and southern shorelines are rocky and steep. The inner portion of the harbor is substantially sheltered from incoming Bering Sea swell, and the island's active volcano that blocks much of the prevailing easterly winds of the Aleutian Islands. Akutan Harbor opens to Akutan Bay and Akun Strait to the east. A small boat harbor also locally referred to as Akutan Harbor is located at the west terminus of the Akutan Harbor body of water. A road connecting the community of Akutan to the Akutan Harbor has been funded and designs have been developed. Permitting for the road is underway with materials to be stockpiled in 2023 and construction to be completed in 2024.

The community of Akutan is located on the eastern side of Akutan Island on the north side of Akutan Harbor, on a flat piece of land with the steep slope of a mountain rising behind the village, confining the community to a small geographic area (Figure 2).



Figure 2. Community location on Akutan Island (includes the City of Akutan and the Native Village of Akutan)

Akun Island is a large, comparatively flat island that lies immediately northeast of Akutan Island and has a land area of 64 square miles. It is 14.0 miles long and 11.3 miles wide. The Akutan Airport is located adjacent to Surf Bay, which opens to the Bering Sea to the northwest and is approximately 7 miles to the east of the community of Akutan (Figure 3).



Figure 3. Study location on Akun Island

### 1.5 Congressional District

The study area is in the Alaska Congressional District with the following delegation: Senator Lisa Murkowski (R); Senator Dan Sullivan (R); and Representative Mary Peltola (D).

### 1.6 Non-Federal Sponsor

The Native Village of Akutan (Tribe) and Aleutians East Borough (AEB) are the non-Federal Sponsors for this Study. The Native Village of Akutan is a Federally Recognized Tribe. The Feasibility Cost Share Agreement (FCSA) was signed on 19 July 2021.

### 1.7 Key Stakeholders

Although there are multiple stakeholders in the proposed project area, the key stakeholders are identified as the Native Village of Akutan, Akutan Native Corporation, the Aleutians East Borough, the City of Akutan, and USACE (Figure 4).



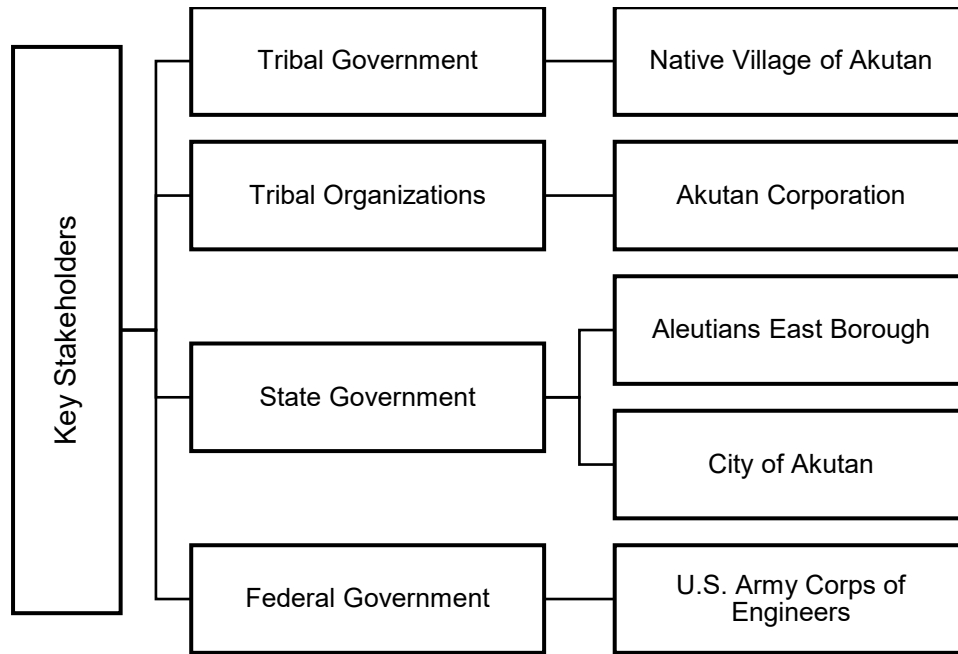


Figure 4. Overview of key stakeholders

The Native Village of Akutan is the Federally Recognized Tribe and local tribal government for the community of Akutan, a primarily Unangan village with a permanent population of about 100 persons. The Tribe has responsibility for specific local health and social service programs. The Native Village of Akutan was first formed under the Alaska amendments of the Indian Reorganization Act (IRA) of 1934.

The Akutan Corporation is a for-profit Alaska Native village corporation formed under Section 8 of the Alaska Native Claims Settlement Act (ANCSA). In 1971, ANCSA was passed and, with the exception of land patented by the State of Alaska under the Statehood Act of 1959, all land in the Akutan area was available for selection from the federal government. Under ANCSA, the Akutan Corporation became a major landholder in the area with 92,160 acres of land selections. The lands selected by the Akutan Corporation include portions of Akutan and Akun Islands, as well as several of the smaller neighboring islands. By 1983, 89,773 of these acres had been conveyed. Some lands in and around Akutan have been conveyed from the corporation to other landowners including the City of Akutan and private individuals.

Aleutians East Borough is a 2nd class borough in the State of Alaska. As of the 2020 census the borough's population was 3,420. Communities located within the borough include: Akutan, Cold Bay, False Pass, King Cove, Nelson Lagoon, and Sand Point. The borough seat is Sand Point. The borough's economy is cash-based. Commercial fishing and fish processing dominate and occur almost year-round. Sand Point is home to the largest fishing fleet in the Aleutian Chain. Salmon and Pacific cod processing occur at King Cove, Sand Point, Akutan and False Pass. The Trident plant in Akutan is

the largest walleye pollock processing plant in the State. Transportation and other services provide year-round employment.

The City of Akutan (City) is the local government for the community of Akutan and was incorporated in 1979. The City provides municipal facilities and utilities such as piped water and sewer, electric, refuse collection, volunteer fire department, two harbors, a library and museum, and state-funded Village Public Safety Officer. The incorporated boundaries of the City encompass Akutan Harbor and its uplands for an area of approximately 130 square miles, including approximately 25 square miles on Akutan Island, 27 square miles on Akun Island, and 77 square miles of submerged lands.

USACE is a Federal agency within the Department of Defense.

Other important Stakeholder Organizations in the region include:

- Aleutian Pribilof Island Association (APIA) - APIA contracts with federal, state and local governments and secures private funding to provide a broad spectrum of services throughout the region. These services include health, education, social, psychological, employment and vocational training, and public safety services.
- Aleutian Pribilof Island Community Development Association (APICDA) - APICDA is a non-profit dedicated to strengthening local economies and building infrastructure to support commerce in six remote villages in the Aleutian-Pribilof region of Alaska.
- Aleutians East Tribes (EAT) - Eastern Aleutian Tribes provides Medical, Dental, and Behavioral Health services in federally qualified health centers in the Alaskan communities of Adak, Akutan, Cold Bay, False Pass, King Cove, Nelson Lagoon, and Sand Point.
- Aleut Corporation - The Aleut Corporation was incorporated on June 21, 1972, as one of the 12 Alaska Native Regional corporations established under ANCSA.
- Trident Seafoods (Trident) - Trident Seafoods is the largest seafood company in the United States, harvesting primarily wild-caught seafood in Alaska. Trident manages a network of catcher and catcher processor vessels and processing plants across twelve coastal locations in Alaska. Their plant in Akutan is the largest single fish processing plant by volume in the United States.
- United States Fish and Wildlife Service (USFWS) – Alaska Maritime National Wildlife Refuge (AMNWR) - The Alaska Maritime National Wildlife Refuge, managed by the USFWS, stretches from the volcanic islands of the Aleutian chain to the Inside Passage, and north to the Chukchi Sea, providing essential habitat

for marine mammals and some 40 million seabirds representing more than 30 species.

For the purposes of this report, the term “community of Akutan” is used to refer collectively to the Native Village of Akutan, the City of Akutan, and other entities located on the northern shore of Akutan Harbor.

### 1.8 Alaska Tribal Communities

The Indigenous peoples of Alaska occupy all regions of the state. Today “Alaska Native” is the accepted general term for the indigenous peoples of Alaska (Williams 2009). Alaska Natives have occupied the landscape and traditionally used the land and marine resources for more than 10,000 years. Traditional knowledge, oral histories, and archaeological evidence tell of cultural continuity, diversity, and complex and resilient history. Today there are 20 different Alaska Native languages and approximately 50 different dialects spoken in the state. The 229 Federally recognized tribes in Alaska represent eight broad cultural groups: Athabascan, Tlingit/Haida/Tsimshian, Siberian Yupik, Yup'ik/Cup'ik/Yupiaq, Iñupiaq, Alutiiq/Sugpiaq, Unangax, and Eyak (Williams 2009). The majority of these Federally recognized tribes reside in more than 200 Alaska Native villages (Figure 5). Alaska Natives make up nearly 20% of the total population of Alaska.



Figure 5. A Map of Federally Recognized Tribes in Alaska (BIA 2016)

No treaties exist between Alaska Natives and the United States (U.S.) government. The U.S. purchased what is now the State of Alaska from Russia in the 1867 Treaty of Cession. It is characterized as a “quit claim,” meaning that, where Alaska Natives held their lands by aboriginal title under Russian rule, their aboriginal possession continued under U.S. rule unless extinguished by treaty or subsequent Federal legislation (Case and Voluck 2012). Alaska Natives were granted U.S. citizenship in the Citizenship Act of 1924. It was not until the List Act of 1994 that the sovereign status of Alaska Native villages was Federally recognized, and Alaska Natives were definitively identified as members of “Indian tribes” under United States law (Case and Voluck 2012).

Alaska Native leaders participated in and helped guide the passage of ANCSA of 1971, seeking to maintain control over their traditional lands. ANCSA formally extinguished aboriginal and statute-based Alaska Native title, use, and occupancy rights to all lands in Alaska, except for the Metlakatla Indian Community Federal Reservation on Annette Island. Instead of aboriginal title, monies from the U.S. government and control of a percentage of Alaska Native traditional lands was transferred to Alaska Native Corporations formed under ANCSA. These two tiers of Alaska Native Corporations and the apportioned land was to be held collectively for the benefit of Alaska Natives.

The first tier of corporations created by ANCSA is the regional corporations. The Act divided Alaska into twelve geographic regions based on “common heritage” and created a thirteenth regional corporation (now defunct) for those Alaska Natives living outside of the state. Each regional corporation was required to incorporate under the laws of the State of Alaska as a for-profit business. The second tier of the corporate organization were local corporations associated with eligible Alaska Native villages. These village corporations were also required to incorporate as either for-profit or non-profit businesses. The majority chose to incorporate as for-profit corporations. Both regional and village corporations were entitled to select and hold land, with most village corporations holding fee title to surface estate only and regional corporations controlling both surface and subsurface estates (Case and Voluck 2012; Mitchell 2001). There are at least three types of Federally recognized Alaska Native governments: (1) traditional governing councils, (2) IRA governing councils, and (3) the Tlingit and Haida Central Council (Case and Voluck 2012).

As noted above in Section 1.7, the Native Village of Akutan is an IRA Council. As defined in the Indian Self-Determination Act of 1975, at least three different entities qualify as tribes: ANCSA regional corporations, ANCSA village corporations, and Federally recognized Native communities (Case and Voluck 2012). Additionally, the “twelve Native nonprofit associations... described in Section 7 of the Claims Act as ‘existing Native associations’... have been administratively determined to be tribal organizations... under the Indian Self-Determination Act” (Case and Voluck 2012). Only Federally recognized Native communities hold a government-to-government relationship with the Federal government.

## 1.9 Related Reports and Studies

**USACE 2019. Continuing Authorities Program Section 107 Akun Navigation Improvements Project Preliminary Fact Sheet.** This CAP 107 study preliminarily evaluated three alternative plans for harbor concepts at Akun Island in the small cove between No-name Point and a rocky outcrop. Completing this study was not warranted because no alternative could be completed under the CAP project limit. The non-Federal sponsor expressed interest in pursuing a General Investigations Study under the Tribal Partnership Program

**FAA 2007. FONSI and ROD for the Final Environmental Assessment for the Construction of a Land-Based Airport on Akun Island, Alaska.** This Federal Aviation Administration FONSI/ROD evaluated the impacts of construction of a land-based airport on Akun Island to serve the community of Akutan, Alaska.

**USACE 2004. Navigation Improvements, Akutan, Alaska. Interim Feasibility Report and Final Environmental Impact Statement.** This study examined the need for protective harbor at Akutan, Alaska. This study resulted in construction of the Akutan Harbor (small boat) at the head of the body of water called Akutan Harbor in 2012 and was not connected to any harbor options on Akun Island.

**Aleutians East Borough 2000. Preliminary Engineering Report for Akutan Harbor Access Road.** This report describes the engineering work for developing a preliminary engineering design for a coastal road about 2 miles long extending from the community of Akutan to the planned Akutan Harbor (eventually completed in 2012) located at the head of the body of water called Akutan Harbor.

## 2.0 PLANNING CRITERIA, PURPOSE AND NEED FOR PROPOSED ACTION

### 2.1 Problem

Before 2012, the community of Akutan was only accessible by boat or amphibious aircraft. An airport was opened on Akun Island (called Akutan Airport) in 2012 to provide a link between inhabitants of the community of Akutan and mainland Alaska. It was necessary to construct the airport on Akun Island as a suitable location was not available on Akun Island due to the mountainous topography of the island. Starting in 2012, the Aleutians East Borough committed to providing access between Akutan and the Akun Airport for a period of 20 years. A federal subsidy (Essential Air Service contract) also partially funds the operation of transportation between Dutch Harbor and the community of Akutan.

The Borough used a hovercraft to transport passengers between the community of Akutan and the Akutan Airport on Akun Island from the completion of the Akutan Airport in 2012 to early 2014. However, operation costs of the hovercraft exceeded \$4 million

annually and it was minimally effective due to wave threshold limitations. The annual helicopter service for transport of passengers and freight costs approximately \$2.3 million dollars per year which is heavily subsidized by both the Aleutians East Borough and Essential Air Service (see Section 3.4.1 Transportation for a description of current operations). The Borough believes that transport via a conventional marine vessel would be much less financially burdensome, but there are currently no marine docking facilities on Akun Island that would enable marine transport via a conventional marine vessel (AEB 2023).

### **2.1.1 Problem Statement**

The current transportation methods between the Akutan Airport on Akun Island and the community of Akutan are expensive, inefficient, and intermittently reliable. The lack of reliable vessel access and marine infrastructure limits transportation options between the Akutan Airport on Akun Island and the community of Akutan for passengers, medical supplies, and freight.

### **2.2 Purpose and Need**

The purpose is to identify feasible navigational improvements that provide for the safe, reliable, and efficient (cost-effective) transportation of passengers and cargo between the Akutan Airport on Akun Island and community of Akutan located on Akutan Island. The study will result in an Integrated Feasibility Report and Environmental Assessment (IFR/EA) which evaluates alternative plans based on economic, engineering, environmental, and cultural resource factors under the various authorities and guidelines referenced above.

### **2.3 National Objectives**

The Federal objective for water and related land resources project planning is to contribute to National Economic Development (NED) consistent with protecting the Nation's environment, pursuant to national environmental statutes, applicable executive orders, and other Federal planning requirements. Contributions to NED are increases in the net value of the national output of goods and services, expressed in monetary units.

In addition to NED benefits, a complete accounting, consideration and documentation of the total benefits of alternative plans across all benefit categories is required. Total benefits involve a summation of monetized and/or quantified benefits, along with a complete accounting of qualitative benefits, for project alternatives across national and regional economic, environmental, and social benefit categories.

### **2.4 Study Objectives**

The proposed project objectives are listed below:

- Provide sustainable, safe, reliable access to the community of Akutan over the 50-year period of analysis; and
- Improve transportation options for key services such as mail and medical supplies between the Akutan Airport on Akun Island and the community of Akutan over the 50-year period of analysis.

## **2.5 Opportunities**

The opportunities identified during the charrette to alleviate the problems described above are listed below:

- Reduce financial burden of operating cost on the non-Federal sponsor.
- Reduce dependence on Federal Subsidies to operate transportation system.
- Improve reliable delivery of mail and goods to and from Akutan.
- Reduce impacts to life safety and improve delivery of critical medical supplies.
- Reduce cost of living to the community of Akutan.
- Improve subsistence activities with additional navigation options.
- Increase population and settlement on Akun Island.
- Increase opportunity to study and learn about the marine and cultural environment.
- Facilitate potential expansion into the fresh seafood product market.
- Increase commerce in the region through improved transportation.

## **2.6 Study Constraints**

Planning Constraints. The universal constraints identified during the charrette included:

- Avoid or mitigate for the effects on Akun Island historic and cultural resources (impacts now are mainly from erosion).
- Avoid or mitigate for environmental resources and impacts.

A study-specific constraint that was identified during the charrette included the need to avoid negative impacts to subsistence opportunities associated with the only sockeye salmon stream on the west side of Akun Island. This stream flows near the former hovercraft landing area and hovercraft activities disrupted subsistence activities. In addition, there is concern that a harbor could create rockfish habitat that would increase the rockfish populations near the near the mouth of the stream or attract migrating juvenile salmon. The rockfish would then prey on the juvenile salmon migrating to the ocean which could lower adult salmon returns and the associated subsequent use of this resource.

## **2.7 National Evaluation Criteria**

Alternative plans should be formulated to address study objectives and adhere to study criteria. The Water Resources Council's Federal Principles and Guidelines document

establishes four criteria for the evaluation of water resources projects (WRC 1983). These criteria and their definitions are explained below.

### **2.7.1 Acceptability**

Acceptability is “the workability and viability of the alternative plan with respect to acceptance by State and local entities and the public and compatibility with existing laws, regulations, and public policies.”

### **2.7.2 Completeness**

Completeness is “the extent to which a given alternative plan provides and accounts for all necessary investments or other actions to ensure the realization of the planned effects. This may require relating the plan to other types of public or private plans if the other plans are crucial to realization of the contributions to the objective. “

### **2.7.3 Effectiveness**

Effectiveness is defined as “the extent to which an alternative alleviates the specified problems and achieves the specified opportunities.”

### **2.7.4 Efficiency**

Efficiency is “the extent to which an alternative plan is the most cost-effective means of alleviating the specified problems and realizing the specified opportunities, consistent with protecting the Nation’s environment.”

### **2.7.5 Study Specific Evaluation Criteria**

Study-specific screening criteria used to evaluate alternative measures included constructability, avoidance of constraints, completeness, first costs, and maintenance costs.

According to Section 2006, as amended, implementation guidance, if there is no NED plan and/or the selection of a plan other than the NED plan is based in part or whole on non-monetary units, the recommendation will be supported by a Cost-Effectiveness/Incremental Cost Analysis (CE/ICA). In addition, the Multiple Criteria Decision Analysis (MCDA) is used to account for benefit intricacies in the framework of CE/ICA. MCDA is a decision aiding tool and allows for analysis of multiple accounts.

The selection of criteria for the MCDA is based on key benefits that are non-monetary but support community viability and meet the planning objectives. The metric for this study and the results of the NED, CE/ICA, and MCDA analysis are presented in Section 6, “Comparison & Selection of Plans” as well as Appendix C: Economics.



## **3.0 BASELINE CONDITIONS**

### **3.1 Physical Environment**

Lying between Unimak Island and Unalaska Island, Akutan Island is a member of the chain of rugged, volcanic Aleutian Islands stretching westward from the tip of the Alaska Peninsula towards the Russian coast. Akutan Island is part of the Krenitzin Islands in the Fox Island Group.

Akutan and Akun Islands fall within the overarching boundary of the Alaska Maritime National Wildlife Refuge (AMNWR). Portions of its surface landmass are owned and managed by the U.S. Fish and Wildlife Service (USFWS) for conservation, protection, and the overall enhancement of fish, wildlife, plants, and their habitats for the continuing benefit of the American people. Akutan and Akun are difficult to access by airplane or boat due to the wave, wind, and fog climate of the Aleutian Islands/Bering Sea region.

#### **3.1.1 Climate**

Akutan has a maritime climate primarily influenced by strong low-pressure centers generated in the Bering Sea and western Pacific Ocean. The high frequency of cyclonic storms crossing the north Pacific and the Bering Sea are dominant factors in the weather at Akutan. These storms account for the persistent high winds and the frequent occurrences of low ceilings and low visibility. Cool summers, mild winters, and year-round rainfall characterize the climate. Snow falls primarily between November and April, with an average annual snowfall of 19.6 inches. Rains occur any time of the year, with an average annual precipitation of 79 inches. The wettest month is October, with a record of 13.4 inches and an average of 11.3 inches of precipitation. Fog is common during summer when the seas are calmer. Normal winter temperatures range within a few degrees above and below freezing (32 °F), and summer temperatures range from +45 °F to +60 °F. The lowest recorded temperature was -8 °F and highest recorded temperature was 72 °F at Dutch Harbor, 35 miles away. Wind summary data is available in Figure 6 (Windfinder 2023) with statistics based on observations taken between 06/2017 - 04/2023. Additional climate data is available in Appendix A: Hydraulics & Hydrology.

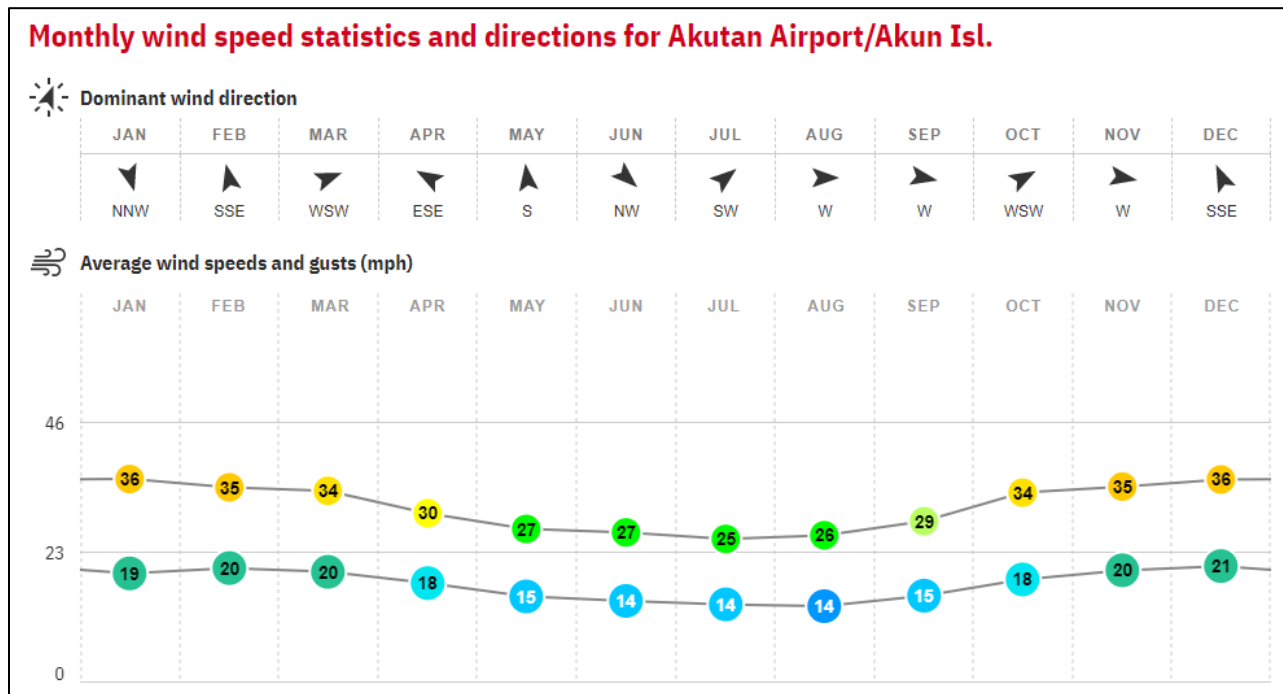


Figure 6. Wind summary data for Akutan Airport on Akun Island

Note: Observations taken between 06/2017 - 04/2023

### 3.1.2 Tides

Akun Island is in an area of semi-diurnal tides with two high waters and two low waters each lunar day. NOAA tide stations for Akutan were deployed for spring of 2009 and in Surf Bay (Akun Island) between 2008 to 2011. Surf Bay is the closest tidal station to the project area. The closest tidal station with long term data is 35 miles to the southwest at Unalaska (Figure 7), with over 68 years of data including lowest and highest observed water levels. Tides at Surf Bay range between +3.76 feet and 0.0 feet (Table 1).

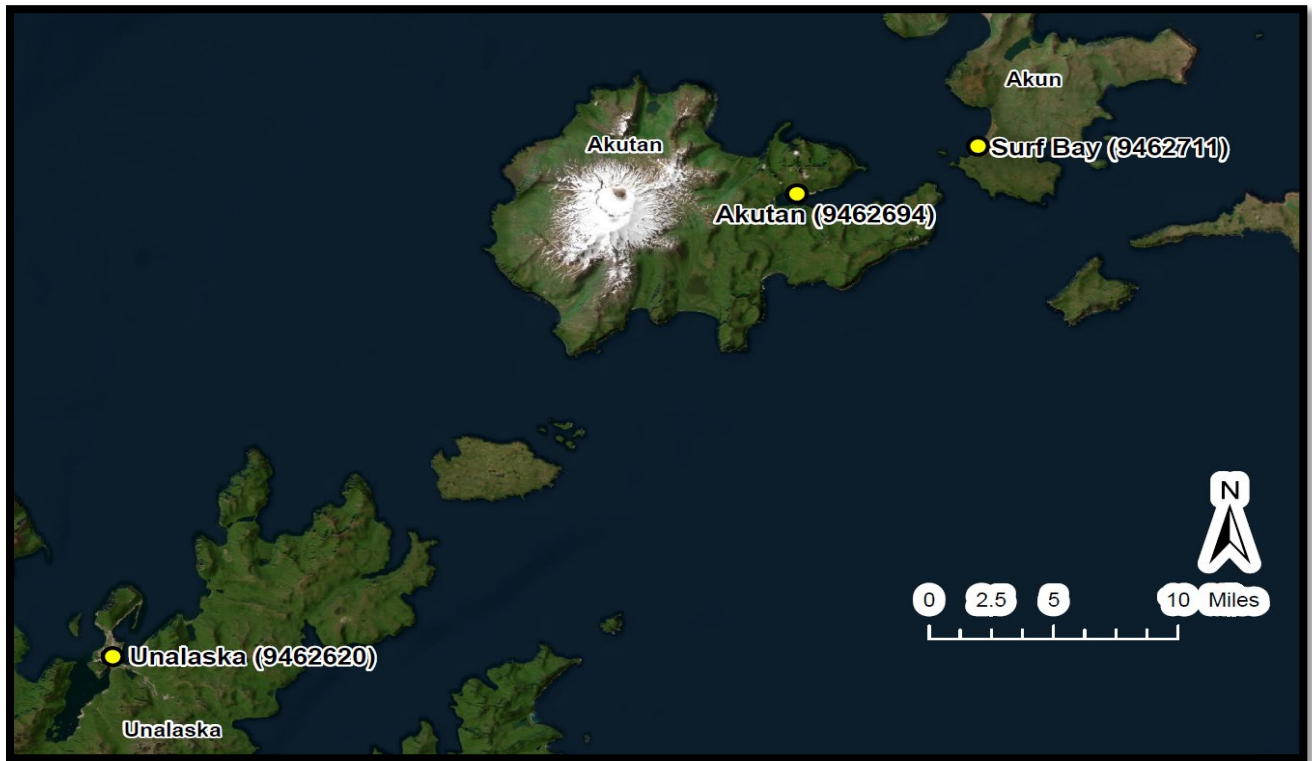


Figure 7. Location of NOAA Tide Stations (Yellow)

Table 1. NOAA Tide Station Data

	<b>Akutan</b>	<b>Surf Bay</b>	<b>Unalaska</b>
Station Number	9462694	9462711	9462620
Established	3/7/2009	7/15/2008	5/7/1955
Removed	5/1/2009	9/18/2011	N/A
	(Feet MLLW)		
Highest Observed Water Level	-	-	6.70
Mean Higher High Water (MHHW)	3.73	3.76	3.60
Mean High Water (MHW)	3.31	3.47	3.31
Mean Sea Level (MSL)	2.16	2.23	2.08
Mean Low Water (MLW)	0.93	1.00	0.93
Mean Lower Low Water (MLLW)	0.0	0.0	0.0
Lowest Observed Water Level	-	-	-2.78

### 3.1.3 Currents

Tidal currents are a significant consideration for small craft when transiting Akun Strait (Figure 8). NOAA Buoys measuring current were deployed near the project area during the summer of 2010, measuring a maximum current velocity of 0.8 knots at the Akutan Bay buoy and 7.5 knots at the Akun Strait buoy. Approximate flood (increasing) tide directions were  $340^{\circ}$  and  $350^{\circ}$  respectively, aligning as expected with the Akun Strait.



Figure 8. Akun Strait Currents and Project Study Area

### 3.1.4 Wave Climate

Akutan Bay is open to the Bering Sea to the north. Akun Strait gives access to the North Pacific (Gulf of Alaska) to the south, but Akun Strait is shoal and subject to strong currents. Refraction around Rootok Island (southwest of Akun Strait) and shoaling and wave breaking in Akun Strait prevent most of the wave energy generated in the Gulf of Alaska from penetrating into Akutan Bay but can cause a confused and severe breaking wave environment within Akun Strait. While these features protect Akutan Bay from Pacific swell from the south, it is subject to Bering Sea swell arriving from the north. Akutan Bay opens into Akutan Harbor extending along an east-west axis towards the west.

### 3.1.5 Sea Level Change

The Corps of Engineers requires that planning studies and engineering designs consider alternatives that are formulated and evaluated for the entire range of possible future rates of relative sea level change (RSLC). The 2013 USACE intermediate scenario is the preferred RSCL to be incorporated in project design.

The nearest tide station with the recommended 40-year period of record is at Unalaska (9462620), located approximately 35 miles southwest of the project site (Figure 9). Comparing tide data between Unalaska (9462620) and Surf Bay (9462711) earlier in the report indicate that the regions experience similar tides. A small rate of isostatic rebound, or the rising of land in response to the removal of the weight of glacial ice, is experienced across the Aleutians in both Akun and Unalaska. Therefore, the RSLC change results for Unalaska can be considered a good approximation for the proposed project area on Akun.

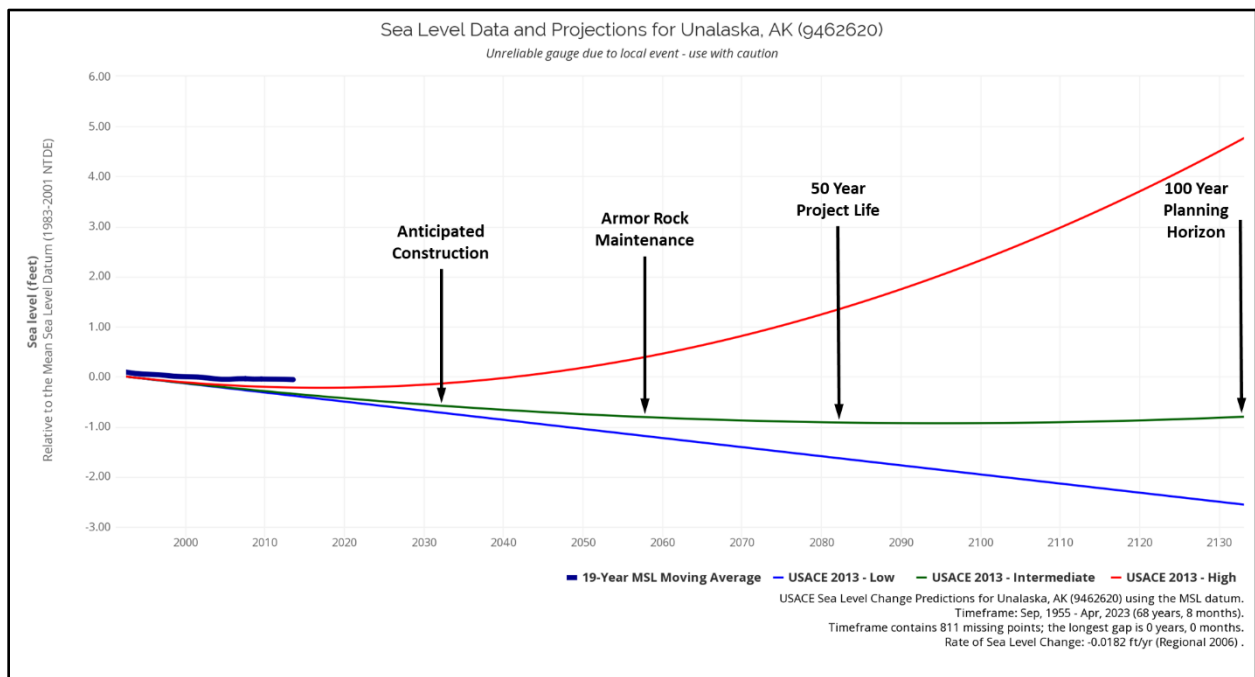


Figure 9. RSLC Projection Graphs for Unalaska

Low and intermediate sea level change estimates predict that the isostatic rebound rate will be greater than the sea level rise rate, resulting in an overall sea level drop between completion of construction in 2032 and the 50-year project life in 2082 (Table 2). The USACE high sea level change estimate predicts that the isostatic rebound rate will be less than the sea level rise rate. The intermediate RSCL of -0.92 feet was chosen for the project design. In order to maintain the project depth at year 50, one additional foot of dredging will be incorporated in the harbor and entrance channel design depths at construction.

Table 2. RSCL Projection Values for Unalaska

Year	Description	USACE Low	USACE Intermediate (Feet MLLW)	USACE High
1992	USACE RSLC Projection Begins	0.00	0.00	0.00
2032	Anticipated Construction	-0.73	-0.60	-0.14
2042	Maintenance Dredging	-0.91	-0.69	+ 0.02
2052	Maintenance Dredging	-1.09	-0.77	+ 0.24
2057	Armor Rock Maintenance	-1.18	-0.81	+ 0.38
2062	Maintenance Dredging	-1.27	-0.84	+ 0.54
2072	Maintenance Dredging	-1.46	-0.89	+ 0.92
2082	50 Year Project Life	-1.64	-0.92	+ 1.37
2132	100 Year Planning Horizon	-2.55	-0.81	+ 4.72

### 3.1.6 Water Levels

Water level is composed of tide, wave setup, storm surge, and relative sea level change. Different level determinations were used for breakwater design and harbor depth calculations. For breakwater design, the 2% annual exceedance probability (AEP) water level was chosen in order to design the appropriate breakwater length, crest height, crest width, and armor stone size for the 50-year design life. For entrance channel and turning and mooring basin design depths, the minimum water level was chosen that would provide ferry access during operation conditions.

The MHHW tide of 3.76 feet was used for the breakwater design, and MLLW tide of 0 feet for harbor depth calculations.

Wave setup is an increase in water level due to breaking waves in the surf zone. Any potential project located in Surf Bay would be located in water depths beyond the surf zone and influence of wave setup. Wave setup was not considered for water level determination.

Storm surge is an increase in water level due to low atmospheric pressure and wind driven transport of seawater over relatively large and shallow unobstructed waters. Storm surge can produce short term increases in water level considerably over normal tidal levels. Storm surge of 2.66 feet was used for breakwater design based on NOAA AEP curves at Unalaska, and 0 feet for harbor depth calculations.

The RSLC intermediate estimate predicts a change in water level of -0.92 feet over the 50-year design life of the project. RSLC at year 0, a value of 0 feet, was used for the

breakwater design. RSLC at year 50, a value rounded to -1 foot, was used for harbor depth calculations.

The total water level for breakwater design includes a MHHW tide of 3.76 feet, wave setup of 0 feet, storm surge of 3.66 feet, and a RSLC of 0 feet for a total of 6.42 feet MLLW. The 6.42 foot MLLW water level plus the 2% AEP wave of 30.0 feet was incorporated with the design wave in breakwater length, crest width, crest height, and stone size calculations.

The total water level for entrance channel and turning and mooring basin depths includes a MLLW tide of 0 feet, wave setup of 0 feet, storm surge of 0 feet, and a RSLC of -1 feet for a total of -1 foot MLLW, or 1 foot of depth. The water level of 1 foot plus ship factors such as squat and response to waves and safety clearance was used in harbor design depth calculations. See Appendix A: Hydraulics & Hydrology for further information on breakwater design and harbor depth calculations.

### **3.1.7 Bathymetry**

Surf Bay, on the Akun Island side of Akutan Bay and just north of Akun Strait, is an open bight exposed to the west and north (Figure 10). A group of rocky islets, the highest 64 feet, is in the middle of the bay about 1 mile from shore. A group of rocks, awash at low water, is 0.3 mile north of the islets, and irregular bottom, with least depth of 2¼ fathoms, is found 0.3-mile northwest of the rocks. The channel south of the islets is clear, and anchorage can be found in 10 fathoms, 0.4 mile from shore, with good shelter in south and east weather. On the east side of Surf Bay is a sand beach about 1 mile long.

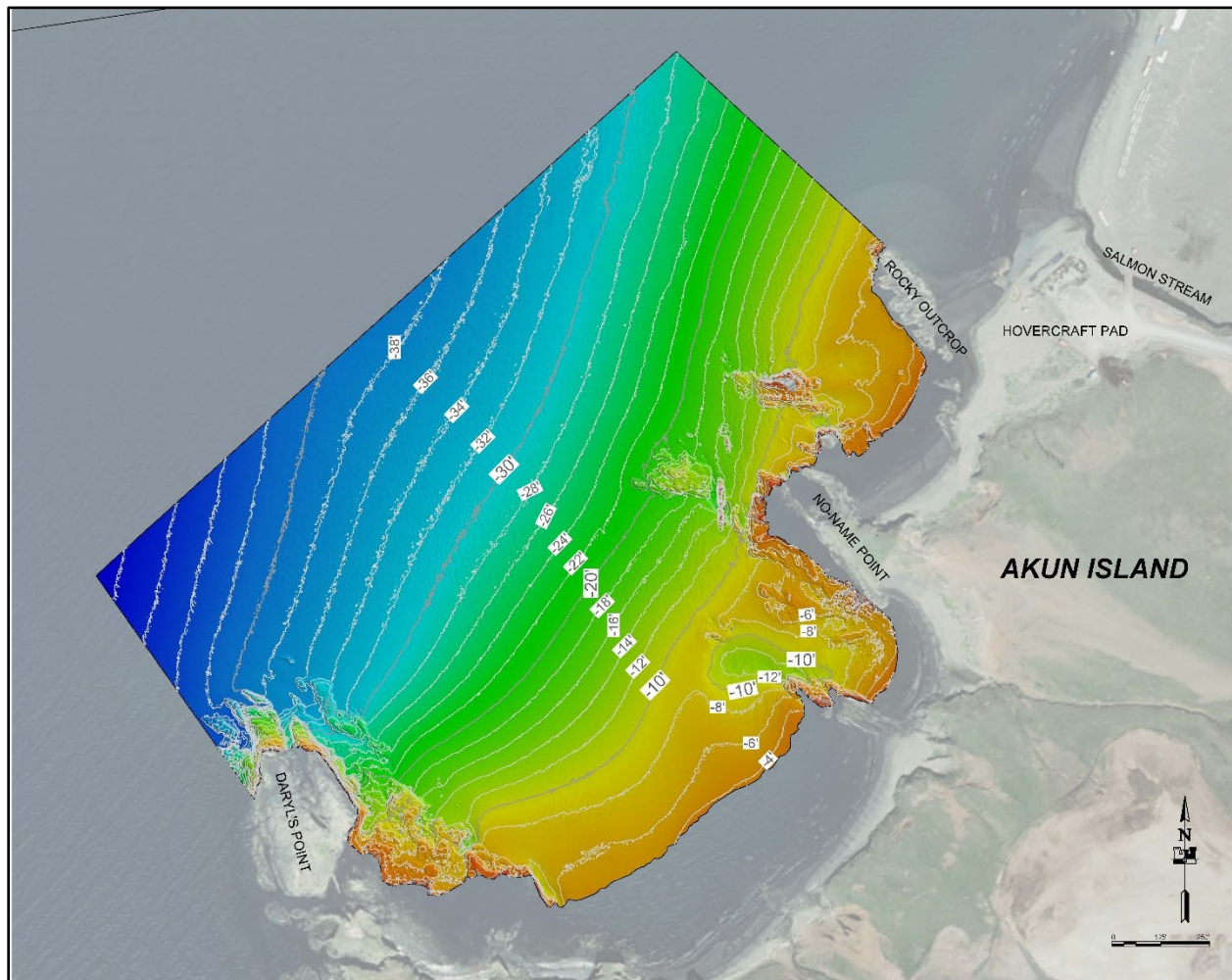


Figure 10. Bathymetry in the project area

### 3.1.8 Sediments

An offshore geophysical survey was conducted in August 2022 to investigate the thicknesses of sediment over bedrock within the area of proposed navigation improvements. General site conditions within the project area are expected to consist of a variable thickness of unconsolidated sediment overlying a harder layer interpreted to be bedrock. At some locations, the geophysical data also shows the presence of an intermediate strength layer below the sub-bottom elevation that could be weathered bedrock. Weak surficial sediment was not encountered, which is consistent with the relatively high-energy environment in Surf Bay.

Observations from a skiff in shallow water and underwater video indicate that the surface sediments at the harbor site alternatives are a mixture of sand and gravel with occasional rock reefs and outcrops. More information on the 2022 study as well as historical reports are discussed in Appendix B: Geotechnical.



### **3.1.9 Geology/Topography**

Akun Island is located within the Aleutian Islands, a volcanic island arc extending southwest from the Alaska Peninsula that separates the Bering Sea from the Pacific Ocean. The Aleutian Island arc is situated along the Aleutian subduction zone where the oceanic Pacific Plate is subducted beneath the continental North American plate, which results in a volcanic arc and high rates of seismicity. During the Pleistocene epoch, glaciation blanketed the Aleutian chain. At present, the Aleutian Islands often consist of steep volcanic slopes that descend directly into the sea and glacier-carved fjords. Glacial and volcanic deposits are commonly found concurrently in the Aleutian Island surficial geology, including glacial deposits in valley bottoms and ridge tops, and modern pyroclastic deposits such as air-fall ash and ash-flow tuff.

Akun Island is located approximately 7 miles east of the community of Akutan and approximately 35 miles northeast of Dutch Harbor and Unalaska. The Akutan Volcano, one of the most active volcanoes in the Aleutian Arc, sits on the western half of Akutan Island, and Mt. Gilbert Volcano is located approximately 5 miles north of the project site on Akun Island. Mt. Gilbert is a stratovolcano with massive basalt flows and thick pyroclastic deposits from modern and ancestral volcanic activity. Volcaniclastic debris flows and lahar deposits are found at the base of the volcanic slopes and in local valley bottoms.

### **3.1.10 Seismicity**

Akun Island, Alaska is located in a region of high seismicity typical of the Aleutian Islands due in part to the proximity to active faults. A detailed discussion of the seismicity in the project area can be found in the Geotechnical Appendix. Per the UFC 3-220-01 Geotechnical Engineering Section 2-1, the criteria for minimum factor of safety for liquefaction of risk category I & II structures is greater than or equal to 1.0, and for risk category III & IV structures greater than or equal to 1.1.

### **3.1.11 Geotechnical Conditions**

Geotechnical conditions in the project area were determined based on two historical geotechnical investigations and one geophysical survey in the vicinity. The investigations identified 20 to 60 feet of unconsolidated marine sediments (gravels and sands) overlying igneous bedrock. Details on the geotechnical conditions anticipated in the project area can be found in Geotechnical: Appendix B.

### **3.1.12 Water Quality**

The community of Akutan is located along Akutan Harbor. Akutan Harbor was originally listed on the ADEC 1996 Section 303 (d) list of impaired water bodies for settleable solids and low dissolved oxygen. Pollutant sources consist of seafood processing and waste. The ADEC prepared a water body assessment and total maximum daily load (TMDL) to address the water quality issues within this water body, and Trident

Seafoods' NPDES permit was amended to reflect this information. The harbor was removed from the Section 303(d) list in 1998 and remains as a Category 4a (impaired water with an established and EPA-approved TMDL) in ADEC's 2022 Integrated Water Quality Monitoring and Assessment Report (ADEC 2022).

There are no major water quality concerns for Surf Bay; however, introduced cattle on Akun Island cause substantial slope erosion and some of the entrained soil may be retained in downslope wetlands, thus reducing stream water and substrate quality.

### **3.1.13 Air Quality**

Akutan does not have an attainment area designation for National Ambient Air Quality Standard (NAAQS) pollutants. Air quality in Akutan and Akun is assumed to be good, although air quality monitoring for criteria pollutants has not been conducted in the area.

### **3.1.14 Noise**

The Akutan Airport is located on Akun Island approximately 7 miles from the community of Akutan. In addition to ~12 flights per week, maintenance of airport runway surfaces and vehicles are common and introduce anthropogenic (i.e., human caused) airborne noise. Additionally, the Surf Bay Inn and associated activities contribute to airborne noise from a generator and occasional truck and ATV traffic. Both facilities use diesel generators as primary sources of power.

Anthropogenic underwater noise in Surf Bay is likely from distant vessel traffic and occasional small skiffs that use the area. A few times a year a landing craft might arrive with larger items for the airport or other upland needs. Farther out in Akutan Bay and Akutan Harbor, underwater noise is primarily from commercial vessel traffic from a combination of tugboats, supply vessels and commercial fishing boats and occurs year around.

Underwater noise is also likely present in the area between Akutan and Akun from the helicopter. This noise can penetrate the underwater environment in the area under the aircraft and out to a narrow cone on each side of the aircraft.

Natural sources of airborne noise include wind, rain, birds, and terrestrial mammals such as cattle and foxes. Natural sources of underwater noise include waves, rain, and marine mammals.

### **3.1.15 Climate Change**

NOAA began publishing annual, peer-reviewed Ecosystem Assessment Reports (ESR) in 1999. These ESRs are developed individually for the Aleutian Islands, Gulf of Alaska, and Bering Sea and are intended to provide stronger links between Alaska ecosystem research and fishery management and spur new understanding of the connections

between ecosystem components by bringing together the results of diverse research efforts". The 2022 ESR for the Eastern Bering Sea (Siddon et al. 2022) state that in the Eastern Bering Sea, ocean observations show that the extended warm phase in the EBS, which started in approximately 2014, ended in 2022 (Figure 11). Measurements such as ocean temperatures and sea ice extent showed a relaxation to average conditions over the last year (since fall 2021). Several broad-scale climate indices that track trends across the North Pacific aligned, resulting in cooler conditions. A positive state of the North Pacific Index and Arctic Oscillation, as well as a continued La Niña, meant a return to more average sea surface temperature conditions for the EBS shelf. In fact, sea surface temperatures of the shelf were average to cool for most of the year. However, summer 2022 warming brought above-average temperatures over the shelf.

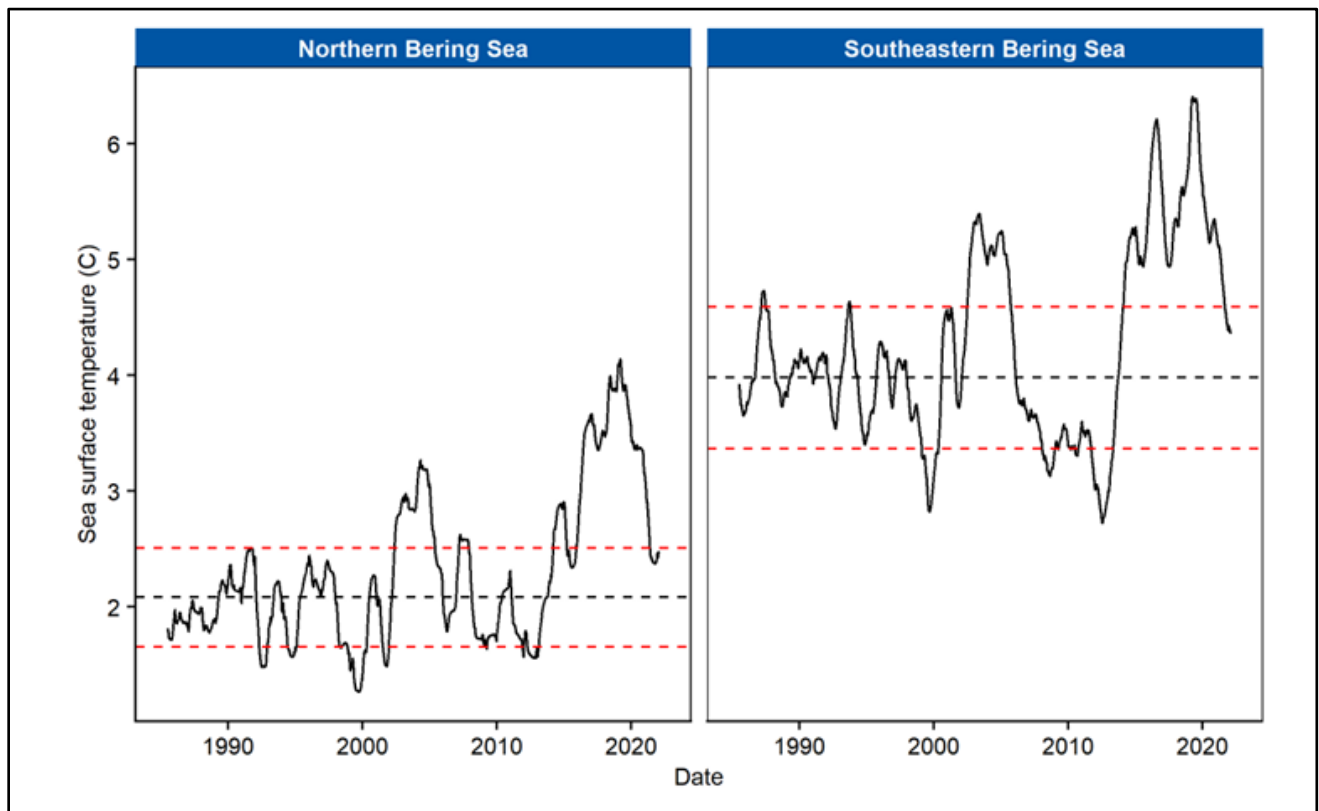


Figure 11. Time series trend of sea surface temperature for the Bering Sea

In the Eastern Aleutian Islands, sea surface temperatures during 2022 were not as high during winter as in the western and central Aleutians (Ortiz et al 2022). The marine heat wave periods were also of lower intensity and shorter, primarily restricted to summer. However, sea surface temperatures were the second highest (after 2014) since 1900 during the warm months, May – October (Figure 12).

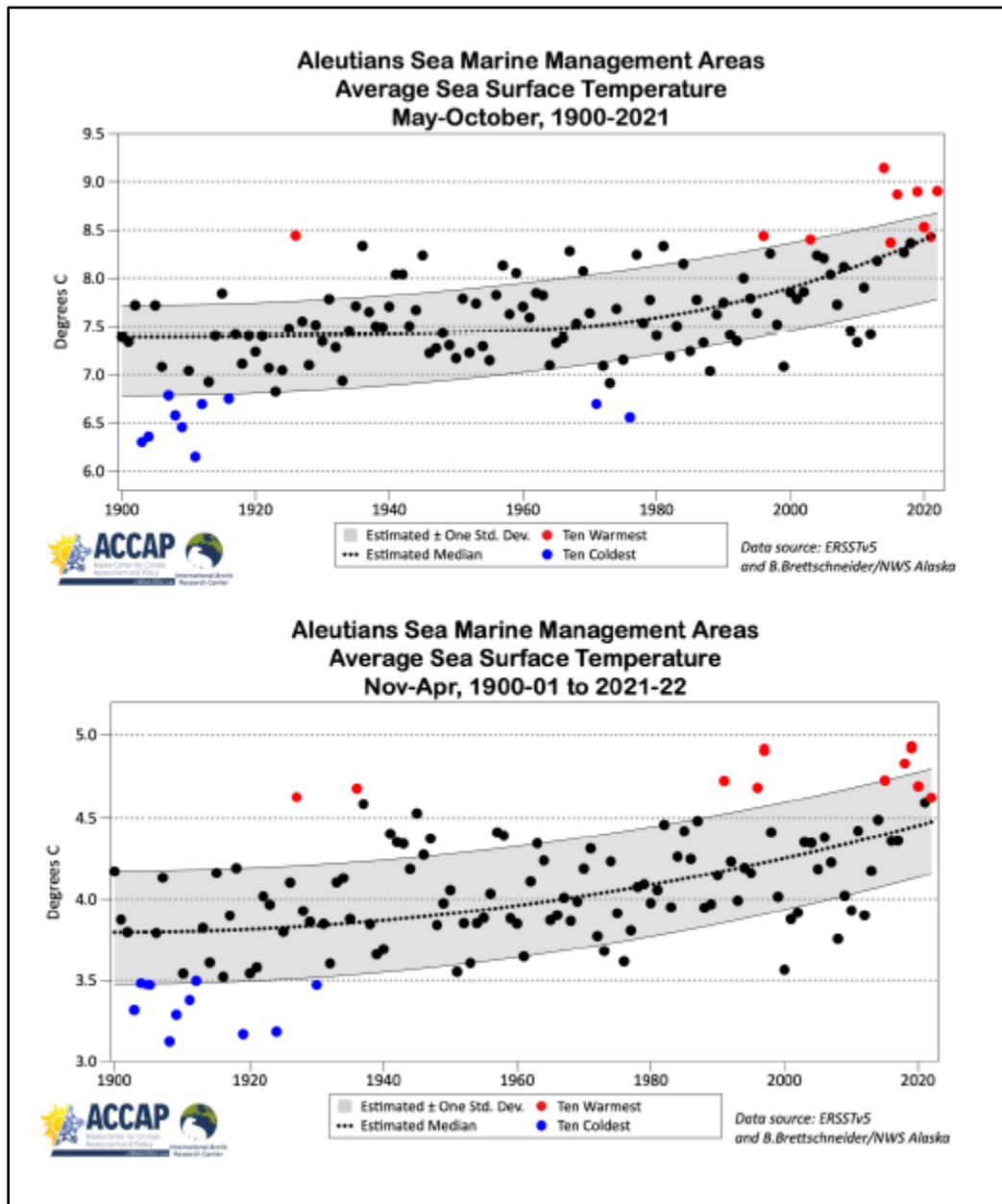
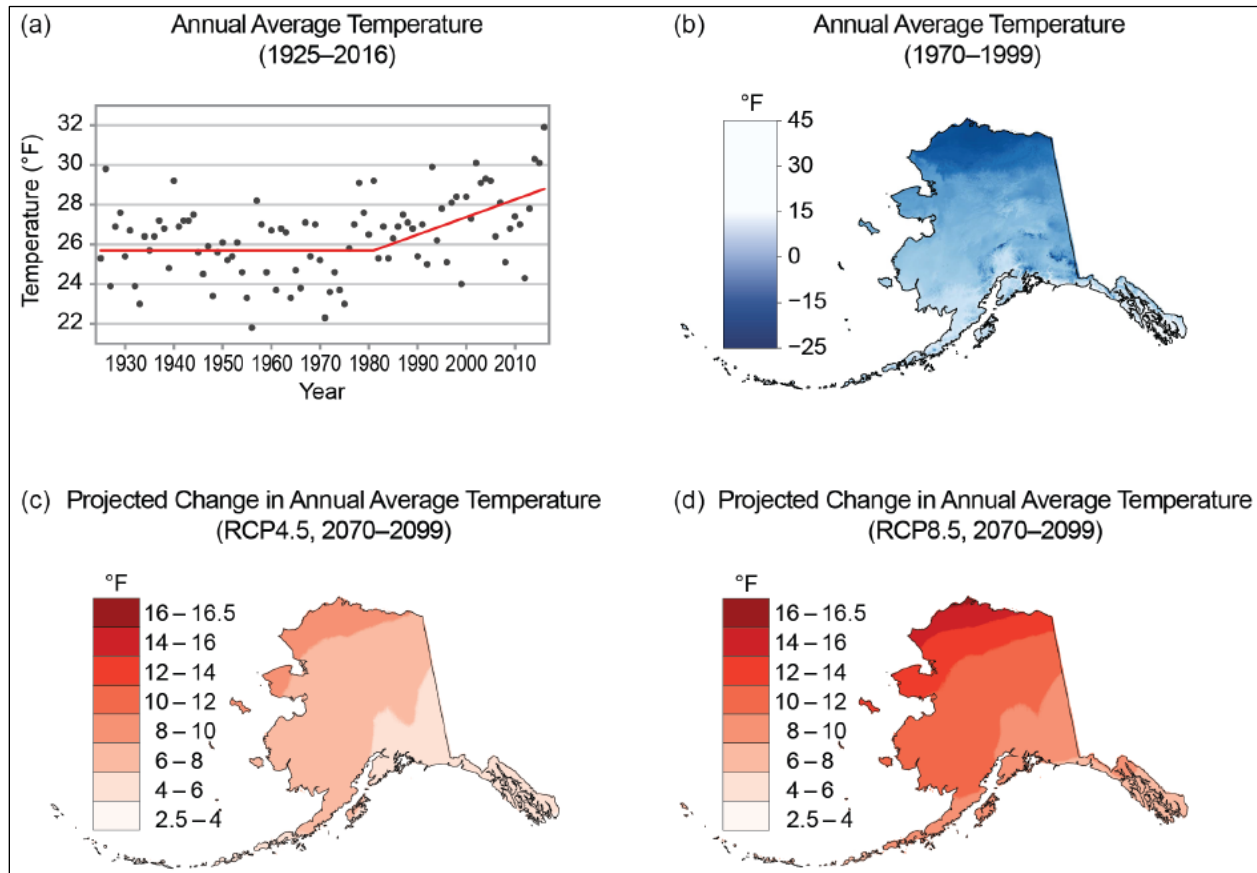


Figure 12. Seasonal sea surface temperatures for the Aleutian Islands from 1900–2022

According to the Fourth National Climate Assessment (Wuebbles, et al., 2019), a warming trend relative to average air temperatures has been recorded from 1925 through 1960. A trend of increasing temperatures starting in the 1970’s has been identified and is projected to continue throughout the state of Alaska. The largest temperature increases have been found in winter months with average minimum temperature increases of around 2° F statewide. Carbon emission models project variable increases in statewide temperatures across the state (Figure 13).



**Figure 13. Average Annual Air Temperature**

Note: Annotation truncated from report: (a) Alaska statewide annual temperatures for 1925-2016. The record shows high variability from 1925 to 1976, but from 1976-2016 a clear trend of +0.7°F per decade is evident. (b) 1970 –1999 annual average temperature. (c) Projected changes from climate models in annual average temperature for end of 21st century (compared to 1970 –1999 average) under a lower scenario. (d) The map is the same as (c) but for a higher scenario.

## 3.2 Natural Environment

### 3.2.1 Marine Environment

A few relatively distinct habitat types are present along the shorelines of Surf Bay, Akun Island. Along some areas, the habitat changes significantly between intertidal and subtidal zones. Intertidal habitats in Akutan Harbor were previously (Pentec 2006) categorized as: bedrock (sloping or horizontal), boulder/cobble, cobble/gravel, coarse sand/gravel, and mixed-fine (cobbles in and on a silty sand matrix). Of these, only bedrock/boulder and sand were present in Surf Bay.

Rocky habitats around Surf Beach on Akun Island support a biota that is generally similar to that reported by the limited number of other studies in the eastern Aleutians (e.g., Pentec 2004) at mid- and upper intertidal elevations. In general, species diversity of both fauna and flora was low and consisted of species with broad geographic

distributions and wide environmental tolerances. Species diversities were moderate on more exposed rocky substrata on the points separating the major drainages but lower on lower elevation rock that is adjacent to sand bottom areas where sand movement can intermittently bury or abrade attached biota. In contrast, diversity on the wave-exposed benches and boulders tended to be higher. Floating and submerged kelp beds were widespread in the area, and no eelgrass (*Zostera marina*) was observed. The sand beaches of Surf Bay represent a little studied habitat type in the Aleutian Islands that may have unrecognized ecological functions such as sand lance (*Ammodytes* spp.) spawning.

### 3.2.1.1 Marine Fish and Invertebrates

Surveys conducted by Alaska District biologists from 2021 - 2023 field seasons provided insight into the seasonal presence and relative abundance of nearshore marine biodiversity near the project area on Akun Island. This investigation incorporated contemporary molecular analysis using environmental DNA (eDNA) to thoroughly assess the biotic environment. The goal was to provide a baseline taxonomic assessment of the nearshore community that could be used to determine potential impacts from project alternatives.



Figure 14. eDNA sampling locations on Akun Island

Taxonomic assessment of the nearshore community at two sites (Figure 14) in the project area using eDNA detected a diverse range of fish species, and two non-target mammal species (Table 3). Site 1 was located near rocky intertidal habitat harbor near the hovercraft pad and exhibited a wider range of species present. The physical habitat features at Site 1 was similar to habitat observed at No-name Point and Rocky Outcrop, so this single sample site is representative of those rocky habitats. Site 2 sampled the sandy beach habitat of Surf Bay. Fewer species were identified at Site 2; however, Site 2 did contain species that were not present at Site 1.

Table 3. Results of 2022 eDNA sampling on Akun Island

FISHES			
Species	Scientific Name	SITE 1	SITE 2
Pacific sand lance	<i>Ammodytes personatus</i>	.	.
unidentified cockscomb	<i>Anoplarchus sp.</i>	.	.
Padded sculpin	<i>Artedius fenestralis</i>	.	.
Tubesnout	<i>Aulorhynchus flavidus</i>	.	.
Searcher	<i>Bathymaster signatus</i>	.	.
Sharpnose sculpin	<i>Clinocottus acuticeps</i>	.	.
unidentified sculpin	<i>Clinocottus sp.</i>	.	.
Pacific herring	<i>Clupea pallasii</i>	.	.
unidentified whitefish	<i>Coregonus sp.</i>	.	.
Walleye pollock	<i>Gadus chalcogrammus</i>	.	.
Pacific cod	<i>Gadus macrocephalus</i>	.	.
Three-spined stickleback	<i>Gasterosteus aculeatus</i>	.	.
Red Irish lord	<i>Hemilepidotus hemilepidotus</i>	.	.
unidentified Irish lord	<i>Hemilepidotus sp.</i>	.	.
Kelp greenling	<i>Hexagrammos decagrammus</i>	.	.
unidentified greenling	<i>Hexagrammos sp.</i>	.	.
Pacific halibut	<i>Hippoglossus stenolepis</i>	.	.
unidentified flatfish	<i>Kareius sp.</i>	.	.
unidentified snailfish	<i>Liparis sp.</i>	.	.
unidentified sculpin	<i>Myoxocephalus sp.</i>	.	.
unidentified sculpin	<i>Oligocottus sp.</i>	.	.
Pink salmon	<i>Oncorhynchus gorbuscha</i>	.	.
Chum salmon	<i>Oncorhynchus keta</i>	.	.
Coho salmon	<i>Oncorhynchus kisutch</i>	.	.
Chinook salmon	<i>Oncorhynchus tshawytscha</i>	.	.
unidentified flatfish	<i>Platichthys sp.</i>	.	.
Dolly Varden	<i>Salvelinus malma</i>	.	.
unidentified rockfish	<i>Sebastes sp.</i>	.	.
Pacific sandfish	<i>Trichodon trichodon</i>	.	.
		17-Jul-22	17-Jul-22
MAMMALS			
Species	Scientific Name	SITE 1	SITE 2
Sea otter	<i>Enhydra lutris</i>	.	.
Harbor seal	<i>Phoca vitulina</i>	.	.
		17-Jul-22	17-Jul-22

The investigation also included four seasonal marine sampling trips to determine the most appropriate in-water dredged material placement site should dredged materials



not be placed in the planned upland storage site for future use by others. The sample sites are shown in Figure 15.



Figure 15. Potential marine dredged material sampling sites

A summary of the catch from 4' x 4' baited crab pots at these locations, combined for all sampling trips, is presented in Table 4. Catch in all pots was low during all seasons and was dominated by snails and sea stars. The only crab caught were in one pot (Lost Harbor, Site E) on the November 2022 sampling trip.

Table 4. Summary of biological survey data

Sample site	Water Status	Catch Summary
A	404	giant wrymouth (1), Pacific cod (1)
B	404	hairy triton snail (5), pycnopodia (2)
C	404	Pacific cod (2), hairy triton snail (7)
D	404	hairy triton snail (8), pycnopodia (1)
E	404	tanner crab (10, juvenile males), hairy triton (12)
F	103	Brittle star (270)
G	103	hairy triton snail (4), Pacific cod (1)
H	103	pycnopodia (1)
I	103	no catch
J	103	not pot fished - sand waves observed on video

### 3.2.1.2 Marine Mammals

According to the NMFS Alaska Protected Resource Division ESA/MMPA Species Distribution Mapper (NMFS, accessed 2023), marine waters surrounding Akutan provide habitat for harbor seal (*Phoca vitulina*), killer whale (*Orcinus orca*), gray whale (*Eschrichtius robustus*), harbor porpoise (*Phocoena phocoena*); and, less frequently, northern fur seal (*Callorhinus ursinus*), Pacific white-sided dolphin (*Lagenorhynchus obliquidens*), Baird's beaked whale (*Berardius bairdii*), and Dall's porpoise (*Phocoenoides dalli*). These species, like all marine mammals, are protected under the Marine Mammals Protection Act (MMPA). Refer to Section 3.2.4 (Federal and State Threatened and Endangered Species) for information on ESA-listed species.

In January, February, and March of 2004; 92 harbor seals were observed during surveys in Akutan Harbor (HDR Alaska 2004b). Harbor seals were detected in the highest density near Race Rocks (~3.6 kilometers SW of the harbor site alternatives and outside the route between Akun and Akutan Harbor) where rocky outcroppings provide haul out sites. Winter 2006 surveys in Akutan Harbor, Akun Strait, and Surf Bay documented 18 sightings of harbor seals, mainly around Green Island (HDR 2006a, HDR 2006b). Additionally, killer whales and northern fur seals have been documented within Akutan Bay (Hoffman, personal observation). Killer whale pods were observed in Akutan Pass and Unalaska Bay in 2000 and 2001 (Schroeder 2000; Schroeder 2001). Harbor porpoises were observed in Akutan Bay during summer in 2022 (USACE, unpublished data, 2022). Marine mammal survey during June 2022 observed harbor porpoise, sea otter, harbor seal, and Stellar sea lion (Figure 16).



Figure 16. Surf Bay marine mammal survey 2022

### **3.2.1.3 Marine Birds**

There are many species of waterfowl present on Akun Island, such as dabbling ducks, diving ducks, and geese. Flocks of emperor goose (*Anser canagicus*) and harlequin duck (*Histrionicus histrionicus*) were observed near Surf Bay and in Akun Straits during winter surveys. Common merganser (*Mergus merganser*) and common goldeneye (*Bucephala clangula*) were documented in the nearshore areas of Surf Bay. Various gull species, specifically the glaucous-winged gull (*Larus glaucescens*), could be expected in the project area (Byrd 2005). A variety of waterfowl species have been observed at Surf Bay Lake and in other smaller lakes on Akun and Akutan Islands. These species include mallard (*Anas platyrhynchos*), green-winged teal (*Anas crecca*), common goldeneye (*Bucephala clangula*), bufflehead (*Bucephala albeola*), red-breasted merganser (*Mergus serrator*), common merganser (*Mergus merganser*), tundra swan (*Cygnus columbianus*), greater scaup (*Aythya marila*) and northern pintail (*Anas acuta*) (Byrd 2005). Ground bird nesting is likely limited on Akun Island due to disturbance by feral cattle and fox predation. There is a puffin (*Fratercula* spp.) colony on the cliffs on the south side of Lost Harbor about 6 kilometers north of the harbor alternatives.

Akun Island, including Green Island, contains several small seabird colonies. Double-crested cormorant (*Nannopterum auritum*), horned puffin (*Fratercula corniculata*), tufted puffin (*Fratercula cirrhata*), pelagic cormorant (*Urile pelagicus*), red-faced cormorant (*Urile urile*) and whiskered auklet (*Aethia pygmaea*) have been identified in the seabird colony at Akutan Point. According to USFWS, more than 50,000 tufted puffins are known to nest at Green Island near Surf Bay (USFWS 2007). While passing the north side of Green Island in June 2023, several hundred tufted puffins were observed in the shallow water adjacent to Green Island, but there were no nesting seabirds visible on the north side of the island (Hoffman, personal observation). It is likely that all or most of the nesting on Green Island occurs on the south side of the island where there is no line of sight to the project alternatives on Akun Island. According to the NOAA Fisheries, there are sea bird colonies located at Big Head and south of Green Bight (USACE 2004).

## **3.2.2 Terrestrial Environment**

### **3.2.2.1 Terrestrial Mammals**

Tundra vole (*Microtus oeconomus*), common shrew (*Sorex cinereus*) and red fox (*Vulpes vulpes*) are the only terrestrial mammals native to Akutan and Akun Island (Peterson, 1967). Other mammals occurring in the project area that are introduced include Arctic ground squirrel (*Urocitellus parryii*), northern collared lemming (*Dicrostonyx groenlandicus unalascensis*), Arctic fox (*Alopex lagopus*), and domestic rabbits (*Oryctolagus* spp.). Akun Island is home to approximately 1,200 feral cattle (*Bos taurus*) that range freely across the island. The cattle were introduced in 1965 and are currently owned by the Akutan Corporation (Reedy 2016). It is unknown whether rats, specifically the Norway rat (*Rattus norvegicus*), inhabit Akun Island.

### 3.2.2.2 *Terrestrial Birds*

Many resident and migratory North American avian species reside on the Aleutian Islands. Several Asian lineages of Holarctic avian species, such as the common teal (*Anas crecca crecca*) and Eurasian wigeon (*Mareca penelope*), are casual vagrants to the area (Murie, 1939). Songbird species, such as gray-crowned rosy-finch (*Leucosticte tephrocotis*), song sparrow (*Melospiza melodia*), Pacific wren (*Troglodytes pacificus*), common redpoll (*Acanthis flammea*), common raven (*Corvus corax*), and snow bunting (*Plectrophenax nivalis*), are common resident species observed on Akun Island. Other migratory songbird species present on Akun Island during the boreal summer include fox sparrow (*Passerella iliaca*), savannah sparrow (*Passerculus sandwichensis*), American pipit (*Anthus rubescens*), and Lapland longspur (*Calcarius lapponicus*). Game bird species on Akun Island are limited to the rock ptarmigan (*Lagopus muta*), a year-round resident found in uplands in the project area (Armstrong 1995). In Alaska, all birds except for state managed game bird species are protected under the Migratory Bird Treaty Act (MBTA).

The bald eagle (*Haliaeetus leucocephalus*) is a common resident species observed in the eastern Aleutian Islands. On Akutan and Akun Island, they are opportunistic foragers often scavenging fish carcasses. They often rest on the surrounding harbor infrastructure, such as crab pots and outbuildings. On Akun Island, one active bald eagle nest was observed near Daryl's Point (Figure 17). On 1 June 2023, there was an eagle sitting within the nest and was likely incubating due to the body position in the nest (Hoffman, personal observation). This nest is approximately 1,200 feet from the project the three project alternative sites.



Figure 17. Location of bald eagle nest observed on Akun Island.

### 3.2.2.3 Terrestrial Vegetation

Plant communities near Surf Bay (on Akun Island) can be categorized into the plant community types listed below:

- Shoreline Meadows
- Heath-grass-forb Meadows
- Graminoid-forb Meadows
- Ericaceous Dwarf Scrub
- Mesic Forb
- Mesic Graminoid
- Wet Graminoid

Previous wetlands determinations were conducted near the project area (Figure ). For more detailed information, please see the Akutan Airport Preliminary Jurisdictional Determination (HDR 2003b) and the Akun Island Alternative Preliminary Jurisdictional Determination (HDR 2005b).

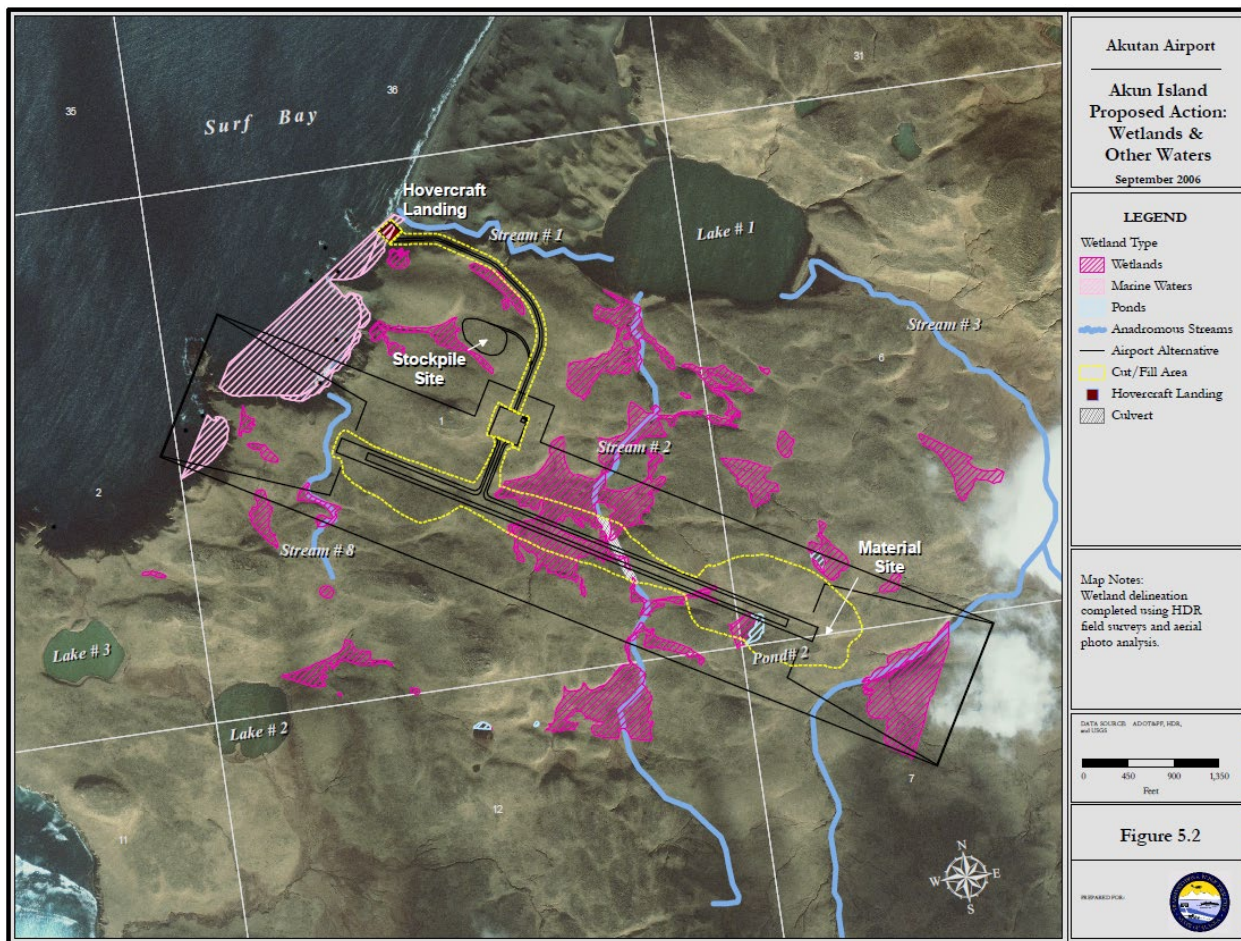


Figure 18. Wetlands in the Akun Island Project Area (HDR 2005b)

### 3.2.3 Essential Fish Habitat

The NOAA Fisheries identifies Akutan Harbor and Surf Bay as EFH for nine species of groundfish, three species of crab, and four Pacific salmon species as listed below:

- Pacific cod (*Gadus macrocephalus*)
- Walleye pollock (*Theragra calcogramma*)
- Atka mackerel (*Pleurogrammus monopterygius*)
- Yellowfin sole (*Pleuronectes asper*)
- Flathead sole (*Hippoglossoides elassodon*)
- Rock sole (*Lepidopsetta bilineata*)
- Alaska plaice (*Pleuronectes quadrituberculatus*)
- Sculpins (*Cottidae* spp.)
- Skates (*Raja* spp.)
- Red king crab (*Paralithodes camtschaticus*)
- Golden king crab (*Lithodes aequispinus*)
- Tanner crab (*Chionoecetes bairdi*)
- Coho salmon (*Onchorynchus kisutch*)
- Chum salmon (*Onchorynchus keta*)
- Pink salmon (*Onchorynchus gorbuscha*)
- Sockeye salmon (*Onchorynchus nerka*)

There are nine streams, three lakes, and two stream-connected ponds that have been identified on Akun Island. No known anadromous fish studies had previously been conducted on Akun Island. Notwithstanding this fact, NOAA Fisheries has been consulted regarding the effects of the proposed action on these streams, and their conservation recommendations have been incorporated into the preferred alternative. Three streams and one lake were found to support anadromous fish populations in the Akun Island project area during field surveys conducted for this project (Figure 2.1). These were Stream #1 (Lower Surf Creek), Stream #2 (and associated tributaries and ponds), Stream #3 (Upper Surf Bay Creek), and Lake #1 (Surf Bay Lake – Salmon Stream). Anadromous fish in these areas include sockeye, pink, and coho salmon (HDR 2005a).

During the course of USACE's environmental studies on Akun Island, eDNA samples were taken from the Surf Bay area (Section 3.2.1.1). It should be noted that several of these species are present in the list above, while others are absent. This result is likely due to seasonal or sampling availability and should be regarded as representative of those species present at the time of sampling.

### 3.2.4 Federal and State Threatened and Endangered Species

Species listed under the Endangered Species Act and designated Critical Habitat are presented in Table 5. Common species are discussed further in subsequent sections.



Table 5. Listed species and designated critical habitat in the project area

<b>ESA Species</b>	<b>Listing Status</b>	<b>Managing Agency</b>
Steller sea lion - Western DPS	Endangered	NMFS
Fin whale	Endangered	NMFS
Humpback whale	Endangered	NMFS
North Pacific right whale	Endangered	NMFS
Sperm whale	Endangered	NMFS
Western N Pacific Gray whale	Endangered	NMFS
Sunflower Sea Star	Proposed	NMFS
Steller's eider	Threatened	USFWS
Short-tailed albatross	Endangered	USFWS
Northern sea otter - SW Alaska DPS	Threatened	USFWS
<b>Critical Habitat in project area</b>		
Steller sea lion - Western DPS		NMFS
Humpback whale Western N Pacific DPS		NMFS
Northern sea otter - SW Alaska DPS		USFWS

#### **3.2.4.1 Steller's Eider**

The Alaska breeding population of Steller's eider (*Polysticta stelleri*) was listed as a threatened species under the ESA in 1997. Steller's eider are also listed as a SSC by the ADF&G and protected by the MBTA. Steller's eiders are known to occur in Akutan Harbor during the winter months. No critical habitat is present in the project area. Surveys were conducted by HDR Alaska, Inc. in January, February, and March 2006 to determine the distribution and abundance of Steller's eider in Akutan Harbor, Akun Strait, and Surf Bay along the proposed hovercraft routes. Numbers were highest in January (136), with declines in February (88) and by March only 13 Steller's eider were observed. Preferred habitat appeared to include protected areas within 165 ft to 330 ft of the shoreline. The location of Steller's eider flocks appeared to change frequently to maximize protection from the wind. Steller's eider were most abundant immediately off the community of Akutan and on the southeast end of Surf Bay.

A boat-based waterfowl survey for Steller's eider was completed in February 2023. Marine nearshore habitat was surveyed at 4 knots along the route shown in Figure 19. February 2023 Steller's eider survey route starting in Lost Harbor on Akun Island, transiting Akutan Bay, and ending near the old whaling station in Akutan Harbor on Akutan Island.



Figure 19. February 2023 Steller's eider survey route

During this survey, the only Steller's eiders observed were at the head of Akutan Harbor and inside the small boat harbor. There were 8 Steller's eiders inside the boat harbor and 24 along the southwest side of Akutan Harbor. Figure 20 shows the areas where these eiders were encountered in yellow polygons.



Figure 20. Steller's eider locations in yellow polygons

#### **3.2.4.2 Northern Sea Otter**

Along with being listed as threatened under the ESA and as a Species of Special Concern by the ADF&G, sea otters (*Enhydra lutris*) in the United States are also protected from hunting and harassment by the Marine Mammal Protection Act of 1972 (MMPA). There is critical habitat for northern sea otter (*Enhydra lutris kenyoni*) in the waters of Surf Bay, Akutan Bay, and Akutan Harbor. Work is currently underway to characterize important breeding and feeding habitat for northern sea otters in Alaska. Groups of up to 20 otters were observed on several occasions in nearshore areas near the Whaling Station and crab pot storage area in Akutan Harbor during surveys conducted in 2004 (HDR 2004b). During surveys conducted in winter 2006, the number of otters observed was highest in January (22 otters), with declines in February (17 otters), and by March only 7 otters were observed (HDR 2006a). Preferred habitat appears to include protected areas in Akutan Harbor near the village of Akutan and along nearshore habitats at Akun and Green Island. Sea otters were commonly observed in small groups of 1 to 3 otters near all the harbor site alternatives during summer 2022 USACE observations. As all three alternatives are close together, otter numbers were similar at each site as they tended to move around through the general area.

#### **3.2.4.3 Steller Sea Lion**

Steller sea lion (*Eumetopias jubatus*) are listed as endangered under the ESA, and are a SSC by the ADF&G. This species is also protected under the MMPA. According to NOAA Fisheries, there are no haul-outs or rookeries for Steller sea lion in Akutan Harbor. The nearest major rookery to the project area is at Cape Morgan, and the nearest haul-out site is at Lava Reef. Critical habitat for Steller sea lion has been identified at Billings Head on Akun Island and Cape Morgan on Akutan Island. These locations are at least 10 miles from the closest project component (Eagleton 2007), but the project area still falls within designated critical habitat. Steller sea lion frequent the nearshore areas of Akutan Harbor and have been observed in association with the Trident Seafoods facility wastewater outfall. Steller sea lion have been observed along the northern nearshore areas of Akutan Harbor and near Akutan Point during winter surveys (HDR 2004b, HDR 2006a). Sea lions were uncommon near all the harbor site alternatives during summer 2022 USACE observations. During five days of surveys in June 2022 only one Steller sea lion was observed approximately 1,500 meters away from the nearest harbor site alternative.

#### **3.2.4.4 Humpback Whale**

Humpback whale (*Megaptera novaeangliae*), listed as endangered under the ESA and by ADF&G and protected by the MMPA, occur infrequently inside Akutan Harbor. There is designated critical habitat in the project area for the Western North Pacific DPS of humpback whales. Humpback whale occurrence is associated with large schools of herring (*Clupea* spp.), which are present in Akutan Harbor during the summer when they are preying on sand lance (*Ammodytes* spp.) (Byrd 2001). According to NOAA

Fisheries, humpback whales may inhabit the waters around Akutan Harbor (Smith 2004b). Residents have reported that humpback whales have entered Akutan Harbor, presumably to forage on large schools of fish (USFWS 2002c). Humpback whales in the project area are composed of the endangered Western North Pacific Stock (~2%), the threatened Mexico DPS (~7%) and the remaining ~91% are from the Hawaii DPS which is not ESA-listed.

Humpback whales were not observed during any field efforts conducted for this project.

#### **3.2.4.5 Short-tailed Albatross**

The short-tailed albatross (*Phoebastria albatrus*) is listed as an endangered species under the ESA and is protected under the MBTA. The bird is also listed as endangered by the ADF&G. This species is widely distributed across the temperate and sub-temperate North Pacific, and can be seen in the Gulf of Alaska, along the Aleutian Islands, and in the Bering Sea. Short-tailed albatross are not associated with harbor or protected near shore marine waters, and no critical habitat has been designated for this species. Short-tailed albatross were not observed in the project area during field surveys conducted in 2004 or 2006 (HDR 2004b, HDR 2006a) nor USACE field work in 2022–2023.

#### **3.2.4.6 Other Listed ESA Species**

Other ESA listed marine mammals in the project area include fin whale (*Balaenoptera physalus*), North Pacific right whale (*Eubalaena japonica*), sperm whale (*Physeter macrocephalus*), and Western North Pacific gray whale (*Eschrichtius robustus*). While these species are likely less common in the area, there is a chance they could occur infrequently in small numbers. None of these species were observed on project related surveys.

### **3.2.5 Special Aquatic Sites**

“Special aquatic sites” means wetlands, mudflats, vegetated shallows, coral reefs, riffle and pool complexes, sanctuaries, and refuges as defined at 40 CFR 230.40 through 230.45.

Intertidal waters form narrow bands below high tide line along Akutan Harbor. Most of the intertidal waters in the Akutan Island project area are rocky and support mussels, barnacles, and rockweed. The intertidal waters of Surf Bay on Akun Island are generally sandy and devoid of animal or algal growth. In comparison, intertidal areas south of the proposed harbor site are rocky and support mussels, barnacles, and rockweed. The single wetland in the Akun Island project area is a depression near the proposed dredged material storage site. This wetland is largely formed by groundwater discharge and water from some small, incised channels. The ground water discharge that forms the wetland helps maintain small base stream flows. As this wetland is perched on high

ground and the outlet flows down the steep cliff towards the harbor site the gradient is too steep, and the water is too shallow and intermittent to support any fish (resident or anadromous). Plants growing in the wetlands provide food for the cattle and small herbivores, and invertebrates supported by the plants provide food for birds. The cattle cycle nutrients back to the wetlands and promote plant growth. Organic material from the wetlands' sedges and mosses and from the organisms that consume those plants is likely washed downstream where it supports stream and marine food webs.

Akutan and Akun Islands fall within the overarching boundary of the Alaska Maritime National Wildlife Refuge (AMNWR). Portions of its surface landmass are owned and managed by the U.S. Fish and Wildlife Service (USFWS) for conservation, protection, and the overall enhancement of fish, wildlife, plants, and their habitats for the continuing benefit of the American people. Landmasses that are part of any of the three action alternatives considered in the document are not part of the AMNWR.

An anadromous stream (AWC 302-16-10100) is located near the old hovercraft pad and leads drains a small lake located about 700 meters upstream (called Salmon Stream). This stream is listed for the presence of pink salmon and for having rearing Coho salmon. This stream and lake are nearby but are not in the project footprint. Intertidal waters form narrow bands below high tide line along Akutan Harbor. Most of the intertidal waters in the Akutan Island project area are rocky and support mussels, barnacles, and rockweed. The intertidal waters of Surf Bay on Akun Island are generally sandy and devoid of animal or algal growth (Figure 21). In comparison, intertidal areas south of the proposed harbor site are rocky and support mussels, barnacles, and rockweed.

The single wetland in the project area on Akun Island is a depression near the proposed dredged material storage site. This wetland is largely formed by groundwater discharge and water from some small, incised channels. The ground water discharge that forms the wetland helps maintain small base stream flows. As this wetland is perched on high ground and the outlet flows down the steep cliff towards the harbor site the gradient is too steep, and the water is too shallow and intermittent to support any fish (resident or anadromous). Plants growing in the wetlands provide food for the cattle and small herbivores, and invertebrates supported by the plants provide food for birds. The cattle cycle nutrients back to the wetlands and promote plant growth. Organic material from the wetlands' sedges and mosses and from the organisms that consume those plants is likely washed downstream where it supports stream and marine food webs.



Figure 21. Intertidal habitat of Surf Bay on Akun Island (top), underwater footage of Surf Bay (bottom).

### 3.3 Built Environment

Previous to the construction of the Akutan Harbor in 2012, there were two primary marine facilities in the Akutan city area, the City Dock and the Trident Seafoods' dock (Figure 22). However, these docks are working docks and not long-term moorage facilities, and do not provide protection from storm waves entering from Akutan Bay. A smaller site referred to as Skiff Harbor is located behind the City Dock.



Figure 22. Akutan Harbor Built Environment

### 3.3.1 Akutan Harbor and Road

The small boat harbor at the head of Akutan Harbor is referred to as the “Akutan Harbor” and was constructed by USACE in 2012 (Figure 23). The harbor has a basin area of approximately 12 acres and currently has a single 560-foot by 16-foot float that can accommodate up to 10–12 vessels up to 165 feet in length. Electricity is available on the float, and harbormaster facilities are on site. Ownership of Akutan Harbor was transferred to AEB in 2013 and it is currently operated by the City of Akutan.



Figure 23. Akutan Harbor (small boat harbor)

A road from the community of Akutan to the Akutan Harbor was funded by the Denali Commission and the City of Akutan in 2022. Road design has been completed and the project is currently being permitted (Figure 22). Materials will be stockpiled at the site and stored in 2023, with construction to be completed in 2024. The road begins on the beach west of Trident Seafood Plant and maintains a low elevation along the coastline and then crosses the wetlands and Whalebone Creek at the head of the Akutan Harbor body of water. The road is approximately 1.25-miles long with a 12-foot-wide drivable surface. The road will accommodate two-way traffic for ATV's but will be limited to one way traffic for larger vehicles.

### 3.3.2 City Dock

The City Dock (also referred to as the Ferry Dock) is a platform dock that was built in 1982 for the M/V *Tustumena*, a 296-foot ferry operated by the Alaska Marine Highway System (Figure 24). It is owned by AEB. The 300-foot dock is constructed of concrete panels, steel pile caps and steel support piling. Abutting the back of the dock is an earth filled sheet pile bulkhead for the full length of the dock. There are two mooring dolphins with fender units on each side of the dock. In line with the western dolphins is a sheet pile wall that acts as a wave barrier for a small boat harbor, with a 50-foot extension installed in 2005. The existing fender system was raised, and new mooring dolphins were installed in 2015. A portion of this dock also serves as the breakwater protecting the existing skiff harbor at Akutan.



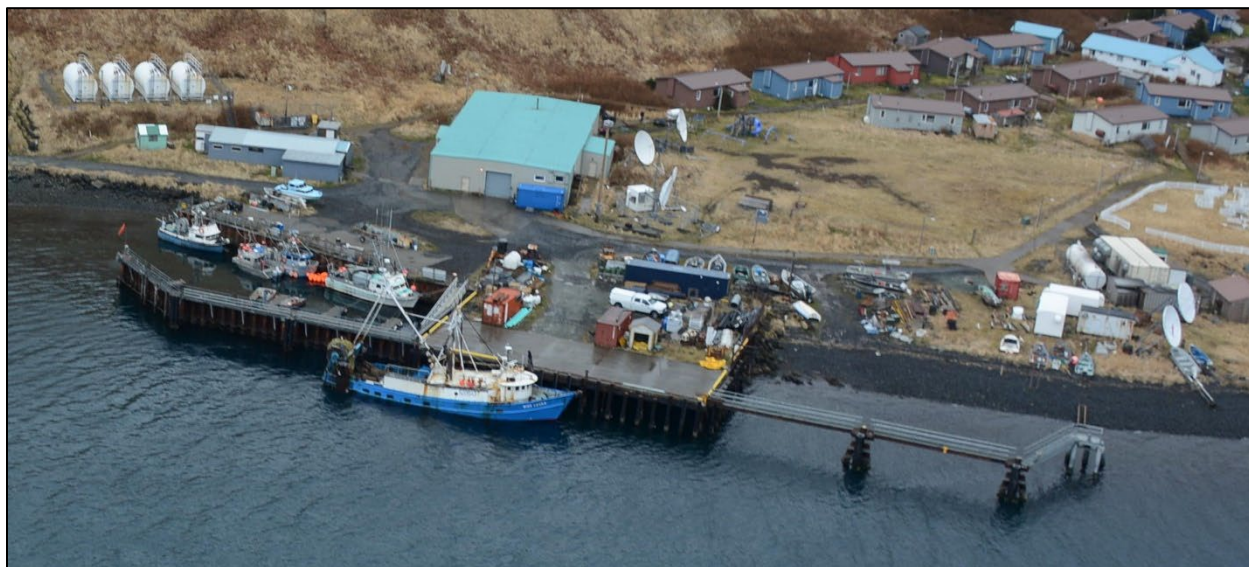


Figure 24. City Dock (with Skiff Harbor behind the dock face to the left)

### 3.3.3 Skiff Harbor

The Aleutians East Borough built a fair-weather skiff and small boat mooring facility adjacent to the City Dock in 2001 (Figure 25). The skiff harbor is partially protected by the shoreward extension of the City Dock. This facility provides moorage for a limited number of small vessels, with sheet pile walls on three sides, a wood platform dock with berthing, and an opening to the northwest. Larger vessels utilize sheet pile walls for berthing.



Figure 25. Skiff Harbor

### 3.3.4 Trident Dock

The Trident Seafoods Akutan plant is located about 1/4 of a mile west of the village and has over 2,300 feet of berthing area for staging, loading, and unloading vessels (Figure 26). This facility is one of the largest fish processing plants in the United States.



Figure 26. Trident Dock

### **3.3.5 Akutan Airport**

Prior to 2012, Akutan has only been accessible by boat and amphibious aircraft. The steep terrain on volcanic Akutan Island presented engineering obstacles for a land-based airport, so several locations on Akun Island were investigated as alternative sites. After almost ten years of investigation, studies, assessments, and meetings, the Akutan Airport Construction Project began on Akun Island in March of 2010. The facility includes a 4,500-foot paved runway, a taxiway, an apron, a sand storage building, a snow removal equipment building, a maintenance and storage facility, a hovercraft landing pad, an access pad, and surrounding access roads. The Surf Bay Inn on Akun Island, operated by the City of Akutan, is available to provide for stranded passengers. The Akutan Airport on Akun Island was opened in September 2012 (Figure 27).



Figure 27. Akutan Airport on Akun Island

### 3.4 Socio-Economic Resources

The written history of the Akutan region can be traced to the middle of the 18th century and extended in time to remote prehistory based on oral history and archeological data.

The community of Akutan began in 1878 as a fur storage and trading port for the Western Fur & Trading Company. The company's agent established a commercial cod fishing and processing business that quickly attracted nearby Unangan to the community. A Russian Orthodox church and a school were built in 1878 and the St. Alexander Nevsky Chapel was built in 1918 to replace the original structure. The Pacific Whaling Company built a whale processing station across the bay from Akutan in 1912. It was the only whaling station in the Aleutians and operated until 1939. After the Japanese attacked Unalaska in June 1942, the U.S. government forcibly evacuated Akutan residents to the Ketchikan area. The village was re-established in 1944, although many villagers chose not to return. This exposure to the outside world brought many changes to the traditional lifestyle and attitudes of the community. The City was incorporated in 1979.

Presently, boardwalks connect the homes and facilities for foot and ATV traffic. Except for a 1-mile-long road that leads from the village to Trident, there are no roads in Akutan. Akutan village has a limited number of community facilities and organizations including the City, Tribal, and Village Corporation offices, the historic St. Alexander Nevsky Russian Orthodox Church, a K-12 state school, the Anesia Kudrin Memorial Tribal Health Care Clinic, a jail, and a locally owned bar (Akutan Roadhouse Bar).

### 3.4.1 Population and Demographics

In 1880, the U.S. Census reported a human population of 65 at Akutan. The population increased to 169 in 1980, after which Trident Seafoods constructed a seafood processing plant in Akutan. Since then, the population has increased to 1,589 individuals in 2020, with the population divided between year-round residents (113) and transient fish processing workers (1,476) who live in bunkhouses on the Trident Seafoods campus (Table 4). Those residing in the village of Akutan totaled less than 8 percent of the overall inhabitants of the island in the year 2020.

Table 6. Akutan Population by Residence Type, Census Years 1990 through 2020

Census Year	Group Quarters* Population	Akutan Population	Total Population
1990	501	88	589
2000	638	75	713
2010	937	90	1,027
2020	1,476	113	1,589

Source: State of Alaska, Division of Community and Regional Affairs and Department of Labor and Workforce Research and Analysis Section, in addition to Fall et al 2012.

According to Alaska Department of Fish and Game subsistence household surveys for 2009, an estimated 88.9 percent of the 40 households of the community of Akutan had an Alaska Native as head of household, with the total estimated population of Alaska Natives being 81.1 percent (Fall et al 2012). Census records reflect a smaller distribution of Alaska Native in the overall population (12.15%) due to the migratory workers of Trident Seafoods being included within the estimates. While many population statistics encompass both populations, there is little interaction between the two populations on the island.

The large numbers of individuals living in group quarters in Akutan, and the Aleutian Islands in general, make populations very difficult to forecast. Business decisions by Trident Seafoods and shifts in seafood harvesting could greatly impact long-term population in Akutan, decreasing the accuracy of any attempt to forecast the population at the Akutan Island level. The population projection for the Aleutians East Borough from 2025 through 2050 shows a slight decline (0.1%), primarily due to forecasted birth and death rates, rather than migration. However, historical populations of Akutan have shown population increases, largely due to the processing workers. Given the uncertainty inherent in any population projection for Akutan, for purposes of this analysis the population is held static from 2021 levels and does not include Trident Seafoods workers (as the study is formulated to meet the needs of the community of Akutan).

The Akutan School operates as part of Aleutians East Borough Schools and serves grades pre-kindergarten through 12. Total enrollment from 2001 through 2022 ranged

from 7 to 20 students (Figure 28), with an overall increasing trend during this period (Department of Education and Early Childhood Development).

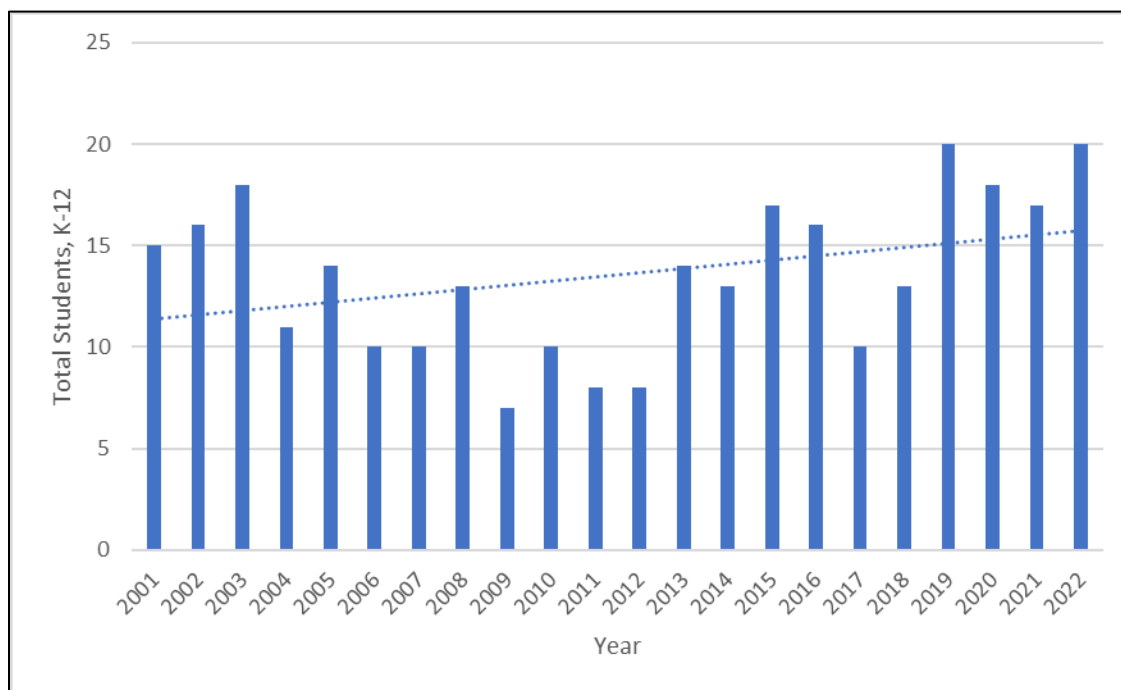


Figure 28. Akutan School Enrollment, 2001-2022

Schools in Alaska are required to have a minimum of 10 students to receive state funding. The stable enrollment shown in Figure 23 points to a positive sign that the school at present does not face an immediate threat of closing. However, school enrollment does not necessarily fulfill all K-12 education requirements. For Alaska Natives, one’s education extends to learning from community members and elders. This learning is often knowledge shared by participating together in subsistence activities connected to specific places. More detailed population information is contained in Appendix C: Economics.

### 3.4.2 Employment and Income

As with many statistics for the village of Akutan, employment and income data for the permanent residents specifically (rather than as a combined total with the transient processing workers) is largely unavailable. Data that is available combines both the resident and non-resident populations and is highly variable depending upon the season.

According to the 2021 U.S. Census American Community Survey, the median household income in Akutan is \$32,750, with 22.4 percent of people living below the federal poverty line. This compares to the state of Alaska with \$77,845 and 10.5 percent of people, respectively (U.S. Census 2021)

Per capita income in Akutan is \$34,515, compared to the US at \$38,332. However, when you look at just the American Indian and Alaska Native segment of the population (which is the best available proxy for eliminating the transient workers from the dataset), the per capita income for Akutan drops to \$15,316. This low per-capita income becomes even more of a hindrance when the high cost of living that is associated with remote Alaska is considered.

As a result of the Trident processing plant, a key industry in Akutan is commercial fishing and many of those employed are transient workers housed in a group setting on the Trident Seafoods campus. The American Community Survey (2021) reports employment by industry for Akutan, which highlights the impact of manufacturing (seafood processing) in the community at 76.1 percent of employment. Public Administration is the second largest employer at 17.1 percent of the total. It is worth noting that these statistics include both the resident and transient populations, and data for the resident population alone is unavailable.

The Akutan Corporation rents apartments to visitors in the Bayview Plaza Hotel and the Salmonberry House. Business licenses for the community on Akutan consist of the Akutan Corporation, the Bayview Plaza Hotel, the McGlashan Store, the Salmonberry Inn, and the A.C. Apartments (State of Alaska DCRA Information Portal for Akutan). The Surf Bay Inn is the sole business license on Akun Island.

Commercial fishing has historically played an important role in the local economy of Akutan, although participation and income derived from fishing has been decreasing. Commercial fishing jobs (this does not include processing jobs) represented 19% of all jobs held by Akutan residents in 2008, compared to 37% of all jobs in 1990. Of all Akutan households, 33% in 2008 had at least 1 member employed in commercial fishing, compared to 73% of households in 1990. For Akutan households with any cash employment, 35% in 2008 and 75% in 1990 had members involved in commercial fishing. Of all Akutan adults who had employment in 2008, 30% worked in commercial fishing jobs (about 18 individuals), compared to 44% (44 individuals) in 1990. Commercial fishing jobs produced 26% of the earned income and 22% of all income in Akutan in 2008; in 1990, 35% of earned income and 29% of all income derived from commercial fishing (Fall et al 2012). Commercial fishing vessels homeported in Akutan range in size from 16 to 42 feet in length, with the most common length being 18 feet, for the years 2000-2023. There was a minimum of 1 vessel, and a maximum of 7 vessels, permitted per year during that period.

Akutan participates in the Community Development Quota (CDQ) Program. The program was established with four goals: "(i) to provide eligible western Alaska villages with the opportunity to participate and invest in fisheries in the Bering Sea and Aleutian Islands Management Area; (ii) to support economic development in western Alaska; (iii) to alleviate poverty and provide economic and social benefits for residents of western Alaska; and (iv) to achieve sustainable and diversified local economies in western

Alaska.” (NOAA). More detailed employment and income information is contained in Appendix C: Economics.

### **3.4.3 Existing Infrastructure and Facilities**

The crab and fish processing industry developed in Akutan in the late 1940s with the use of numerous floating processors operating in Akutan Harbor. By the 1980s, Trident constructed a shore-based processing plant which largely replaced the floating seafood processors. At the time of writing, it was the largest seafood processing facility as well as one of North America’s busiest fishing and shipping ports. This facility processes Bering Sea-caught seafood products year-round and during peak periods employs and houses more than 1,400 people, with imported labor from around the world.

The Trident Akutan plant sustains a year-round, multi-species frozen seafood operation capable of processing more than 3 million pounds of raw fish per day. The Trident Seafood plant in Akutan primarily processes walleye pollock and large volumes of Pacific cod, king and snow crab, halibut and sablefish.

In addition to traditional boxed and frozen seafood items, the plant is also capable of producing surimi and can recover large volumes of secondary products including pollock roe, fishmeal, and fish oil.

More information on existing infrastructure and facilities can be found in Section 3.3, Built Environment.

### **3.4.4 Freight & Fuel Delivery**

#### **3.4.4.1 Freight Operations**

Mail and light freight are delivered by the fixed-wing aircraft between Dutch Harbor and Akun, and then carried on the helicopter between Akun and Akutan. Two methods are used for helicopter freight. The first involves transport of cargo by placing it inside the helicopter (either in the passenger cabin or in the luggage compartment). While passengers are prioritized above mail/freight movements, when less than a full load of passengers is on board, the flight can accommodate a mix of both. The second freight method involves the transport of cargo outside the aircraft, suspended on a special hook or other type of attachment – often referred to as “sling loading.” More information on freight and mail operations can be found in Economics: Appendix C.

Frozen foods, bulk freight, lumber, and other building supplies and larger items are transported directly to Akutan (bypassing Akun) via large tramp freighters or tug-and-barge operations. These trips can occur every two weeks. These heavy freight operations are unlikely to be expanded to incorporate regular deliveries of mail and light freight, or passenger transportation.



### **3.4.4.2 Fuel Operations**

Fuel is transported to Akutan via Delta Western barges from Dutch Harbor. According to the Mayor of Akutan, the city has a 30,000-gallon fuel capacity and DOT has 8,000-gallon capacity.

There are no aircraft fueling facilities on Akun Island. The fixed-wing aircraft refuels at the Unalaska Airport, while the helicopter obtains fuel from the hangar facility near the Akutan Harbor. Fuel transported from Akutan to Akun supports airport operations including the generator and maintenance equipment. Small amounts of fuel are transported from Akutan to Akun by the helicopter (sling loads) or by skiff in drums, and are transferred twice per year (spring and fall) to provide for airport operations.

### **3.4.1 Transportation**

The maritime climate in the Aleutians influences all aspects of life. The weather is known to be harsh, and in combination with the remoteness of the region, getting to and from Akutan can be difficult. Akutan's location in the Aleutian Island archipelago limits transportation to air and maritime travel.

#### **3.4.1.0 Alaska Marine Highway System**

The Alaska Marine Highway System (AMHS) is a ferry service operated by the State of Alaska which provides transportation to coastal communities, particularly those not on the road system. The ferries of the Alaska Marine Highway cover 3,500 miles of coastline and provide service to over 30 communities and is an integral part of Alaska's highway system, reaching many communities that would otherwise be cut off from the rest of the state and nation. The AMHS is designed to provide basic transportation services to those remote communities, and vessels are designed to carry both passengers and limited vehicles.

Akutan is serviced by the AMHS Southwest Alaska route, which serves Prince William Sound, the Kenai Peninsula, Kodiak Island, and the Aleutian Islands with the M/V *Tustumena* (Figure 29), a 296 foot ferry capable of carrying 160 passengers and 34 vehicles. The Aleutian chain, including Akutan, does not have scheduled service in the winter due in part to adverse weather conditions. Beginning in 2022, the M/V *Tustumena* makes only three stops in Akutan per year; once in July, August, and September.



Figure 29. Alaska Marine Highway System, Southwest Route

### 3.4.1.1 Air Transportation

The existing transportation system in Akutan consists of both a helicopter and a fixed-wing aircraft. The helicopter is housed at Akutan Harbor and makes trips back and forth between the community of Akutan and their airport on the island of Akun. The fixed-wing is housed in Unalaska-Dutch Harbor and makes trips back and forth between Unalaska and the airport on Akun (Figure 30).

When a fixed-wing flight is in-bound to Akutan Airport, the helicopter crew currently take a skiff from the community of Akutan to the hangar where the helicopter is based, near the small boat Akutan Harbor. The crew flies the helicopter back to the community of Akutan to pick up passengers. After coordinating with the fixed-wing aircraft, the helicopter flies to the airport on Akun Island to drop off outgoing passengers and pick up incoming passengers and/or freight. The helicopter then flies back to the community of Akutan before returning the helicopter to the hangar at the small boat Akutan Harbor. The helicopter crew are transported back to the community of Akutan via skiff. Two round trips per day are scheduled, but more or less trips may be necessary.

Tickets are purchased for each leg of the flight in and out of Akutan; on the fixed-wing from Akun to Dutch Harbor to Akun, and on the helicopter from Akun to Akutan back to Akun.



Figure 30. Akutan Transportation System

### 3.4.1.2 Essential Air Service

The Department of Transportation states that “the Airline Deregulation Act (ADA), passed in 1978, gave air carriers almost total freedom to determine which markets to serve domestically and what fares to charge for that service. The Essential Air Service (EAS) program was put into place to guarantee that small communities that were served by certified air carriers before airline deregulation maintained a minimal level of scheduled air service. The United States Department of Transportation is mandated to provide eligible EAS communities with access to the National Air Transportation System.”

Under the EAS program, the US Department of Transportation determines the “minimum level of service required at each eligible community by specifying a hub through which the community is linked to the national network, a minimum number of round trips and available seats that must be provided to that hub, certain characteristics of the aircraft to be used, and the maximum permissible number of intermediate stops to the hub. Where necessary, the Department pays a subsidy to a carrier to ensure that the specified level of service is provided. Most eligible points do not require subsidized service but as of April 1, 2009, the Department was subsidizing service at 108 communities in the contiguous 48 states, Hawaii, and Puerto Rico, and 45 in Alaska.” Both the fixed-wing service between Unalaska and Akutan, and the helicopter service between Akutan and Unalaska are subsidized through this program (Table 7). Please note that this table does not include the annual subsidy provided by the Aleutians East Borough for the helicopter (further discussion below).

Table 7. Akutan Annual Essential Air Service Subsidies

<b>Approx Year*</b>	<b>Helicopter Annual Contract Subsidy Rate (USD \$)</b>	<b>Fixed-Wing Annual Contract Subsidy Rate (USD \$)</b>
2019	\$ 846,978	\$ 924,959
2020	\$ 874,832	\$ 951,170
2021	\$ 905,439	\$ 1,037,523
2022	\$ 914,240	\$ 1,062,726
2023*	\$ 1,040,113	\$ 1,550,110
2024*	\$ 1,098,078	\$ 1,706,657
2025*	\$ 1,152,195	\$ 1,860,691

Note: \*Exact dates of contract period can vary. 2023-2025 annual contract rates are estimated based on EAS proposal DOT-OST-2000-7068 dated October 2022

EAS agreements must be renewed every two years, without any certainty that the agreement will be renewed. Without the funding provided by the EAS, the helicopter would be cost prohibitive and the challenges of the transportation system serving Akutan would become even more extreme. Additional information regarding costs for EAS are included in the following sections.

The EAS agreement includes a schedule of 2 round trip flights per day (morning and afternoon) 6 days per week, with no flights on Sundays.

Starting in 2012, the Aleutians East Borough committed to providing access between Akutan and the Akutan Airport (on Akun Island) for a period of 20 years which would expire in 2032. The Aleutians East Borough has provided a subsidy for the helicopter of an annual value equivalent to the EAS subsidy payment for the helicopter. Further subsidies would require the borough assembly to approve an extension prior to 2032. The other potential path starting in 2032 would be a shift of the financial burden for the helicopter to the City of Akutan. For purposes of this analysis, it is assumed that the current transportation network will be maintained regardless of the entity paying for the service.

The cost for the helicopter service is funded through a combination of Essential Air Service grant funds and the Aleutians East Borough under two-year contractual agreements. Under the grant, the US Department of Transportation agreed to cover 50 percent of the helicopter expenditures between Akutan and Akun. The DOT established an annual subsidy rate of \$905,439 for the period from April 1, 2021, through March 31, 2022, and \$914,240 for the period from April 1, 2022, through March 31, 2023 for this helicopter service. As part of that agreement, the AEB provides support services to Maritime Helicopters for operations according to an agreement with the US Department of Transportation. Expenses related to the EAS contract proposed for 2023 can be found in Table 8, and detailed information found in Appendix C: Economics.

Table 8. 2023 Proposed Annual Essential Air Service Helicopter Contract Rate

<b>Direct Expenses</b>	<b>\$</b>
Pilot Payroll Expenses	250,000
Aircraft Operating Expense	796,500
Aircraft Fuel	189,924
Insurance	79,981
<b>Indirect Expenses</b>	
Akutan Base Indirect Expenses	580,262
Administrative Costs	284,500
Total Operational Costs	2,181,167
5% Profit Margin	109,058
<b>Total Cost</b>	<b>2,290,225</b>
Minus Total Estimated Revenue	210,000
<b>Estimated Annual Subsidy for Service</b>	<b>2,080,225</b>
Estimated DOT Subsidy - 50%	1,040,113
Estimated AEB - 50%	1,040,113

### 3.4.1.3 Fixed-wing Service

Access to the airport on Akun is provided by fixed-wing aircraft out of Unalaska-Dutch Harbor, Alaska. A Piper PA31-350 Navajo Chieftain is a 10-passenger twin-engine plane generally operated between Dutch Harbor and Akun Island. These flights are provided under the EAS program and include 12 weekly nonstop round trips between the Akutan Airport located on Akun Island and Unalaska, weather permitting. Flights are scheduled twice daily, six days a week (with no flights on Sundays) but the regular schedule may be altered due to demand. The airline (EAS provider is currently Grant Aviation) will also adapt their schedule to get passengers/freight moved when there is high demand or when there has been a backlog due to weather closures. In addition to scheduled flights, charter flights are also available.

Grant Aviation fixed-wing aircraft flights from 2020 to 2022 to Akutan airport were reported to be canceled on average 34% of the time due to weather. This is higher than the 20% cancellation predicted by crosswind analyses (see Appendix A), likely because factors such as weather at the point of departure, fog, or wetness of the runway are not included. Maritime helicopters had an average of 30% of their flights canceled due to weather over the same time period. Helicopters are better able to travel through cross winds but may cancel due to fog. Fixed-wing aircraft would control airport access for the harbor alternative. In other words, the harbor alternative only supports passengers that are able to board a ferry vessel because the fixed wing aircraft was able to fly from Unalaska to Akutan Airport. Note that these statistics reflect weather cancellations of scheduled trips, and the fixed-wing and helicopter operators frequently run “catch-up” trips during good weather.

For the contracted period of April 1, 2021, through March 31, 2023 the Department of Transportation established subsidy rate of \$1,037,523 for the period from April 1, 2021,

through March 31, 2022, and \$1,062,726 for the period from April 1, 2022, through March 31, 2023 for this service provided by the fixed-wing aircraft.

#### **3.4.1.4 Maritime Helicopters**

Maritime Helicopters provides flight services between the Akutan Airport on Akun Island to the community of Akutan. Prior to helicopter operations, a hovercraft was utilized to transport passengers back and forth from Akutan to Akun. The 4-passenger Bell 206L4 helicopter is stationed in Akutan and replaced the hovercraft in 2014, as a more reliable and affordable option when compared to the hovercraft. Passenger/trip data for the hovercraft service are unavailable.

#### **3.4.1.5 Local Vessel Access**

Skiffs are small, open, flat-bottomed boats that are commonly owned by residents of Akutan and used for both commercial and subsistence harvesting. Currently, skiffs are launched on rocky beach areas around the community of Akutan or from a narrow ramp near the Skiff Harbor. Larger vessels capable of commercial fishing seek transient moorage at the Skiff Harbor and at the Akutan Harbor.

Residents use their skiffs to cross Akun Strait to reach Akun Island during optimal weather windows only, most commonly during summer months. Current practice is for skiffs to cross over to Akun Island during the slack tide, or else head north of the strait before heading south to Akun Island to avoid standing waves and strong tidal currents off the west coast of Akun Island. Information related to currents, tidal rips, and wave climate is available in Sections 3.1.3 and 3.1.4.

On Akun Island, skiffs are tied or dragged onto the beach. However, skiffs are not generally left unattended on Akun Island and at least one community member often stays behind with the vessel. This prevents that individual from engaging in subsistence or other activities on Akun Island with the remainder of their group.

### **3.4.2 Subsistence Use**

Subsistence is the non-commercial, traditional, and customary harvest of renewable resources for food, clothing, fuel, transportation, construction, arts, crafts, sharing, and customary trade. These uses of wild resources are of important cultural and economic value in rural Alaska.

As in common in many Alaskan communities, subsistence activities in Akutan are an important source of food and cultural tradition. The community of Akutan is a mixed subsistence-cash economy. The term “mixed economy” has special implications in rural areas of Alaska. In the Alaska-style mixed economy, households typically follow a pattern of activity that combines employment for cash with traditional fishing and hunting. Subsistence gathering contributes to the household food supply and provides building material, fuel, and raw material for tools, clothing, and arts and crafts.

Cash income from employment (most often limited to seasonal income) is used to obtain modern technology to support the gathering of wild resources. Use of modern equipment, such as snowmachines, power boats, nets, rifles, and traps, enables individuals to continue to participate successfully in traditional activities across greater distances.

Most Akutan households attempt to harvest subsistence resources from around the Akutan/Akun islands area and, due to sharing practices, all permanent year-round residents use wild resources. The most commonly harvested species are halibut, sockeye salmon, Steller sea lion, Pacific cod, feral cattle, coho salmon, pink salmon, harbor seal, and ducks. Residents also harvest clams; game birds; eggs; berries, including blueberries, salmonberries, and crowberries; and marine invertebrates, including chitons, king and tanner crab, and octopus. Fishes account for over half of the subsistence harvest in Akutan. Besides halibut, cod, and salmon, other fish species harvested include greenling, flounder, sole, herring, black rockfish, sculpin, and trout (USACE 2004).

In a 2008 study, 100% of Akutan households received and used (“used” refers to if a household ate, processed, harvested, or received a resource from other households) at least one wild resource for subsistence (Schmidt 2018). In addition, 97% of households engaged in fishing, hunting, or gathering activities, and 86% of households shared at least 1 resource with other households. Akutan households used an average of 17 resources and a maximum of 42 resources per household. On average, households attempted to harvest 10 kinds of resources (with a maximum of 41) and succeeded in harvesting an average of 9 resources (with a maximum of 38 harvested). On average, households gave away 8 resources to others and received on average 12 resources.

Harvests amounts and species vary from year to year due to a variety of factors. For example, salmon harvests depend heavily on which species of salmon is running and can vary from year to year. Plant harvests can vary based on rain amounts and temperatures. To compensate for this variability between years, harvest species and amounts have been estimated through a variety of survey efforts by the state of Alaska and other institutions and average harvest levels have been identified. Data gathering for these efforts consisted of repeated in-depth household subsistence use surveys and mapping.

In 2008 (which is considered a representative year by ADF&G), the community of Akutan harvested nearly 27,000 pounds of wild foods, averaging 327.3 lb per capita. This compares to a 2015/16 survey done by the University of Alaska Institute of Social and Economic Research (Schmidt 2008) that estimated Akutan subsistence harvests at 439 pounds per capita. Detailed harvest information is available for 2008. In that year, salmon made up the largest portion and contributed 45% of the harvest and averaged 146 lb per person; followed by fish other than salmon (25%, 80 lb); shellfish (10%, 34

lb); marine mammals (8%, 26 lb); wild plants and berries (5%, 16 lb); land mammals (4%, 15 lb); and birds and eggs (3%, 10 lb.).

### 3.4.3 Cultural Resources

#### 3.4.3.1 Historical Background

The early history of the Aleutian Islands is poorly understood. The cultural phases used by archaeologists and historians have been created by weaving together data collected from archaeological excavations from across many different islands (Table 9). The eastern Aleutian Islands have been occupied by the Unangan since at least 9,000 years before present (BP) (Knecht and Davis 2001). The oldest known occupation on Akun Island occurred at the Sanağan site, which was radiocarbon dated to approximately 5,000 BP (CRC 2016).

Table 9. Known cultural phases in the eastern Aleutian area (CRC 2016).

Cultural Phase	Dates	Cultural Materials Description
Early Anangula Phase	9000-7000 BP	Large stone blades, microblades, burins, scrapers, stone vessels, abraders, net sinkers, bowls, oil lamps, and ocher grinders.
Late Anangula Phase	7000-4000 BP	Bifacial retouched tools, stemmed projectile points, “bell-shaped” scrapers, bipointed and leaf-shaped projectile points, composite fishhooks, gorges, eyed needles, and bi-laterally barbed harpoon points.
Margaret Bay Phase	4000-3000 BP	Bone socket pieces, wedges with drill holes, bone bi-points, unilateral barbed harpoons, labrets, ground slate tools, ground jet ornaments, stemmed stone points, bullet shaped points, scrapers, polished adzes, fine pressure flaked stone, and incised artwork.
Amaknak Phase	3000-1000 BP	Toggling harpoons, foreshafts, wide variety of knife and scrapers, with stylistic additions to barbing styles, highly decorated hunting equipment.
Late Aleutian Phase	1000-200 BP	Ground slate tools replaced almost all chipped stone tools, with continuation of bone tools from earlier phases.

#### 3.4.3.1.1 Russian Period

The Russian Period begins in AD 1741, when the Bering Expedition first arrived in the Aleutian Islands. Russian fur traders first entered the Krenitzin Islands, which include Akun Island, in 1766, 25 years later. Captain Afanasii Ocheredin of the *Sv. Pavel*



ordered one of his crew foremen, Matvei Polozkov, to explore the area in August the following year. Polozkov established his main camp on Akun Island but left contingents on Akutan and other islands in the Krenitzin group (Black 1999).

An expedition commanded by Captain Krenitzyn dropped anchor in Captains Bay in Unalaska Island in 1768. During the voyage, Krenitzyn sent his navigator to shore for fresh drinking water on Akutan Island, where he noted the presence of a summer village with five houses. In an expedition led by Captain Levashev three weeks later, his navigator reported that, while searching for a suitable harbor at Akutan Island, he encountered a settlement of two semi-subterranean dwellings (Black 1999).

All six islands of the Krenitzin group were inhabited by Unangan communities as late as 1790. Akun boasted seven villages in 1790 (Agida, Chulka, Saa, Kadan linaguk, Kazhik, Sinnagak, and Nukaginax), with an estimated population of 548 to 685. Only three villages remained by 1821, on Akutan, Avatanak, and Akun islands. Their Russian names were Artel'novskoe, Seredki, and Recheshnoe. The settlement at Chulka on Akun was the residence of the Russian-American Company *baidarshchik*, or crew chief, who responsible for the entire Krenitzin group. In 1838, a smallpox epidemic decimated the regional population, but both Akutan and Akun continued to be prosperous (Black 1999).

#### 3.4.3.1.2 *American Period*

The American Period begins with the purchase of Alaska from Russia by the United States of American in AD 1867. Eleven years later, the Western Fur and Trading Company opened a trading station at a protected location in Akutan Harbor, which attracted Unangan from elsewhere in the region, including Akun Island. The new residents of Akutan built the first Russian Orthodox Church on the island later that year. The Alaska Commercial Company bought the outpost in 1879 and hired Hugh McGlashan to run the store. Although Chulka on Akun continued to be used as a seasonal hunting camp for many years, Akutan had become the sole village occupied year-round by 1879. McGlashan purchased the Akutan trading post in the 1890s (Black 1999; McGowan 1999; Turner and Turner 1974).

The community of Akutan experienced significant development during the early 1900s. The construction of a whaling processing station by the Pacific Whaling Company was completed in 1912, as well as the Alexander Nevsky Chapel in 1918 to replace the previous Russian Orthodox Church (DCRA 2023). A Post Office was established at Akutan in 1914, as it had become the primary community in the Krenitzin Islands (Orth 1967).

#### 3.4.3.2 *Known Cultural Resources*

Archaeological sites have been recorded within and around the project area (Figure 31). This includes the Surf Bay Archaeological District (UNI-00103), which is eligible for the National Register of Historic Places (NRHP), and Sanağan (UNI-00125) which

contributes to the Surf Bay Archaeological District (AHRs 2022). USACE conducted a literature review of this region and found that numerous surveys and excavations have been conducted in this area (Bank 1974; CRC 2006, 2010, 2016; Holland 1992; Morrison 2016; Spaulding & Pierce 1954; Turner 1972, 1974, 2002; Turner & Turner 1974). No underwater shipwrecks or other submerged cultural resources are known to be in the project area (BOEM 2011, NOAA 2023).



Figure 31. Surf Bay Cultural District and Approximate Locations of identified sites

### 3.4.4 Environmental Justice and Protection of Children

Executive Order (EO) 12898, February 11, 1994, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," directs Federal agencies to identify and address any disproportionately high and adverse human health or environmental effects of their actions on low-income, minority, and tribal populations, to the greatest extent practicable and permitted by law. An Environmental Justice analysis typically includes the following elements:

- Identification of any minority and/or low-income status communities in the project area;
- Identification of any adverse environmental or human health impacts anticipated from the project; and
- Determination of whether those impacts would disproportionately affect minority and/or low-income communities.

An executive order associated with Environmental Justice is EO 13045, April 23, 1997, “Protection of Children from Environmental Health Risks and Safety Risks,” which directs Federal agencies to identify and address environmental health and safety risks that may disproportionately affect children, to the greatest extent practicable and permitted by law. This analysis typically includes a determination of whether the identified adverse environmental or human health impacts anticipated from the project would disproportionately affect children.

EO 14096, April 21, 2023, “Revitalizing our Nation’s Environmental Justice for All,” directed Federal agencies to advance environmental justice by implementing and enforcing the nation’s environmental and civil rights laws as well as investing in communities. EO 14096 builds upon EO 12898 and reaffirms the Federal government’s commitment to Environmental Justice. Federal guidance on implementation of this EO is anticipated later in 2023.

In accordance with the Assistant Secretary of the Army for Civil Works Memorandum on Implementation of Environmental Justice and the Justice40 Initiative, March 15, 2022, USACE employs the Council on Environmental Quality’s Climate and Economic Justice Screening Tool (CEJST) and the Environmental Protection Agency’s Environmental Justice Screening and Mapping Tool (EJScreen) to provide a consistent government-side identification of communities with environmental justice concerns.

Both EJScreen and CEJST use the Aleutians East Borough Census Tract (Block Group 020130001001) as their unit of analysis. EJScreen lists the total population of this block group as 958, while CEJST lists the total population as 3,385. Both use percentiles to indicate how local residents compare to everyone else in the nation or state. For example, the “58 percentile” for “Low Income” shown in Table 10 means that people living in the Aleutians East Borough have an income level equal to or higher than 58 percent of people living in the United States. In general, an indicator is of concern in an environmental justice analysis if it is at or above the 90th percentile (CEJST 2023).

#### **3.4.4.1 Identification of Minority or Low-Income Populations**

The population of the City of Akutan is 1,584 people as of the 2020 census; however, the year-round resident population is only 113 people. This year-round resident population includes both minority and low-income populations (DCRA 2023). In 2009, it was estimated that 81.1 percent of the year-round resident population was Alaska Native (Fall et al. 2012). The U.S. Census Bureau identifies 157 people living below poverty level in Akutan, but it is not clear what the income and poverty levels of the year-round resident population are (DCRA 2023). Although none of the socioeconomic indicators associated with the Aleutians East Borough block group are above the 90<sup>th</sup> percentile when compared to the nation (Table 10), it is important to note that the Federal government considers all Alaska Native Villages to be disadvantaged communities (CEJST 2023) and that the AEB is too large of a statistical unit to be accurate for the community of Akutan.

Table 10. Socioeconomic Indicators for the Aleutians East Borough (EJScreen 2023)

Indicator	Compared to Nation	Compared to State
Demographic Index	81 percentile	89 percentile
People of Color	85 percentile	92 percentile
Low Income	58 percentile	70 percentile
Unemployment Rate	23 percentile	13 percentile
Limited English Speaking	69 percentile	78 percentile
Less Than High School Education	68 percentile	86 percentile
Under Age 5	34 percentile	23 percentile
Over Age 64	17 percentile	22 percentile

### 3.4.4.2 Identification of Existing Adverse Environmental or Human Health Risks

The existing environmental and human health risks for the Aleutians East Borough only included one risk that was at or above the 90<sup>th</sup> percentile (Table 11). This was the “Lack of Indoor Plumbing” risk under the Housing category. The “Transportation Barriers” risk under the Transportation category, which is especially relevant to this project, had a surprisingly low percentile. CEJST defines transportation barriers as the “average of relative cost and time spent on transportation.” Considering the extremely high costs of transportation in the Aleutians East Borough, it is suspect that the risk is listed as only in the 30<sup>th</sup> percentile in comparison to elsewhere in the nation. The barrier transportation data was provided to the Council on Environmental Quality by the U.S. Department of Transportation (DOT); it is unclear whether their data include marine and air travel, which are the primary modes of transportation in the Aleutians East Borough. The “underlying indicators and sources” in the DOT’s definition of disadvantaged communities, which appears to be the data used by CEJST for their transportation barriers risk, includes variables including “drive time” and vehicle ownership (DOT 2023).

Table 11. Existing Environmental Conditions and Human Health Risks for the Aleutians East Borough (CEJST 2023)

Category	Existing Risk	Compared to Nation
Climate Change	Agriculture Loss Rate	<i>No data</i>
	Building Loss Rate	1 percentile
	Population Loss Rate	55 percentile
	Flood Risk	<i>No data</i>
	Wildfire Risk	<i>No data</i>
Energy	Energy Cost	83 percentile
	Particulate Matter 2.5	<i>No data</i>
Health	Asthma	14 percentile

	Diabetes	63 percentile
	Heart Disease	31 percentile
	Low Life Expectancy	1 percentile
Housing	Housing Cost	19 percentile
	Lack of Green Space	<i>No data</i>
	Lack of Indoor Plumbing	94 percentile
	Lead Paint	25 percentile
Legacy Pollution	Abandoned Mine Land	No
	Formerly Used Defense Site	Yes
	Proximity to Hazardous Waste Facilities	0
	Proximity to Risk Management Plan (RMP) Facilities	74 percentile
	Proximity to Superfund Sites	0
Transportation	Diesel Particulate Matter	0
	Transportation Barriers	34
	Traffic Proximity and Volume	<i>No data</i>
Water & Wastewater	Underground Storage Tanks and Releases	5 percentile
	Wastewater Discharge	<i>No data</i>

To calculate an environmental justice index (Table 12), EJScreen uses a formula to combine a single environmental factor with the demographic index (which averages low income and people of color populations). Explanations of what each index means can be found online at the Environmental Protection Agency’s website “Overview of Environmental Indicators in EJScreen” (EPA 2023).

It is important to note that while the data from both tools is reported here, these tools do not provide information at a data level useful for many areas in Alaska, especially in remote Alaska Native communities in the Aleutian Islands.

Table 12. Environmental Justice Index for the Aleutians East Borough (EJScreen 2023)

Index	Compared to Nation	Compared to State
Particulate Matter 2.5	N/A	N/A
Ozone	N/A	N/A
Diesel Particulate Matter	0	17 percentile
Air Toxics Cancer Risk	0	0
Air Toxics Respiratory HI	2 percentile	0
Traffic Proximity	N/A	N/A
Lead Paint	60 percentile	85 percentile
Superfund Proximity	0	3 percentile
RMP Facility Proximity	91 percentile	98 percentile

Hazardous Waste Proximity	0	44 percentile
Underground Storage Tanks	52 percentile	59 percentile
Wastewater Discharge	N/A	N/A

## 4.0 FUTURE WITHOUT-PROJECT CONDITIONS

This section provides forecasting of conditions that are expected to persist in the Akutan and Akun Islands, Alaska, in the absence of navigation improvements. The Future Without Project Condition (FWOP) forms the basis from which alternative plans are formulated and impacts are assessed. The period of the analysis is 50 years, beginning with the base year of 2033, the year of expected construction completion and the start of accrual of project benefits.

### 4.1 Physical Environment

Under FWOP, there are no anticipated changes expected to the physical environment in the project area. Changing sea conditions and potential sea level rise (Section 3.1.15, “Climate Change”) could result in unknown changes to the storm conditions and increased wave height at Surf Bay and throughout the Aleutian Islands generally.

### 4.2 Natural Environment

The Aleutian Islands are a dynamic ecological region. While there is no way of knowing with certainty what the future condition of the ecological baseline at Akun Island without the implementation of the project would be, the reasonable continuation of existing processes helps guide these assumptions. Given the limited development on Akun Island and the logistical difficulty of completing large-scale construction projects in the Aleutian Islands, there are limited opportunities for projects at the proposed project site in the foreseeable future. In the absence of this type of anthropogenic influence, the Akun Island site is expected to maintain its current ecological function.

### 4.3 Built Environment

The FWOP conditions for the Built Environment mirror those under the existing conditions. It is assumed the Akutan Harbor and road, City Dock, Skiff Harbor, the Trident Dock, and the Akutan Airport facilities that support maritime and air service to Akutan would continue to operate at the same level as has been experienced in the past.

### 4.4 Socio-Economic Resources

The future without-project conditions mirror those under the existing conditions. All these conditions would continue to limit the community’s ability to develop a stable and sustainable local marine resource economy sufficient to support their mixed, subsistence-cash economy.

#### **4.4.1 Population and Demographics**

The resident population of Akutan has remained relatively stable over time, averaging between 55 and 169 people since 1880, with a 2020 population of 113 individuals (see Section 3.1 for additional information.) At this time, there is no reason to assume significant growth or decline in the permanent resident population of the community and this population is assumed to remain static through the forecasted study period.

#### **4.4.2 Employment and Income**

As this project is formulated for the community of Akutan, rather than for the transient population of the Trident Seafoods processing plant, transient workers are not included in the FWOP baseline. It is worth noting, however, that there is significant uncertainty related to the future of operations of the Trident plant in Akutan and the company is currently researching the feasibility of closing the Akutan based plant and building a new facility in Dutch Harbor. If this were to occur, while the baseline resident population utilized in this analysis would not change, the high cost of the helicopter contract and the impact of weaknesses with the FWOP condition transportation network on long-term community viability would become even more critical after losing the fish tax.

#### **4.4.3 Existing Infrastructure and Facilities**

In future without project conditions, it is assumed that the residents of Akutan will continue to utilize the existing maritime and upland infrastructure and facilities on Akutan and Akun Islands.

#### **4.4.4 Freight & Fuel Delivery**

No shift in fuel and freight operations is anticipated under FWOP conditions. It is assumed that deliveries will continue directly to Akutan via barge, with twice annual fuel barrel deliveries to occur from Akutan to Akun via helicopter or skiff in support of airport operations.

It is not anticipated that an aircraft refueling system would be installed on Akun in FWOP conditions, as interviews with aircraft operators indicated that a fuel system on Akun would be very costly to install and maintain and would require testing to maintain aircraft fuel quality.

#### **4.4.5 Transportation**

Transportation between the Akutan airport on Akun Island and the community of Akutan will continue to rely on the costly helicopter service in FWOP, which is often hindered by weather. Essential Air Service subsidy which provides supporting funding for the helicopter must be renewed every two years, and no backup plan currently exists to maintain the transportation link to the community if that subsidy were to not be renewed.

This is considered unlikely and the FWOP assumption is that the subsidy (and service) is maintained. The Coast Guard will continue to be called in for medical emergencies when weather conditions prevent fixed-wing flights to Akun. Air transportation to medical appointments off island will continue to be delayed, and USPS deliveries of medicines needed from Anchorage will continue to be delayed because of the delays in mail from Anchorage. Delays in delivery of medications can reduce the quality of life and can cause worsening medical conditions.

#### **4.4.5.1 Alaska Marine Highway System**

For purposes of this analysis, it is assumed that AMHS service to Akutan continues at the same level as has been experienced in the past.

#### **4.4.5.2 Fixed-wing Service**

It is assumed that in FWOP conditions the fixed-wing service to Akun will continue to operate similarly to the existing conditions.

While participation in the EAS subsidy must be renewed every two years, no changes to the EAS service provided by Grant Aviation are anticipated under FWOP conditions. In support of these assumptions, Grant applied for an expanded service period of 3 years (beyond the typical 2-year service period) to EAS for the service window starting in 2023, showing interest in maintaining the service to the island. In addition, a similar but competing regional carrier also expressed interest in the service contract.

#### **4.4.5.3 Helicopter Operations**

It is assumed that in FWOP conditions the helicopter service will continue to operate similarly to the existing conditions.

In FWOP, the required skiff-based transit to and from the hanger will be eliminated since a road to the Akutan Harbor is being constructed.

While participation in the EAS subsidy must be renewed every two years, no changes to the EAS service provided by Maritime Aviation are anticipated under FWOP conditions. Maritime (similarly to Grant Aviation) applied for an extended 3-year EAS contract, supporting the assumption that they plan to remain providing service to the community in FWOP.

As was stated in the Baseline Conditions chapter, the Aleutians East Borough committed to providing access between Akutan and the Akun for a period of 20 years after the opening of the Airport, which would expire in 2032. At that time, the borough assembly would need to approve an extension if one was desired. The other potential path starting in 2032 would be a shift of the financial burden for the helicopter to the City



of Akutan. For purposes of this analysis, it is assumed that the current transportation network will be maintained regardless of the entity paying for the service.

#### **4.4.5.4 Local Vessel Access**

It is assumed that in FWOP conditions the residents of Akutan will continue to choose to utilize their personal vessels to access Akun Island at a similar rate when compared to historical and existing conditions.

#### **4.4.6 Subsistence Use**

Subsistence is a long-term practice that is critical to the culture and traditions of Akutan residents, and shifts tend to be measured in terms of generations rather than years and significant shifts are not anticipated.

#### **4.4.7 Cultural Resources**

The cultural resources at Surf Bay have been subjected to natural erosional forces from wind as well as wave and storm damages for thousands of years. The feral cattle on Akun Island also cause ground disturbances which impact cultural resources. These issues may continue to impact cultural resources on Akun Island. It is not anticipated that these conditions would change in the FWOP.

#### **4.4.8 Environmental Justice and Protection of Children**

There are no anticipated changes in FWOP conditions related to Environmental Justice and the Protection of Children over the existing conditions.

### **4.5 Summary of Without Project Condition**

A key point of uncertainty is the future of the Trident Seafoods plant in Akutan. Due to multiple reasons including this uncertainty, the population of transient workers that service the plant are not considered as part of this analysis. However, if Trident Seafoods were to cease operations in Akutan the fish tax would no longer be received by the community or the Aleutians East Borough, making the high cost of annual helicopter service even more prohibitive.

Under the FWOP condition, absent federal action to provide navigation improvements to Akutan, transportation cost inefficiencies and negative impacts to the community of Akutan are expected to continue at a level rate.

There are no anticipated changes expected to the physical, natural, or built environment in the project area.

## **5.0 FORMULATION AND EVALUATION OF ALTERNATIVE PLANS**

### **5.1 Plan Formation Rationale**

Plan formulation is the process of building alternative plans that meet planning objectives and avoid planning constraints. Alternatives are a set of one or more management measures functioning together to address the study objectives. A management measure is a feature or activity that can be implemented at a specific geographic location to address one or more planning objectives. A feature is a “structural” element that requires construction or assembly on-site, whereas activity is defined as a “nonstructural” action.

### **5.2 Plan Formulation Criteria**

Alternative plans were formulated to address study objectives and adhere to study constraints. As part of Federal guidelines for water resources projects, there are general feasibility criteria that must be met. According to the USACE ER 1105-2-100 for planning, USACE projects must be analyzed with regard to the four criteria defined in Section 2.7.

In addition to these criteria used for all potential USACE water resource development projects, a study-specific CE/ICA metric of access capability between sites has been identified. Access Capability directly impacts waterborne transportation for Akutan, particularly given the integral significance that the ability to access their airport is to the long-term viability of the community.

### **5.3 Management Measures**

During the November 15-16, 2021, planning charrette in the community of Akutan, sixteen measures were identified. Using the criteria discussed in Section 2.7, “National Evaluation Criteria,” the project delivery team (PDT) evaluated the following structural and non-structural measures. All ideas from charrette attendees are identified in Table 8 and Table 9. The PDT screened the considerations proposed at the charrette and determined if they qualified as a measure that would address the problem in Section 2.1 and were screened on the basis of meeting the study objectives described in Section 2.4. Discussion is provided in Sections 5.3.1 and 5.3.2 to explain if each item was considered a measure to address the problem and why the measures were either carried forward or screened from further consideration. Considerations that did not qualify as a measure were not considered further. These measures were combined to form the alternatives outlined in Section 5.7, “Description of Alternative Plans.”

#### **5.3.1 Non-Structural Measures**

Non-structural measures are those measures that reduce the consequences of vessel delays and utilize currently available resources. Five non-structural measures were developed during the planning charrette and compared to the study objectives (Table 13).

Table 13. Non-Structural Considerations Identified at the Charrette

Measure Name	Study Objectives		
	Provide sustainable, safe, reliable access to Akutan Island.	Improve key service operations such as mail and medical supplies between Akun Island and Akutan Island.	
Non-Structural (under USACE authorities)	Does the measure meet the study objectives?		Measure carried forward?
Meteorological equipment	No	No	No
Procedural control for harbor accessibility / limitation	No	No	No
Investigate a modern seaplane to go back to pre-2012 operations	Yes	No	No
A bridge from Akutan Island to Akun Island	Yes	Yes	No
Lightering passengers/cargo to Akutan Harbor (if no road)	Yes	Yes	Yes*

After the charrette, the PDT screened the non-structural considerations identified at the meeting and determined whether these were measures or opportunities that could be realized with implementation of a harbor improvement project. The following list details the various non-structural considerations identified during the charrette and how they were screened or carried forward for further consideration.

- Meteorological equipment is currently available in the Akutan/Akun area. A NOAA tide gauge is located Unalaska, with established benchmarks at Surf Bay and Akutan. The Akutan Airport (7AK) provides real-time meteorological data as well as a live web camera.
- Procedural controls for harbor accessibility are required at any developed harbor.
- Consideration of a modern seaplane to go back to pre-2012 operations does not meet the basic objective of connecting the Akutan Airport with the community of Akutan, as a seaplane would utilize facilities at the community of Akutan rather than at the Akutan Airport on Akun Island.

- A bridge between Akun and Akutan is not a structure that USACE can construct under its navigational authorities.
- Lightering was initially considered for passengers/cargo transported to and from the Akutan Harbor. A road from the community of Akutan to the Akutan Harbor has been funded and designs have been developed. Permitting for the road is underway with materials to be stockpiled in 2023 and construction to be completed in 2024, so while this measure was initially carried forward it is no longer a consideration as goods would be able to be transported over the road once it is constructed.

### 5.3.2 Structural Measures

Structural measures are generally those measures that improve access to Akutan and require construction and new materials. The structural measures discussed during the charrette are shown in Table 14.

Table 14. Structural Measures Identified at the Charrette

Measure Name	Study Objectives		
	Provide sustainable, safe, reliable access to Akutan Island.	Improve key service operations such as mail and medical supplies between Akun Island and Akutan Island.	
Structural	Does the measure meet the study objectives?		Measure carried forward?
Rock Breakwater	Yes	Yes	Yes
Protected Moorage	Yes	Yes	Yes
Dredging	Yes	Yes	Yes
Blasting	Yes	Yes	Yes
Jetties	Yes	Yes	Yes
Road	Yes	Yes	Yes
Docks	Yes	Yes	Yes
Harbor support facilities	Yes	Yes	Yes
New or updated seaplane base	Yes	No	No

Nine structural measures were identified during the charrette. After the charrette, the PDT screened the structural measures to determine which items should be carried forward into the initial array of alternatives. The following list details the structural measures and whether they meet the study objectives for the implementation of a project

- Breakwaters provide protected moorage and safe maneuverability to a turning basin, docks and harbor facilities. A breakwater would be sufficient to reduce wave action to the harbor and provide safe access. A breakwater was carried forward as a structural measure for consideration in the development of the initial array of alternatives.
- Moorage, turning basins and entrance channels are harbor navigation components that would be evaluated to improve safe maneuverability and protected moorage. These measures were carried forward and would be combined as appropriate for the development of the initial array of alternatives.
- Dredging and blasting to create navigation/entrance channels or deepen an existing channel or basin for safe maneuverability would be evaluated to reach the desired depth to realize benefits for the vessels utilizing the entrance channel and basin. Dredging and blasting were carried forward and would be combined as appropriate for the development of the initial array of alternatives.
- Docks, roads, and harbor support facilities do not meet either of the study objectives but would all be evaluated as local service facilities to support harbor usage with implementation of the proposed project. These measures would be combined as appropriate depending on harbor configuration and vessel class access in the initial array of alternative to realize harbor benefits.
- A new or updated seaplane base does not meet the objective of improving key services between the Akutan Airport on Akun Island and the community of Akutan.

#### **5.4 Design Vessel**

A conceptual design vessel is utilized to identify baseline requirements that satisfy the purpose the vessel will be serving (ferry service). These requirements can include passenger capacity, passenger comfort and seasickness, and cargo type or capacity. The dimension (length, beam, draft) of the design vessel is used in defining the required mooring and berthing facilities.

Initial design vessels up to 95 feet were considered. Feedback during the charrette was that this size of vessel would make crossing Akun Strait most comfortable for passengers. The size of vessel was gradually reduced to 58 feet to minimize the harbor requirements for a vessel that was able to safely operate in that environment. The type

of design vessel selected for this study can be represented by the *F/V Magnus Martens*, a 58-foot twin screw steel monohull with a 26-foot beam and an 8-foot draft (Figure 32). Vessels similar to the *F/V Magnus Martens* operate across Alaska, including in the Aleutian Islands. During the charrette, local fishermen stated that a 58-foot vessel would be the minimum recommended length to cross Akun Strait safely. It is anticipated that the ferry vessel would be a converted commercial fishing vessel capable of transporting up, although a crew boat similar to those used in the oil and gas industry is also a possibility.



Figure 32. Design Vessel *F/V Magnus Martens* (photo fredwahlmarine.com)

The characteristics required in the design vessel are heavily influenced by wave/tide conditions when transiting Akun Strait, between Akutan and Akun Islands. Passenger counts and freight requirements are not a limiting characteristic since any vessel that can handle the marine conditions in the Akun Strait will meet the passenger/freight capacity of the fixed-wing. Changes in demand could impact trip counts in FWOP, but the FWP design vessel size is already minimized and is not likely to be further reduced.

It should be noted that this design vessel will be referred to as a ferry, operating between Akutan and Akun Islands, and should not be confused with the AMHS ferry *M/V Tustumena* described in Section 3.4.1.0.

### 5.4.1 Vessel Operations

This type of vessel can be expected to conduct operations in Beaufort Sea State 3 (BSS3) with a windspeed of 7 to 10 knots and a maximum wave height of 3 feet and survive in BSS4 with a windspeed of 11 to 16 knots and a maximum wave height of 5 feet. Wave conditions originating from 290°- 330° and 160°- 220° would filter through the Akun Strait and impact the ability of the ferry to operate for the percent of time shown in Table 15 below.

Table 15. Design Vessel Expected Operational Conditions

Likely Operation	Cease Operation
Seas 5 feet or less	Seas greater than 5 feet
Winds 20 knots or less	Winds greater than 20 knots
Tide 0.0 feet MLLW or greater	Tide less than 0.0 feet MLLW
78%	22%

Note: Statistics are based on significant wave heights generated by WIS point 82327 and do not consider fog and maintenance that may also affect operations.

### 5.5 Site Selection

Two locations with suitable site characteristics needed to be identified for this study: existing docking facilities at Akutan utilized for loading and unloading passengers and freight, and potential harbor location sites on Akun Island. In each scenario, the ferry vessel would be berthed in the small boat Akutan Harbor.

#### 5.5.1 Akutan Ferry Vessel Loading Sites

Docking facilities at Akutan were described in Section 3.3, Built Environment, and include Akutan Harbor, Skiff Harbor, City Dock, and Trident Dock. Initial screening of these four locations indicated that the City Dock and Akutan Harbor would be carried forward as potential sites for passenger and freight operations.

The Skiff Harbor is at capacity with local small vessels that can be berthed near the community of Akutan. There are extensive facilities at Trident; however, these are working docks involved in commercial fishing operations and are privately owned.

The City Dock is large enough for the design vessel and has sufficient draft, however, there may be modifications needed to the dock to accommodate the ferry vessel as envisioned for this project. At a minimum, the catwalk with mooring dolphins could be replaced to the appropriate elevation to facilitate boarding and freight/cargo transfer to the ferry vessel.

The Akutan Harbor is an option that may need to be modified for freight/cargo transfer. The ferry would be moored in the small boat Akutan Harbor when not in use. The

Akutan Harbor is currently accessible only by skiff but will be accessible by road in 2024.

### 5.5.2 Akun Island Harbor Sites

Nine potential harbor sites were identified during the charrette. These sites, labeled “A” through “I” in Figure 33, were identified; three at Nick’s Camp, two at No-name Point, two at Darryl’s Point, and two at Chulka Point.

Subsequent screening led to the elimination of six sites by the PDT: three at Nick’s camp (A, B, C), west of Darryl’s Point (G), and both Chulka Point sites (I, H).

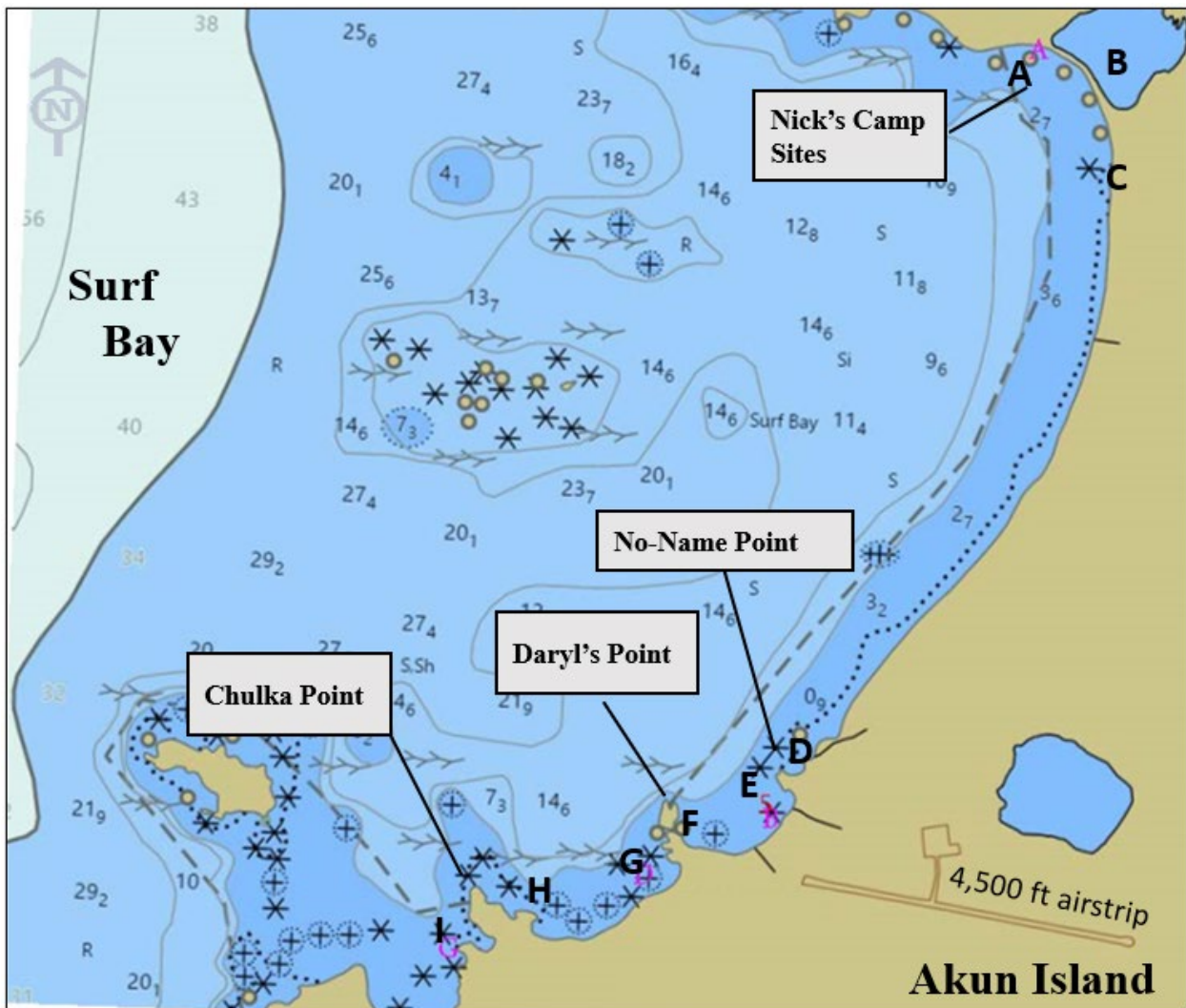


Figure 33. Potential harbor sites identified on Akun Island



### **5.5.3 Akun Sites Screened Out**

#### **5.5.3.1 Nick's Camp (Sites A, B, C)**

Three alternative sites were located approximately 2 miles northeast of the airport at Nick's Camp. This location was advantageous because of its protected location to the northwest, likely removing the requirement for a breakwater. Sites A and C are offshore and would require either a long dock to reach deep water for turning and mooring basin, or a short dock with extensive dredging. Site B involved dredging out the lake and an entrance channel to deep water, with revetments on either side of the lake opening. During the charrette, the team observed shallow water in the lake, even in the middle. Fine sediment around the lake is deposited by the river inlet at the lake's east end and would likely require dredging of Site B on a regular basis.

Ultimately, all the locations at Nick's Camp were ruled out because they would require a lengthy road of approximately 2 miles either over rolling tundra or along the beach and through a cliff face. The project delivery team walked the potential alignment of the road during the charrette, and it was determined that the terrain was too challenging to continue pursuing this location.

#### **5.5.3.2 Daryl's Point (Sites F, G)**

Daryl's Point was identified during the charrette as a potential harbor location. Akutan residents reported that the rock peninsula provides wave protection for Site F, and the area is naturally deep with a sandy bottom at approximately -30 feet MLLW. This site would require much longer road access. Site F is also located inside the Akutan Airport Runway Protection Zone (RPZ). Permanent structures such as breakwaters would have height limits or be not allowed within the RPZ. Therefore, Site F was not carried forward for further analysis. The hillside behind Daryl's Point is also very steep (Figure 34).



Figure 34. View towards Airport from Daryl's Point

Site G is located on the backside of Daryl's Point and does not have the same level of protection from the rock peninsula. Additionally, road access would need to go over the 60-foot-high cliff of Daryl's Point.

#### **5.5.3.3 Chulka Point (Sited H, I)**

Chulka Point sites H and I were quickly ruled out for several reasons. Chulka Point is located farther from the airport than sites D through G, and beaches are surrounded by tall cliffs that would be difficult to access by road. Chulka Point is located closer to the Akun Strait and is subject to higher wave energy than sites to the northwest. Additionally, the backside of Chulka Point (Site I) experiences large tidally-generated waves.

### **5.6 Preliminary Alternatives Considered**

During a screening exercise, the PDT reduced the list of 9 locations to the three most viable (D, E and F) due to their close proximity to the airport and potentially favorable natural wind and wave protection afforded by rocky points.

Three alternatives at two sites were developed using the above measures carried forward. The three preliminary alternative plans developed for this study are shown in Table 16.

Table 16. Preliminary alternatives considered

Alternative	Description
	No Action
1	Harbor Southwest of No-name Point (without blasting)
2	Harbor South of No-name Point (with blasting)
3	Harbor North of No-name point (with blasting)

The General Navigation Features (GNF) structural measures at each location consist of a breakwater, a dredged or blasted entrance channel, and a turning basin. Local Service Facilities (LSF) include a pile-supported dock, turning dolphins, a small mooring basin, an upland area, and a road to connect the harbor with existing facilities at the Akutan Airport on Akun Island. Alterations to existing facilities to serve as a berthing location for passenger or freight loading on Akutan Island may also be necessary (see Section 5.5.1). Also, although not a LSF, the NFS would have to provide the marine transportation vessel or service.

### 5.7 Description of Alternative Plans

The structural and non-structural measures carried forward were combined to form an array of alternatives.

#### 5.7.1 Akutan Facilities

The facility upgrades on Akutan Island will be the same for Alternatives 1 – 3. The sites considered were discussed in Section 5.5.1. At this time, it is assumed that the ferry vessel will moor in Akutan Harbor when not in use. Before each ferry trip, the crew to pilot the ferry vessel would transit to the ferry at Akutan Harbor using the road that has been funded and is currently in development. Two options exist for loading passengers and freight. Either the vessel and crew would travel back to the City Dock where passengers and freight will board the vessel, or passengers and freight would travel to the Akutan Harbor where loading would occur. The ferry will then travel to the proposed harbor on Akun and offload passengers and freight to meet a connecting flight on a fixed-wing aircraft. The ferry will travel back to either the City Dock or Akutan Harbor with any passenger and crew from Akun. Once all runs for the day are completed, the ferry will be moored at Akutan Harbor.

#### 5.7.2 No Action

Existing conditions in Akutan will remain the same without the development of navigation improvements. The current transportation method (helicopter) between the Akutan Airport on Akun Island and the City of Akutan will be expensive and inefficient.

Residents of Akutan would continue to experience reliability concerns for airline passengers, medical supplies, and freight.

### 5.7.3 Alternative 1: Harbor Southwest of No-name Point (without blasting)

This alternative is located at Site E. The harbor would be sized to accommodate a design vessel with a length of 58 feet and a draft of 8 feet. The 715-foot-long rubble mound breakwater would protect a 120 foot by 120 foot turning basin. Both the entrance channel and turning basin would have a dredge depth of -13.0 feet. It is anticipated that blasting would not be required for the turning basin or entrance channel in this location. The entrance channel would have a minimum width of 60 feet to a maximum width of 120 feet when turning around the nose of the breakwater.

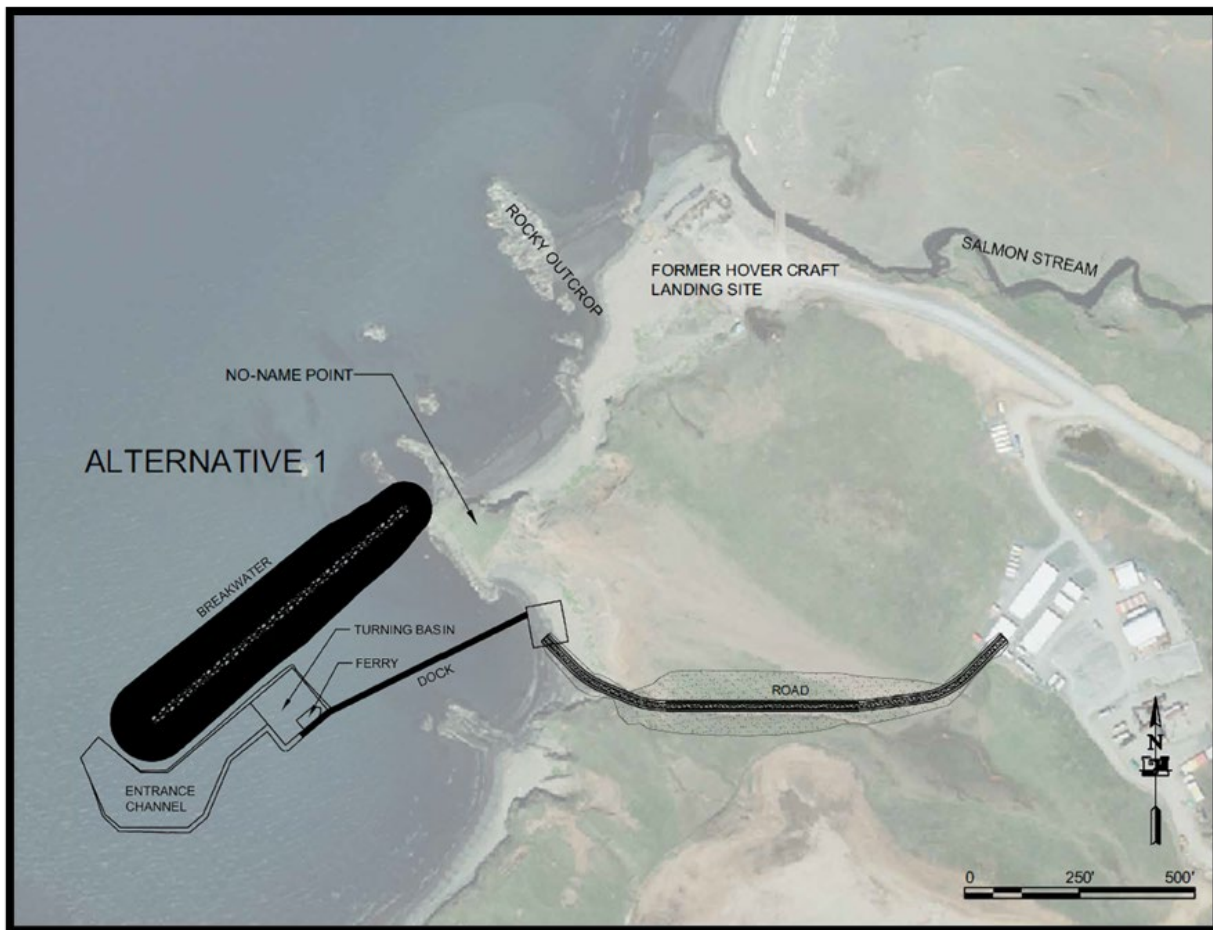


Figure 35. Alternative 1: Harbor Southwest of No-name Point (without blasting)

### 5.7.4 Alternative 2: Harbor South of No-name Point (with blasting)

This alternative is located at Site E. The harbor would be sized to accommodate a design vessel with a length of 58 feet and a draft of 8 feet. The 450-foot-long rubble mound breakwater would protect a 120 foot by 120 foot turning basin. Both the entrance channel and turning basin would have a dredge depth of -13.0 feet. It is anticipated that blasting would be required for the turning basin or entrance channel in this location. The entrance channel would have a minimum width of 60 feet to a maximum width of 120 feet when turning around the nose of the breakwater. Local service facilities required would include a 290 foot long by 12-foot-wide pile-supported dock, turning dolphins, uplands with an area of approximately 0.15 acres for loading/unloading freight from dock, and a 1,100 foot long by 12-foot-wide road connecting the harbor areas with the existing pad to the south of the Surf Bay Inn.

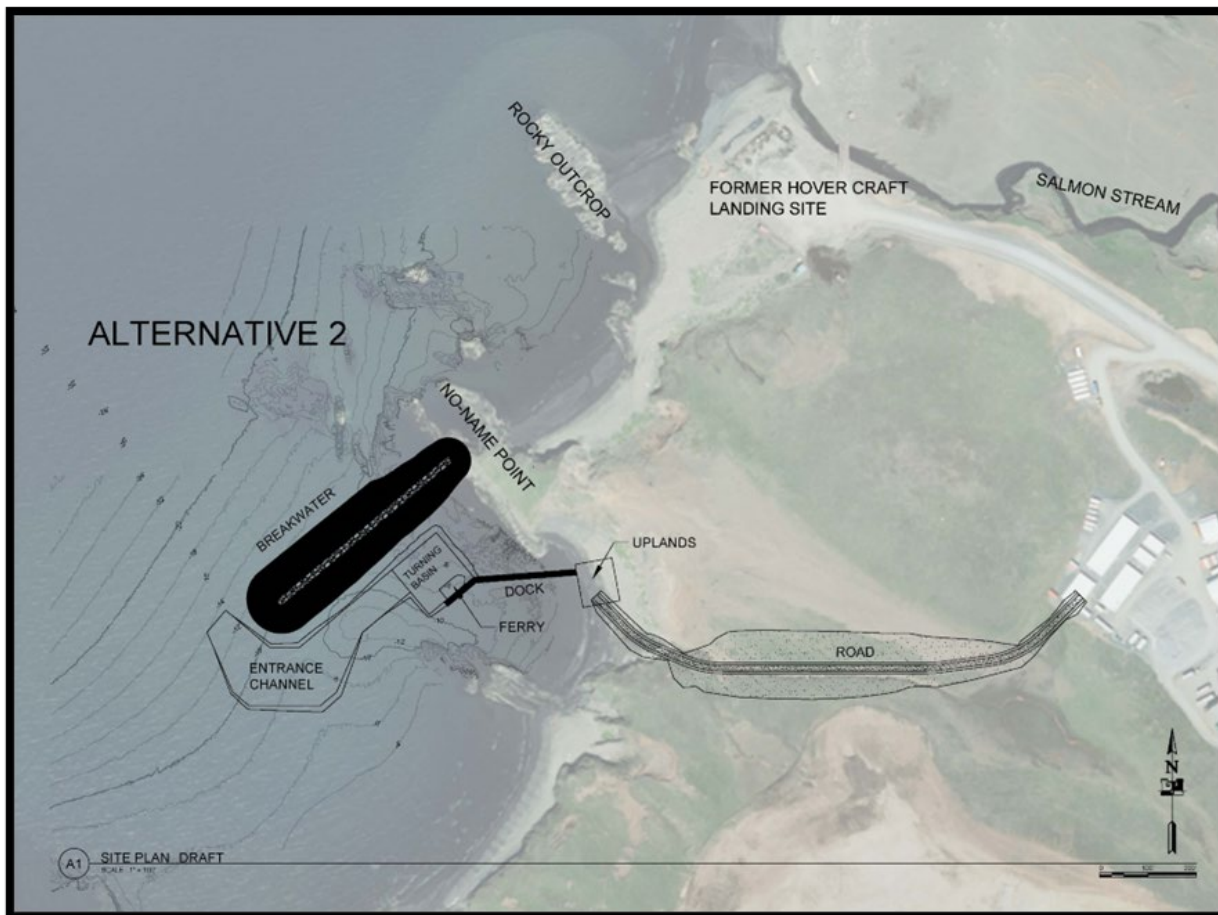


Figure 36. Alternative 2: Harbor South of No-name Point (with blasting).

### 5.7.5 Alternative 3: Harbor Located North of No-name Point (with blasting)

This alternative is located at Site F. The harbor would be sized to accommodate a design vessel with a length of 58 feet and a draft of 8 feet. The 400-foot-long rubble mound breakwater would protect a 120 foot by 120 foot turning basin. Both the entrance

channel and turning basin would have a dredge depth of -13.0 feet. It is anticipated that blasting would be required for the turning basin or entrance channel in this location. The entrance channel would have a minimum width of 60 feet to a maximum width of 120 feet when turning around the nose of the breakwater. Local service facilities required would include a 325 foot long by 12-foot-wide pile-supported dock, turning dolphins, uplands at the existing hovercraft pad for loading/unloading freight from dock, and a 270 foot by 12-foot-wide road connecting the existing hovercraft pad.

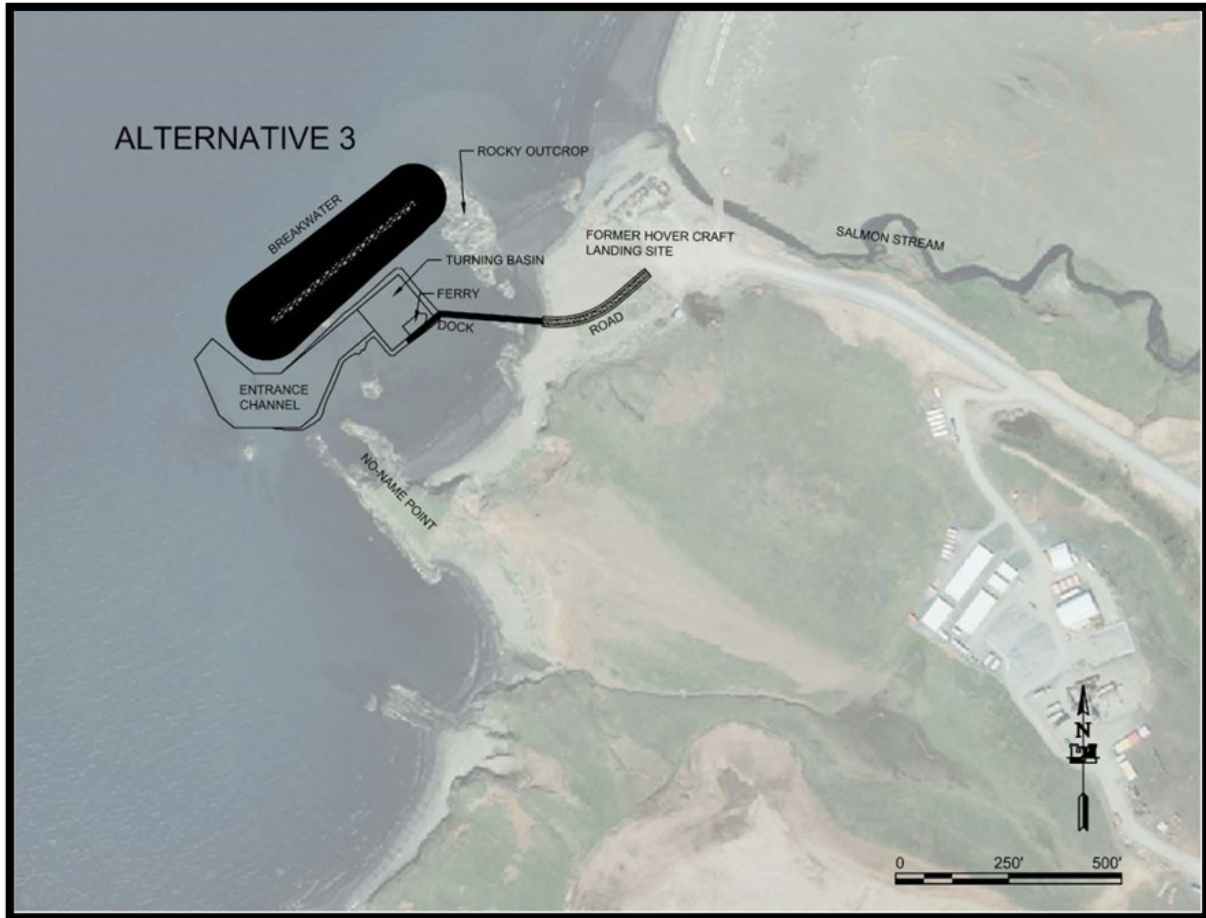


Figure 37. Alternative 3: Harbor North of No-name Point (with blasting)

### 5.8 Alternatives Carried Forward

All alternatives, plus the no action alternative, were carried forward into detailed analysis. These alternatives were further analyzed to establish their benefits across the four accounts (Section 6.4).

## **6.0 COMPARISON AND SELECTION OF PLANS**

### **6.1 With-project Condition**

The following section describes anticipated conditions at Akutan, assuming that a project would be constructed. The anticipated benefits of navigational improvements that provide safe, reliable, and efficient (cost-effective) navigation and mooring for a ferry vessel to transport passengers and cargo between the Akutan Airport on Akun Island and community of Akutan located on Akutan Island are the basis for the economic analysis. The period of the analysis is 50 years, beginning with the base year of 2033. The FY23 Federal discount rate of 2.5% is used to discount benefits and costs.

Alternatives 1 and 2 both utilize the same location. Alternative 1 explores the tradeoff of having the harbor located further offshore and in deeper water to utilize soft material dredging equipment rather than blasting. The cost savings of avoiding blasting are not expected to outweigh having a larger breakwater with heavier armor stone and a longer dock to reach the mooring basin. Only a slight decrease in dredge quantity is realized by Alternative 1 as it is located in a similar depth as the harbor in Alternative 2; however the dredged materials are likely to be different where blasting is used.

#### **6.1.1 Assumptions**

The resident population of Akutan has remained relatively stable over time, averaging between 55 and 169 people since 1880, with a 2020 population of 113 individuals. At this time, there is no reason to assume significant growth or decline in the permanent resident population of the community and this population is assumed to remain static through the forecasted study period.

This project is formulated to meet the transportation needs of the visitors and residents of the community of Akutan. As a large private employer in the community, potential significant shifts in employment levels at the Trident processing facility could occur. In existing and FWOP conditions, the primary method of transportation for Trident workers is via Trident vessels going directly from Unalaska-Dutch Harbor to their Akutan plant. Additional VIP guests, onboard observers for commercial fishing vessels, processing plant inspectors, and airport facility related traffic do utilize the Akutan Airport and the Akun to Akutan transportation link. However, while significant changes to the levels of Trident-specific passengers may occur, the primary formulation of FWP conditions is to meet the needs of the community and therefore shifts in demand levels for Akun to Akutan transportation by Trident employees and visitors do not directly impact FWP benefits.

The AEB has indicated that they do not want to purchase a ferry vessel and will be contracting for ferry services. Therefore, it is assumed that a contract for a marine ferry will be managed similarly to the FWOP condition contract for the helicopter.

Annual trip counts to be made by a ferry in FWP conditions is not critical to this analysis, as it is assumed the trips will be adjusted to meet the transportation needs and weather windows similar to the FWOP condition helicopter service.

All alternatives would accommodate a similar vessel class and allow for utilization of the harbor on Akun. Therefore, differences between FWP benefits are largely dependent on harbor accessibility, focus group response data, and the cost for implementing the alternatives.

All FWP alternatives are expected to take a total Pre-construction Engineering and Development (PED) duration of 30 months, and a construction duration of 30 months (consisting of 3 seasonal construction windows of 6 months each) with construction complete by calendar year end 2032. The base year for benefits (project year one) is estimated as 2033.

## **6.1.2 Transportation**

### **6.1.2.1 Akutan-Akun Island Ferry Operations**

It is anticipated that the Akutan-Akun Island ferry will be operated as a contract (similar to the existing helicopter contract) and that the vessel would not be owned or operated by the AEB.

Transportation times of the ferry are estimated to take 45 –50 minutes each way, plus load and unload times. Compared to 12–18 minutes for a helicopter trip, the trip duration of the ferry would be increased. However, this would be offset by the capacity of the ferry allowing for a single trip to transport a full fixed-wing plane load of passengers (up to 10), luggage, and light freight thereby eliminating the multiple trips required by the helicopter (which only transported 4 passengers). Due to a lack of data on existing condition delay times and uncertainty, and the offset anticipated between the trip count savings for the marine ferry, transportation and delay times are not further quantified for benefit purposes.

#### *6.1.2.1.1 Vessel Operating Cost Methodology*

Bristol Harbor Group, under a contract with the USACE Marine Design Center, conducted a ferry vessel cost analysis. Under this effort, they gathered information under various scenarios including a new vessel build and an existing vessel conversion. For a 58-foot design vessel, the costs include an assumption of 2 crew, and a deck anti-icing system.

In addition, daily contract rates for existing applicable vessels from Prince William Sound and Unalaska – Dutch Harbor, Alaska were also gathered and ranged from \$3,400 to \$4,000 per day or \$1.06 to \$1.25 million per year, respectively. Information from the Marine Design Center estimated an annual contract cost of \$1.35 million per



year for an existing vessel with no conversion. Additional information on estimated daily contract rates is available in Appendix C: Economics.

Based on this analysis, annual contract cost estimates for a 58-foot ferry are shown in Table 17.

Table 17. 58-foot Ferry Annual Total Economic Cost Estimates

	<b>58' New</b>	<b>58' Converted</b>	<b>58' Existing</b>
Operating Expense	\$1,958,951	\$1,586,725	\$1,085,716
Admin Expense	\$143,345	\$143,345	\$143,345
10% Profit on Expenses	\$210,229	\$173,007	\$122,906
<b>Total Economic Cost</b>	<b>\$2,312,525</b>	<b>\$1,903,077</b>	<b>\$1,351,967</b>

Source: Bristol Harbor Group Memorandum dated 07March2023

The 58-foot new vessel option was eliminated from further analysis as the converted and existing vessel options are more much likely. Ultimately, given that the ferry will be managed via an annual contract that will be available for bidding, the annual contract cost is unknown. To allow for this uncertainty, the remaining two cost scenarios (a converted vessel, and an existing vessel) form the basis for the transportation cost savings analysis throughout this study.

#### **6.1.2.2 Alaska Marine Highway System Ferry**

A focus group held in Akutan in October 2022 was asked whether their AMHS ferry (*M/V Tustumena*) usage would be impacted in any way (positively or negatively) in a FWP scenario. All respondents indicated that usage of the AMHS ferry is independent of the demand for transportation between Akutan and Akun and would remain unchanged.

#### **6.1.2.3 Fixed-wing Service**

While participation in the EAS subsidy must be renewed every two years, no changes to the EAS service are anticipated under FWP conditions.

#### **6.1.2.4 Maritime Aviation Helicopter**

In all future with-project alternatives, it is assumed that the helicopter service in Akutan would be eliminated and replaced with the marine ferry.

While affordability is a driving factor in the need to look at marine transportation options, there are other potential impacts to consider when investigating the removal of a helicopter from the region in FWP conditions.

During peak fishing seasons, the U.S. Coast Guard often maintains a H-60 or H-65 helicopter in Dutch Harbor or (less often) in Cold Bay for typical Coast Guard functions. However, during the off seasons this helicopter is stationed in Kodiak. It is estimated

that under a best-case scenario travel time from Kodiak to Akutan for an emergency medical evacuation (medivac) would require six hours. In these situations, the primary transportation to medical services would also shift from the helicopter (FWOP) to the marine ferry (FWP). Transportation times on the ferry are longer than the helicopter, however the ultimate impact of this increased travel time between Akutan and Akun is offset by the travel time required by the fixed-wing. It is anticipated that for medical purposes the overall impact of a shift from helicopter to marine ferry would be minimal.

Off-season search and rescue (SAR) support operations, however, could experience negative impacts as a result of there no longer being a helicopter stationed in the region that could provide immediate assistance. In FWP, SAR operations would default to the Coast Guard with travel times varying depending upon where the nearest available helicopter is stationed and weather conditions along the route.

#### **6.1.2.5 Trident Seafoods Transportation Methods**

Trident Seafoods in Akutan processes many species, but the primary species by volume and value is pollock from the Bering Sea. The Bering Sea pollock fishery is the largest sustainably certified fishery in the world. It is well managed and has never been closed to fishing. The annual catch limit varies based on abundance but is very stable at approximately 1,000,000 metric tons (~2.2 billion pounds) of harvest per year. A significant decline in the short- or long-term is not anticipated.

Due to uncertainty in the future operations of the Trident Seafoods Akutan processing plant, this project is not formulated to incorporate benefits associated with transportation of plant employees.

#### **6.1.2.6 Marine Transportation (Skiff Operations)**

In future with project conditions, it is assumed that the residents of Akutan will continue to choose to utilize their personal vessels to access Akun Island at a similar rate when compared to historical and existing conditions, as described in 3.4.1.6.

### **6.1.3 Fuel and Freight**

In FWP conditions, there is the possibility to transfer fuel more cost effectively from Akutan to Akun to support airport operations. In FWP, it is anticipated that fuel would continue to be delivered to Akutan via barge (as occurs in FWOP conditions) with fuel barrels transferred via the marine ferry rather than the helicopter. As a result of this shift, cost savings in fuel delivery fees could potentially be expected. Fuel volumes transferred to Akun for the airport generators and snow removal equipment is minimal, and any cost savings benefits would be equally captured by all FWP alternatives and therefore is not likely to impact plan selection or significantly alter NED benefit levels.

It is not anticipated that an aircraft refueling system would be installed on Akun in FWP conditions, as interviews with aircraft operators indicated that a fuel system on Akun would be very costly to install and maintain and would require testing to maintain aircraft fuel quality.

#### **6.1.4 Other Social Effects (OSE)**

While it can be difficult to quantify a direct link between a navigation project and improvements to the viability of a community, understanding the unique nature of remote Alaska and how transportation improvements could strengthen the resiliency of the village is critical. For example, navigation efficiency has the potential to reduce transportation cost for fuel and goods. According to the American Society for Civil Engineers Infrastructure Report Card for Alaska, “without safe and efficient access to ports and the ocean, the main regional economic driver in many of our communities is gone” (ASCE 2017).

Having affordable and dependable transportation to and from the community will allow both emergency and scheduled medical transport to occur, reducing both risks to life safety and economic costs to community members who could otherwise be impacted while attempting to access medical services in hub communities such as Anchorage and Seattle. Having reliable access to medications and medical supplies could avoid occurrences of some medical emergencies entirely.

However, there are health and safety benefits to the region by having a helicopter stationed on Akutan that could be reduced if the helicopter was no longer serving the community. According to Maritime Aviation, they are frequently involved in medivac transportation (a typical scenario would involve flying a patient from Akutan to Akun where the patient is transferred to a fixed-wing ambulance.) The Coast Guard has also conducted medivacs directly from Akutan using an H-60 or H-65 helicopter. During peak commercial fishing season, the Coast Guard may station a helicopter at Unalaska or Cold Bay (35 and 140 miles away) but most frequently the nearest helicopter is stationed on Kodiak Island (575 miles away – which typically takes about 6 hours by flight). In addition, having a helicopter stationed on Akutan provides an opportunity for medivac and SAR assistance to neighboring islands. Recently the helicopter was utilized to assist with a SAR operation on Unalaska following a tragic car accident. In a FWP scenario, the helicopter would likely be removed from Akutan and life safety transportation improvements provided by the ferry could potentially be somewhat offset by increased risks to the region associated with increases in response transportation times by the Coast Guard. However, (while not directly reflected in this analysis or the FWOP conditions assumptions) if funding for the helicopter were not sustained through the study period of analysis, not only would the helicopter be removed from the region, but there would be no effective transportation option that would help fill the gaps which would leave an even more severe situation than faced in FWOP.

A summary of the OSE criteria FWOP condition, the FWP effect and the relevance to long term community viability, along with specific Section 2006 considerations are outlined in Appendix C: Economics.

## 6.2 Alternative Plan Costs

The USACE Alaska District cost engineers developed Rough Order of Magnitude (ROM) cost estimates for the alternatives, including those to construct and maintain facilities. The Cost Engineering Appendix (Appendix D) details the procedures and assumptions used to calculate the estimates. Cost risk contingencies were included to account for uncertain items such as dredged material disposal or storage methods.

PED costs are based on a percentage of the estimated construction costs. Estimates will be refined as more data is collected, but these data were not available when during the initial analyses. These data will be included in subsequent revisions leading to the final Feasibility Report.

Project costs were developed without escalation and are in 2023 dollars. The ROM costs for each alternative are displayed in Table 18.

Table 18. Alternative Plan Costs

<b>Cost Description</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>
Mobilization and Demobilization	\$1,927,838	\$3,701,876	\$3,701,876
Dredging (Drill/Blast/Dredge)	\$786,000	\$7,908,400	\$5,441,300
Breakwater	\$41,501,072	\$15,763,920	\$21,124,025
LSF Uplands	\$5,961,440	\$4,793,130	\$3,383,852
Archaeological Monitoring & Mitigation	\$566,340	\$566,340	\$391,684
Akutan Side: Dock	\$1,000,000	\$1,000,000	\$1,000,000
S&A (7.5%)	\$3,880,702	\$2,530,025	\$2,628,205
PED (5.0%)	\$2,587,135	\$1,686,683	\$1,752,137
Contingency (50%)	\$29,105,263	\$18,975,187	\$19,711,540
<b>Total</b>	<b>\$87,315,789</b>	<b>\$56,925,561</b>	<b>\$59,134,619</b>

PED is expected to occur over a 30-month period. Construction is expected to occur over 3 years consisting of 3 construction seasons, each 6 months in duration, with construction complete by the end of calendar year 2032. These assumptions inform the interest during construction calculations.

Maintenance dredging and armor rock replacements of varying degrees are assumed for each alternative. H&H developed the maintenance intervals and quantities for maintenance dredging and rock replacement. Cost Engineering developed the

Operations, Maintenance, Repair, Rehabilitation, and Replacement (OMRR&R) costs. Maintenance dredging consists of three components: mobilization and demobilization, dredge survey, and dredging, and vary by alternative. While not a maintenance feature, the AEB would continue to be responsible for the contract for transportation between the Akutan Harbor on Akun Island and the community of Akutan until 2032.

As with benefit cash flows, costs are discounted/indexed to a base year and amortized to compare the average annual benefits. As such, the project first costs detailed in the Cost Engineering Appendix differ slightly from those used in the benefit-cost analysis. Costs used in the benefit-cost analysis include the project's initial cost compounded to the base year using the current discount rate, interest during construction (IDC), and estimated operations and maintenance costs. The costs for the benefit-cost analysis are referred to as NED or economic costs. The economic project costs by alternative for the benefit-cost analysis are shown in Table 19.

Table 19. Alternative Cost Estimates (Present Value)

<b>Cost Component</b>	<b>Alt 1</b>	<b>Alt 2</b>	<b>Alt 3</b>
Project First Cost	\$ 87,316,000	\$ 56,926,000	\$ 59,135,000
Interest During Construction	\$ 3,011,000	\$ 1,963,000	\$ 2,039,000
OMRR&R	\$ 4,487,000	\$ 3,478,000	\$ 4,130,000
<b>Total Economic Cost</b>	<b>\$ 94,814,000</b>	<b>\$ 62,366,000</b>	<b>\$ 65,304,000</b>
<b>Average Annual Economic Cost</b>	<b>\$ 3,343,000</b>	<b>\$ 2,199,000</b>	<b>\$ 2,302,000</b>

Each alternative was evaluated to determine how well it met the project objectives of provide sustainable, safe, reliable access to Akutan and to improve key service operations such as mail and medical supplies between Akun Island and the community of Akutan. The alternatives also met the four P&G evaluation criteria outlined in Section 2.7 and evaluated in Section 5.6. Current laws, regulations, policy, and guidance were incorporated into the development of the alternatives to ensure acceptability, completeness, effectiveness, and efficiency.

### **6.3 Project Benefits**

Each alternative provides a certain amount of relief from existing and expected future inefficiencies. From a NED perspective, the differences between the FWOP conditions and those that will occur under the various With Project Conditions are benefits that accrue to the project and together with cost data inform the identification of the Tentatively Selected Plan (TSP). As mentioned at the outset, the Remote and Subsistence Harbors Authority allows for plan justification under a non-NED Framework: Other Social Effects (OSE).

#### **6.3.1.1 Transportation Cost Savings**

Transportation cost savings are computed as the difference between annual contract costs for the helicopter (FWOP) and the annual estimated contract costs for the marine ferry (as described in Section 6.1.2.1.3). Contract costs are used as a proxy for transportation cost savings in this analysis but may include supplementary charges for items such as return on investment or capital recovery that are beyond the direct cost incurred for transportation services. The impact of those costs on this analysis are not significant, as they would be similarly reflected in both the helicopter and ferry contracts and would be minimized or eliminated when the differences between the two estimates are calculated for benefit purposes.

It is further assumed that the contract costs utilized are reasonable. The amounts in FWOP are reflective of what is spent on those transportation services for the helicopter, the ferry contract amounts in FWP are an estimate calculated by the MDC and supported by readily available daily contract rates of similar vessels and includes a range of costs to allow for some uncertainty. Given that the transportation in Akutan is heavily subsidized, it is a reasonable assumption that the DOT would not support the subsidy rate if it included unreasonable fees or price gouging due to low competition rates.

**6.3.1.0 Total Project NED Benefits**

Total project NED benefits are presented in Table 20 and include a range of values to reflect uncertainty.

Table 20. NED Benefits by Alternative (Present Value)

Description	Alt 1		Alt 2		Alt 3	
	Low	High	Low	High	Low	High
Present Value Benefits	\$11,260,000	\$26,887,000	\$11,260,000	\$26,887,000	\$11,259,838	\$26,887,000
Average Annual Benefits	\$397,000	\$948,000	\$397,000	\$948,000	\$397,000	\$948,000

**6.4 Four Accounts**

The USACE planning guidance establishes four accounts to facilitate and display the effects of alternative plans. The following four accounts facilitate the evaluation and presentation of the effects of alternative plans. The first is the NED account, which displays changes in the economic value of the national output of goods and services. Next, the Regional Economic Development (RED) account displays changes in the economic value of the regional output of goods and services. The third account is Environmental Quality (EQ), which displays non-monetary effects on ecological and aesthetic resources, including the positive and adverse effects of plans. The last account is the OSE account, which displays plan effects on social aspects such as

community impacts, health, and safety, displacement, and energy conservation. A full discussion of the four accounts can be found in Appendix C: Economics.

### 6.4.1 National Economic Development (NED) Analysis

#### 6.4.1.1 Net Benefits and Benefit-Cost Ratios (BCRs)

Net benefits and the BCR are determined using the average annual benefits and average annual costs for each alternative (Table 21). Net benefits are determined by subtracting the average annual costs from the average annual benefits for each alternative; the BCR is determined by dividing average annual benefits by average annual costs.

Table 21. NED Net Benefits and BCR's by Alternative

Description	Alt 1		Alt 2		Alt 3	
	Low	High	Low	High	Low	High
AAEQ Benefits	\$397,000	\$948,000	\$397,000	\$948,000	\$397,000	\$948,000
AAEQ Costs	\$3,343,000	\$3,343,000	\$2,199,000	\$2,199,000	\$2,302,000	\$2,302,000
Net AAEQ Benefits	\$(2,946,000)	\$(2,395,000)	\$(1,802,000)	\$(1,251,000)	\$(1,905,000)	\$(1,354,000)
BCR	0.12	0.28	0.18	0.43	0.17	0.41
Most Likely (Average) BCR	0.20		0.31		0.29	

The alternative that reasonably maximizes net benefits would typically be the recommended alternative under the NED account, particularly when the BCR is greater than 1.0 (when benefits exceed costs). In this case, no alternative has benefits exceeding costs. However, Alternative 2 has the highest net NED benefits on both the lower and upper ends of the benefits range.

### 6.4.2 Regional Economic Development (RED)

The economic benefits that accrue to the region, but not necessarily the nation, include developing consistent, reliable, and affordable transportation to the community of Akutan. Without affordable access in and out of the community, the long-term viability of the community is threatened, and potential local and regional economic opportunities may not be realized.

Functioning infrastructure may also result in transfers of economic activity from other regions to the region where the proposed project is located due to the project efficiencies. These represent regional economic gains to the project region but may cause losses to other regions (shifting of the economic activity from one region to another). The area of regional impacts will vary depending upon the type and scope of the project, and due to the unique nature of the transportation network and the project

formulation, no significant regional transfers of economic activity are anticipated for Akutan.

### **6.4.3 Environmental Quality (EQ)**

For each alternative plan, positive and negative benefits to the environment must be analyzed consistent with current guidance. The benefit assessment can be quantitative or qualitative and, if appropriate, monetized. The analysis must distinguish between national and regional benefits while ensuring benefits are not accounted for more than once.

The FWOP condition would result in continued air travel between the Akutan Airport on Akun Island and Akutan Island by helicopter. The extent to which marine mammals and birds are affected by this are unknown, but some level of disturbance when the helicopter is low during takeoff and landing is possible.

Environmental effects, both positive and negative, are similar among all three FWP alternatives. All alternatives would place fill over existing benthic habitat and dredge adjacent benthic habitat. The area inside the breakwaters would be converted to a lower energy environment, but the areas are small overall when compared to overall costal habitat on Akun Island. Confined underwater blasting would be required for alternatives 2 and 3 which would lead to greater impacts to fishes and marine mammals, although the impacts are of short duration and would be mitigated to the extent possible by timing windows and shutdown distances. All three alternatives would introduce additional vessel traffic between Akutan and Akun and this would increase underwater noise and the risk of vessel strikes to marine mammals. These potential impacts could be mitigated by observing for marine mammals and altering course and speed as required to avoid vessel strikes. All three alternatives would eliminate helicopter flights and remove this source of potential disturbance. All three alternatives would impact a known historic property (the Surf Bay Archaeological District).

### **6.4.4 Other Social Effects**

#### **6.4.4.1 Cost Effectiveness/Incremental Cost Analysis**

Section 6.3.1 presented the NED analysis and demonstrated that there is no NED Plan. In accordance with the Section 2006 Authority, the CE/ICA is conducted to evaluate the effects of the proposed alternatives beyond the NED perspective. These effects are non-monetary outputs. The CE/ICA is utilized to inform decisions on sound investments by identifying options that yield maximum desired outputs for the least acceptable cost. The selected outputs are measured in Access Capability for the marine ferry as served by navigation improvements. This section first describes the development of the CE/ICA variables, the underlying assumptions, and Hydraulics and Hydrology (H&H) modeling



that form the basis of the outputs or metric. It then discusses the computations and CE/ICA results completed utilizing the IWR Planning Suite II tool.

#### *6.4.4.1.1. CE/ICA Framework*

The project objectives are to provide sustainable, safe, reliable access to Akutan by improving key service operations such as the transportation of passengers, goods, mail, and medical supplies between the Akutan Airport on Akun Island and the community of Akutan over the 50-year period of analysis. The basis of the outputs used in this CE/ICA is rooted in those planning objectives.

Access Capability directly impacts waterborne transportation for Akutan, particularly given the integral significance that the ability to access their airport is to the long-term viability of the community. This metric was chosen rather than Access Days due to the varying factors such as transportation of people, freight, and mail; the complexity involved in coordinating fixed-wing flights between Unalaska and Akun with transportation between Akun and Akutan (via FWOP helicopter or FWP ferry), along with additional considerations such as safety (including delivery of essential medications and medivacs) and subsistence (ability to access current resources and benefits associated with FWP alternative sites). A metric encompassing all factors was critical in order for the OSE analysis to reflect the complexity of FWOP and FWP conditions. Therefore, the optimal metric for the CE/ICA is Access Capability. The CE/ICA metric compares the accessibility between the proposed alternative plans and the No Action plan.

The OSE analysis operates similarly to the analysis undertaken to choose a National Ecosystem Restoration plan. ER 1105-2-100 states:

Selecting the National Ecosystem Restoration (NER) plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of cost effectiveness and incremental cost analyses, significance of outputs, acceptability, completeness, efficiency, and effectiveness.

OSE analysis using the CE/ICA tools to determine the TSP comply with the above guidelines.

The Alaska District H&H collaborated with Economics, Planning, and Project Management on the development of the model metric and model input.

#### *6.4.4.1.1. Variable Descriptions*

The CE/ICA in this analysis considers two variables, non-monetary outputs and cost. The non-monetary outputs are measured in Access Capability. The terms output and metric are interchangeable in this report.

Access Capability is defined as percentage of time that the design vessel (marine ferry) can safely access and moor at the proposed navigation improvements. Access Capability is the non-monetary metric used in this CE/ICA. Safe access represents the percentage of time that the wave and water level conditions meet the safety requirements for the design vessel for each alternative.

Safe access is based on wave and water level conditions at the proposed alternatives and is controlled by the safe operating conditions for the design vessel. The H&H Appendix (Appendix A) details the methodology used to determine the wave and water level conditions. Hindcast wind and wave data was used to estimate the percent of time that the wave conditions at the sites and the entrance of the proposed navigation improvements would have exceeded the safe operating conditions of the design vessel. Transportation to and from the airport occurs year-round for Akutan, and marine accessibility for the airport is similarly evaluated annually.

For purposes of this analysis, the baseline FWOP Access Capability (estimated at 0.70 for the helicopter, see Appendix C: Economics Section for more information) is subtracted from the FWP Ferry Access Capability at each alternative. See Table 22 for additional information.

Table 22. Access Capability Metric

<b>Alternative</b>	<b>Total Access Capability</b>	<b>Access Capability above FWOP</b>
Alternative 1	0.78	0.08
Alternative 2	0.78	0.08
Alternative 3	0.71	0.01

The cost-effectiveness analysis evaluates a plan’s level of outputs against its cost. The subsequent incremental cost analysis evaluates a variety of alternatives of different scales to arrive at a “Best Buy” option. Best Buy plans are considered the most efficient plan which provides the greatest increase in output for the least increase in cost. These analyses help to inform whether or not the next unit of benefit is “worth it”. The costs variable for a CE/ICA refer to the average annual economic costs (AAEQ) of each alternative. These costs include project first costs, interest during construction, and operation and maintenance costs. The costs are amortized using the federal discount rate for FY23 over the period of analysis. The annual average costs used in the CE/ICA is summarized in Table 23.

Table 23. Average Annual Costs for CE/ICA by Alternative

<b>Cost Component</b>	<b>Alt 1</b>	<b>Alt 2</b>	<b>Alt 3</b>
Project First Cost	\$ 87,316,000	\$ 56,926,000	\$ 59,135,000
Interest During Construction	\$ 3,011,000	\$ 1,963,000	\$ 2,039,000
Operations and Maintenance	\$ 4,487,000	\$ 3,478,000	\$ 4,130,000
<b>Total Economic Cost</b>	<b>\$ 94,814,000</b>	<b>\$ 62,366,000</b>	<b>\$ 65,304,000</b>
<b>Average Annual Economic Cost</b>	<b>\$3,343,000</b>	<b>\$2,199,000</b>	<b>\$2,302,000</b>

6.4.4.1.1. CE/ICA Calculations and Results

The CE/ICA consists of four steps. The first is to estimate the average annual benefits of each alternative. These average annual benefits are the non-monetary units measured through the access capability metric. The second step is to estimate the average annual equivalent costs of the alternative plans. The first two steps are completed in the previous subsections. The third and fourth steps use the IWR Planning Suite II software to identify cost-effective plans and estimate incremental cost outputs, respectively.

6.4.4.1.1. Cost Effectiveness

The cost-effective analysis results showed Alternative 2 is cost-effective. The incremental cost analysis yielded that the No Action (FWOP) and Alternative 2 are the only Best Buy (most efficient) plans. A summary of the CE/ICA variables and the cost-effectiveness analysis results are shown in Table 24.

Table 24. CE/ICA Results Summary

<b>Alternative</b>	<b>Access Capability</b>	<b>Average Annual NED Cost (\$1000)</b>	<b>Average Annual Cost per Unit of Access Capability (\$1000/Access Capability)</b>	<b>Cost-Effective</b>
No Action (FWOP)	0.00	\$ 0	\$ 0	Best Buy
Alt 1	0.08	\$ 3,343	\$ 41,787.50	Non-Cost Effective
Alt 2	0.08	\$ 2,199	\$ 27,487.50	Best Buy
Alt 3	0.01	\$ 2,302	\$ 230,200.00	Non-Cost Effective

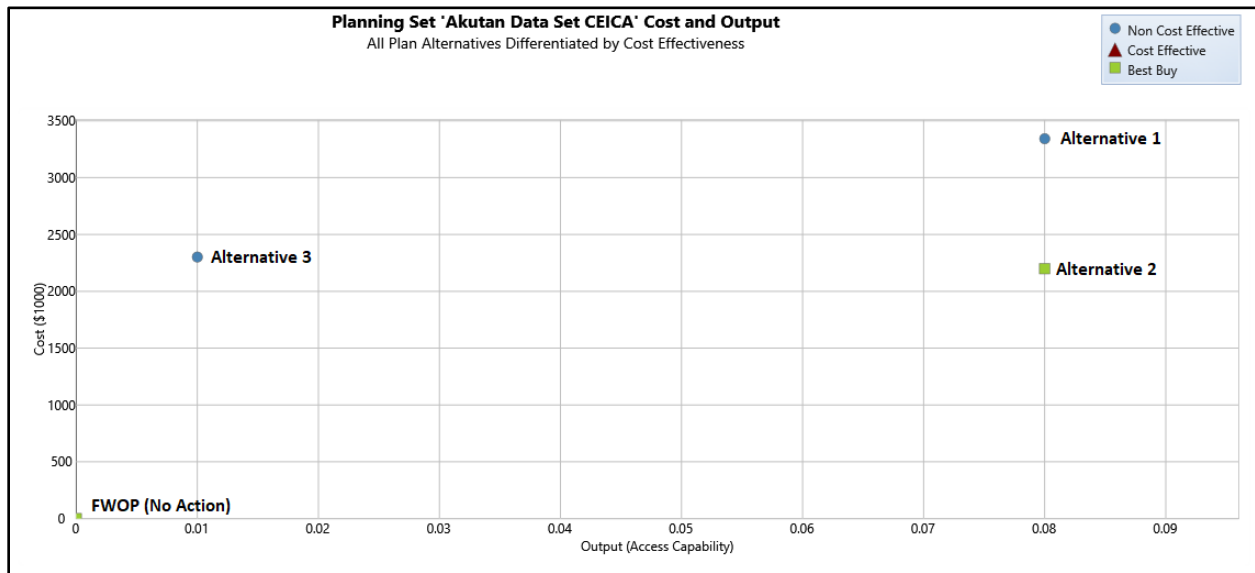


Figure 38: Alternatives Differentiated by Cost-Effectiveness

Figure 38 illustrates the CE/ICA concept well. Cost effectiveness analysis is conducted to ensure that the least cost plan alternative is identified for each possible level of environmental output; and that for any level of investment, the maximum level of output is identified. In Figure 28, it can be seen that when comparing Alternative 1 and Alternative 2, both provide the same level of Access Capability but Alternative 2 does so at a lesser cost. When comparing Alternative 2 and Alternative 3, it can be seen that Alternative 2 outperforms Alternative 3 both by having a lesser cost and by having a higher level of Access Capability. The No Action (FWOP) is always considered cost effective since it also meets the criteria of being the least cost (\$0) plan for the given level of output (which is also zero). As no other alternative provides greater benefits at a lesser cost, Alternative 2 and No Action (FWOP) are the two Cost Effective and Best Buy plans.

*6.4.4.1.1. Incremental Cost Analysis*

The Incremental Cost Analysis is performed by determining the incremental cost per unit between successively larger Best Buy plan alternatives, which helps answer the question of whether the next unit of benefit is “worth it”. The Cost-Effective Analysis identifies the No Action (FWOP) and Alternative 2 as the two Best Buy plans to be compared by the incremental cost analysis. The Incremental Cost Box Graph in Figure 39 displays the Best Buy plan comparisons resulting from the incremental cost analysis and the incremental cost per unit for Access Capability provided by Alternative 2, as there is no incremental cost or output for No Action.

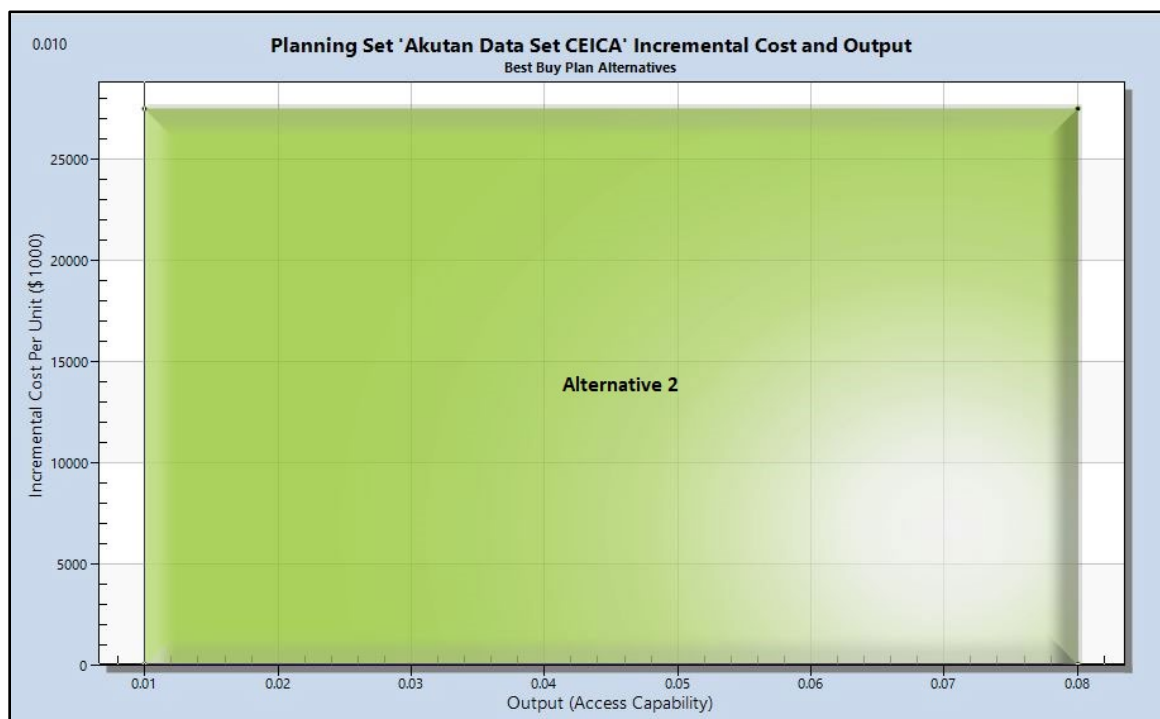


Figure 39: Incremental Cost Analysis of Best Buy Plans

The gain in access capability (i.e., non-monetary outputs) relative to the increase in cost for each alternative is shown in Table 25.

Table 25. Best Buy Plan Incremental Cost Analysis

Alternative	Access Capability (Output)	Incremental Cost (\$1000)	Incremental Output	Incremental Cost per Output
No Action (FWOP)	0.00	0	0.00	\$ 0
Alt 1	0.08	1,041	0.07	\$ 14,841.43
Alt 2	0.08	-1,144	0.00	\$ 0
Alt 3	0.01	2,302	0.01	\$ 230,200.00

#### 6.4.4.2 Multi-Criteria Decision Analysis (MCDA)

While Access Capability is the optimal metric representing the opportunity for safe access at each alternative plan, the metric alone inadvertently assumes all alternatives provide a uniform level of benefits for that access. By this assumption, the nuances of benefits and their contribution to community viability are not fully captured within that metric. In these cases, MCDA can be used to account for these OSE benefit intricacies. The specific OSE metrics which impact community viability are described in detail and qualitatively discussed in Section 6.1.4, Section 6.6, and Section 7.3.4.

Multicriteria decision analysis has great value for providing a method and structure for informed discussions of the relevant conflicts and values between potential alternatives. MCDA is a decision aiding tool and allows for clarification and conveyance of tradeoffs across alternatives (CDM Smith, 2017). It can serve to demonstrate that the final decision is informed through a rational process fully cognizant of stakeholders' criteria (Trade-Off Analysis Planning and Procedures Guidebook, IWR 02-R-2), and it is important to understand that MDCA is a decision-making aid, not a decision in itself. The selection of criteria for the MCDA is based on key benefits that support community viability and meet the planning objectives. These criteria were formulated throughout the study process and then vetted and revised during a community focus group consisting of key stakeholders. Participants at the focus group were selected from a wide-ranging pool of village residents with the aim to have representation from all elements of the community (i.e., skiff owners, retired and current commercial fishermen, elected government officials and representatives, tribal members, and Village/Regional corporation members. In all, a total of nine key community members were invited to the focus group and every invited individual attended. Table 26 presents the OSE criteria selected for the MCDA.

Table 26. MCDA OSE Criteria

Criteria 1	Health and Safety
Criteria 2	Subsistence
Criteria 3	Delivery of Essential Non-Medical Goods
Criteria 4	Cultural Identity (non-food gathering cultural practices)
Criteria 5	Income Opportunities
Criteria 6	Community Growth/Expansion
Criteria 7	Transportation Mode Preferences
Criteria 8	Noise Pollution
Criteria 9	Local Vessel Access

#### 6.4.4.2.1 Assigned Quantitative Values

The MCDA follows the methodology set out in the IWR Planning Suite II User Guide (CDM Smith, 2017). Weighted Scoring is utilized as the ranking method for this analysis as it is simple, intuitive, and the most commonly used method. Under weighted scoring, qualitative criteria such as those presented in the preceding Table 26 are each assigned a quantitative score (by alternative) and weight (by criteria). Each criterion represents a measured quantity in the MCDA decision matrix.

MCDA involves optimizing criteria, whereby the minimization of undesirable effects and maximization of desirable effects are considered. Since the selected criteria represents a benefit that supports community viability, a maximization of each criterion is considered favorable.

It is acknowledged that assigning values to criteria has some limitations, for example a *Medium* ranking is almost twice that for the Low ranking. However, for the level of analysis for the MCDA, it was determined that ranking values by the focus group was appropriate.

Alternative sites were utilized for the MCDA scoring rather than alternatives in this case. This was done for two reasons. First, it was determined that sites would be the primary driver for differences between scores of alternatives. Second, scoring the potential alternative sites rather than specific alternatives enables the outputs from the focus group to remain valid even if alternative designs are subsequently optimized. Each focus group participant conducted scoring of each criterion from 1 to 10 (with 1 being the lowest, and 10 being the highest) based on the individual’s best knowledge of the conditions and how well the proposed site would meet the planning objectives. The criteria rankings clarify the incremental benefits of Access Capability across alternatives. Additional information on criteria scores is included in Table 27.

Table 27. MCDA Criteria Scores

Criteria #	Description	Total Score by Criteria			
		FWOP	Alternative 1	Alternative 2	Alternative 3
Criteria 1	Health and Safety	78	89	89	26
Criteria 2	Subsistence	49	70	70	28
Criteria 3	Delivery of Essential Non-Medical Goods	70	89	89	38
Criteria 4	Cultural Identity (non-food gathering cultural practices)	49	77	77	31
Criteria 5	Income Opportunities	47	82	82	26
Criteria 6	Community Growth/Expansion	45	79	79	32
Criteria 7	Transportation Mode Preferences	62	87	87	28
Criteria 8	Noise Pollution	20	44	44	27
Criteria 9	Local Vessel Access	38	73	73	41

Not all criteria are equally important to the decision. With criteria defined and scored, each was then individually weighted (from low to high) based on the focus group participants best knowledge of the conditions and how important each criterion is to community viability.

Following the focus group, the criteria were then transformed numerically using the following: low equal to a weight of 1, medium-low equal to 2, medium equal to 3,

medium-high equal to 4, and high equal to 5. These numerical weights were then summed and averaged to determine a weight for each criterion. Additional information on criteria weights is included in Table 28.

Table 28. MCDA Criteria Weights

Criteria #	Description	Criteria Weight (1 = low, 5 = high)	Criteria Rank (by Importance)
Criteria 1	Health and Safety	5.00	1
Criteria 2	Subsistence	4.78	2
Criteria 3	Delivery of Essential Non-Medical Goods	4.00	4
Criteria 4	Cultural Identity (non-food gathering cultural practices)	4.00	4
Criteria 5	Income Opportunities	3.78	6
Criteria 6	Community Growth/Expansion	3.44	8
Criteria 7	Transportation Mode Preferences	3.78	6
Criteria 8	Noise Pollution	1.78	9
Criteria 9	Local Vessel Access	4.22	3

#### 6.4.4.2.2 MCDA Ranking Results

For purposes of the MCDA, the score for criteria was calculated as the change from FWOP to FWP for alternative. The two criteria that were previously utilized in the CE/ICA (Access Capability and AAEC Cost) are also included for the MCDA.

The MCDA aims to support and unpack the complexities within the single metric of access capability. Weights and scores were analyzed within the MCDA module of the IWR Planning Suite II software utilizing weighting scoring by range (as recommended within the IWR Planning Suite users guide). Utilizing this technique, for this portion of the analysis the tool assigns the poorest performance of each criterion a value of zero. Given the desire to minimize cost, for this analysis the poorest performance for the cost criteria is the highest cost plan (Alternative 1) and it is therefore assigned a zero value. Given the desire to maximize all other criteria, for this analysis the poorest performance (lowest scores) across all other criteria is Alternative 3 and therefore they are given zero values. Figure 40 shows the MCDA criteria outputs by Alternative, and the subsequent alternative rankings.



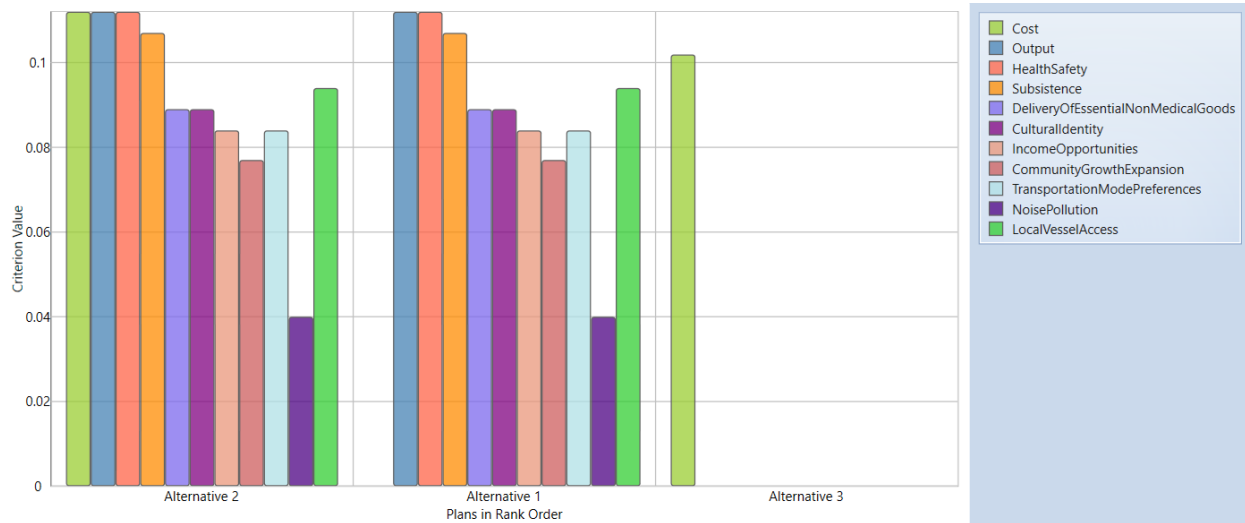


Figure 40. MDCA Criterion Weighted Scoring by Range Outputs by Alternative.

Alternative 2 scores highest in the MCDA analysis, with Alternative 1 following close behind and Alternative 3 a distant third. The alternative plan scores are normalized by range, with each score varying from 0 to 1. See Figure 41 and Table 29 for additional information.

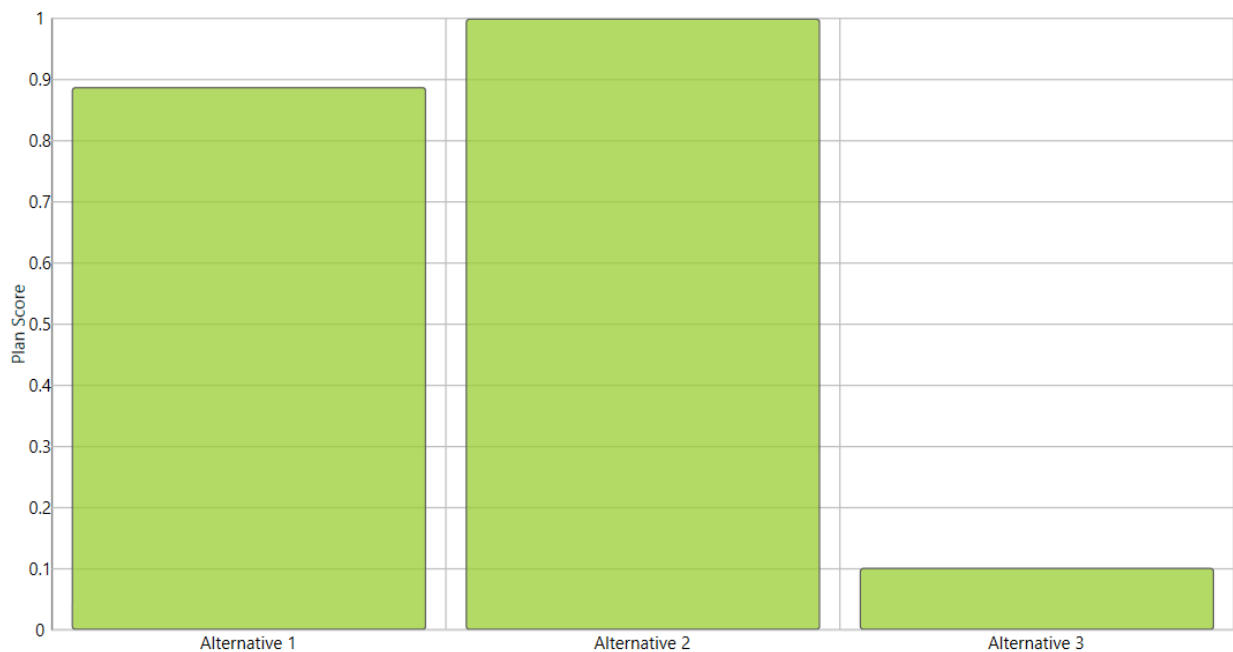


Figure 41. MDCA Plan Outputs by Alternative.

Table 29. MCDA Scored Values by Alternative

Alternative	MCDA Score	MCDA Rank
Alt 1	0.888	2
Alt 2	1.000	1
Alt 3	0.102	3

### 6.5 Four Accounts Evaluation Summary

The alternatives were evaluated using the four accounts established in the Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies: National Economic Development (NED), Regional Economic Development (RED), Environmental Quality (EQ), and Other Social Effects (OSE).

Consistent with Section 2006 of WRDA 2007 – Remote and Subsistence Harbors, as amended, a NED analysis was performed, which demonstrated that none of the alternatives had a benefit-cost ratio (BCR) greater than 1.0. Since there was no NED plan, CE/ICA was used to inform plan selection. Additionally, the Multiple Criteria Decision Analysis (MCDA) tool was used to aid in capturing the incremental value of the CE/ICA metric of Access Capability. Economic risks and uncertainties were identified and discussed to support risk-informed planning and decision-making under uncertainty.

Alternative 2 had the highest average annual net NED benefits, however the BCR is below 1.0. The No Action and Alternatives 2 were identified as Best Buy plans through the CE/ICA, meaning Alternative 2 provides the greatest increase in output for the least increase in cost. The results of the MCDA similarly pointed to Alternative 2 as the best option. The CE/ICA with the MCDA for OSE benefits demonstrate how the proposed alternatives support Akutan's long-term viability. For additional information see Table 30.

Table 30. Four Accounts Evaluation Summary.

Alternative	Benefit-Cost Ratio	AAEQ Net NED Benefits	EQ	RED	OSE (CE/ICA results, MCDA Rank)	
					Best Buy	Rank
No Action (FWOP)	0.00	\$ 0	Neutral	Neutral	Best Buy	NA
Alt 1	0.12 to 0.28	\$(2,946,000) - \$(2,395,000)	Neutral	Increased employment and income for the region and state	Non-Cost Effective	2
Alt 2	0.18 to 0.43	\$(1,802,000) - \$(1,251,000)	Neutral	Increased employment and income for the region and state	Best Buy	1
Alt 3	0.17 to 0.41	\$(1,905,000) - \$(1,354,000)	Neutral	Increased employment and income for the region and state	Non-Cost Effective	3

### 6.6 Comprehensive Documentation of Benefits Policy Directive Requirements

Consistent with the 5 January 2021 Policy Directive on Comprehensive Documentation of Benefits in Decision Document, each study must include, at a minimum, the following plans in the final array of alternatives for evaluation:

1. The “No Action” alternative.
2. A plan that maximizes net total benefits across all benefit categories.
3. A plan that maximizes net benefits consistent with the study purpose.
4. For flood-risk management studies, a nonstructural plan, which includes modified floodplain management practices, elevation, relocation, buyout/acquisition, dry flood proofing and wet flood proofing.
5. A locally preferred plan, if requested by a non-federal partner, if not one of the aforementioned plans.

For Akutan, a “No Action” alternative is included so the first requirement is met. Additionally, the same plan (Alternative 2) meets the criteria for both item two and item three in the guidance. The fourth and fifth criteria do not currently apply as this is not a flood-risk management study and the sponsor has expressed support for Alternative 2.

## 7.0 TENTATIVELY SELECTED PLAN

### 7.1 Description of the TSP

The Tentatively Selected Plan, Alternative 2, includes a constructing a harbor below the Akutan Airport in Surf Bay which consists of a rubble-mound breakwater, an entrance channel and turning basin (Figure 42). Also included in the project are a mooring basin and dolphins, pile-supported dock, a small pad for parking and freight loading/unloading, and a road connecting the pad to an area near the Surf Bay Inn.

Plan components are typically categorized into General Navigation Features (GNF) and Local Service Facilities (LSF). The GNF and LSF are important to identify during the study because design and construction costs for GNF are cost shared between the Federal Government and Non-Federal Sponsors, but the LSF are the sole responsibility of the Non-Federal Sponsor for construction, operation and maintenance cost. This topic is discussed in more detail in the Cost Sharing section of this report (Section 7.6). Additionally, both GNF and LSF are assessed for potential environmental impacts.

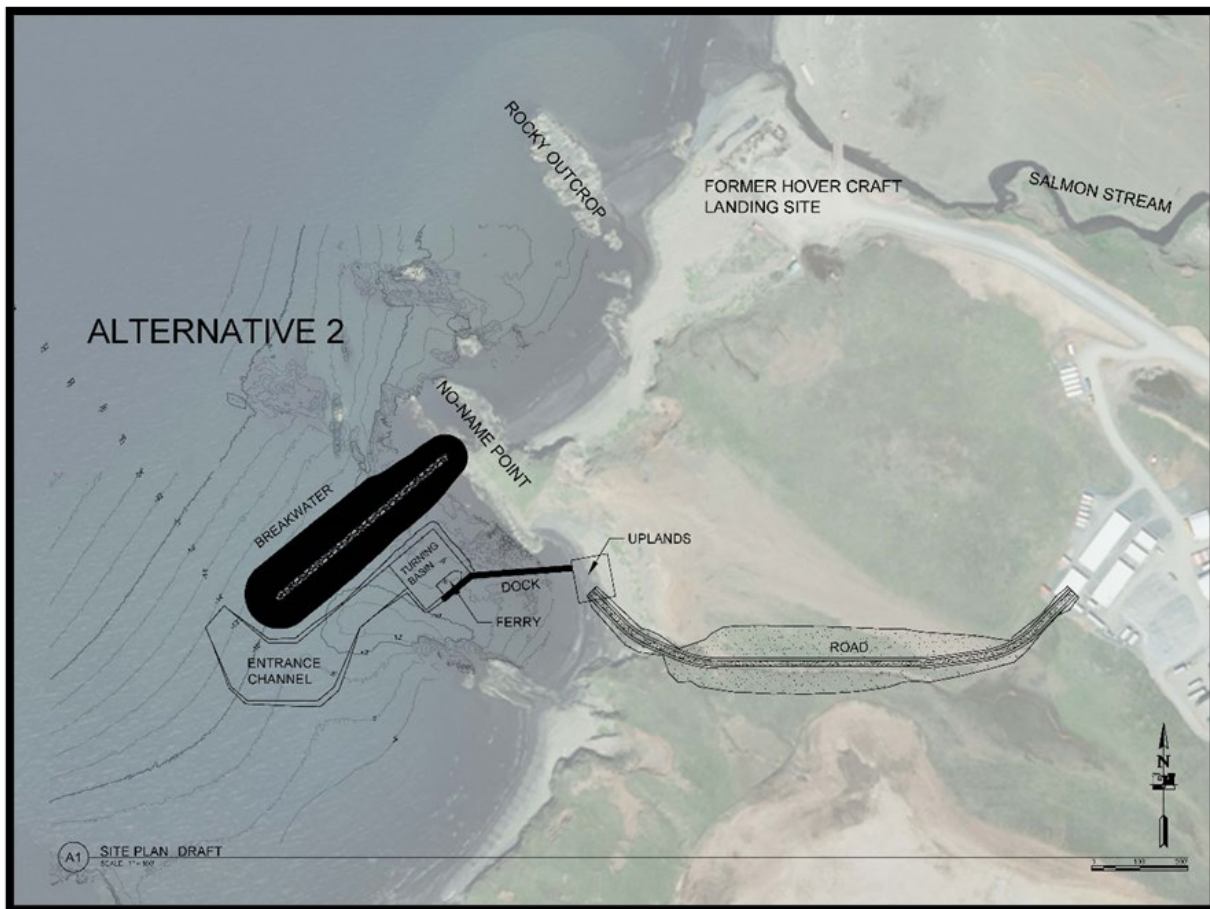


Figure 42. Alternative 2, the Tentatively Selected Plan

### 7.1.1 Plan Components

The GNF in the TSP design (Figure 41) include:

- Breakwater
- Entrance channel dredging/blasting
- Turning basin dredging/blasting

The design vessel used for the project is a 58-foot vessel with 8 feet of draft, described in Section 5.4. The TSP consists of a 120-foot wide by 120-foot-long mooring basin dredged to -13 feet MLLW protected by a 450-foot-long breakwater. Primary armor stone on the breakwater has a median weight of 10 tons. The basin connects to Surf Bay with -13ft MLLW entrance channel that would have a minimum width of 60 feet to a maximum width of 120 feet when turning around the nose of the breakwater. A typical cross-section is show in Figure 43.

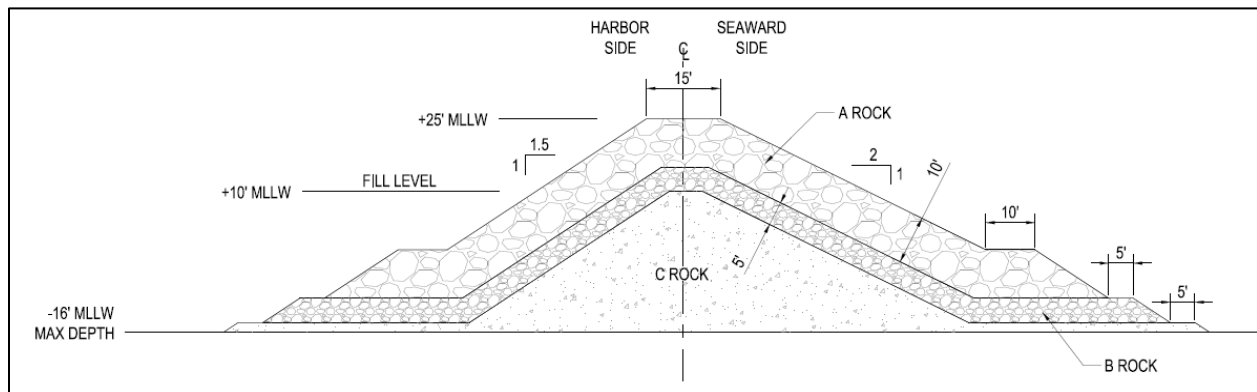


Figure 43. Typical Breakwater Section with Water Level Components.

The Uplands LSF included in the TSP are:

- 0.15 acres for loading/unloading freight from dock
- a 290 foot long by 12-foot-wide pile-supported dock
- 60 foot by 40-foot mooring basin with mooring dolphins
- 1,100 foot long by 12-foot-wide road connecting the harbor areas with the existing pad to the south of the Surf Bay Inn

### 7.1.2 Dredged & Excavated Material Storage Location

A potential upland storage area has been identified on the existing gravel pad where the Surf Bay Inn is located (Figure 44). The Native Village of Akutan has expressed an interest in the dredged and excavated material as it is usable for construction projects and there is a need for it on the island (i.e., proposed roads to Trident Bay and Lost Harbor). It is costly to bring this sort of material in from remote locations and can make construction projects cost-prohibitive.



Figure 44. Potential Upland Storage Location.

### 7.1.3 Construction Considerations

### 7.1.4 Dredging

Typical blasting and dredging operations utilize a barge and dump scow. Given the wave environment, shallow depths and rocky outcrops the TSP area, it is likely that dredging operations would occur from shore or the same temporary fill pads required to construct the breakwater

Initial dredging quantities associated with the TSP are estimated to be 9,840 cy. Alternatives 2 (the TSP) is located within known bedrock prisms and will likely require blasting. Dredging limits were determined based on vessel maneuvering characteristics as a function of length, beam, turning radii, and wind conditions. Side slopes of 2H:1V were assumed based on the rocky material anticipated, and further geotechnical analysis will likely allow for even steeper side slopes.

Mechanical dredging in combination with heavy ripping and/or drilling and blasting will be required to remove material from the proposed entrance channel and mooring basin. Currently, the alternatives have a planned dredge depth of -13 feet MLLW.

Anticipated dredging conditions consist of approximately 5 to 10 feet of loose to medium dense unconsolidated sediment at the surface transitioning into bedrock at varying depths. Based in the information presented in the 2003 Geophysical Report by WSP Golder, it is anticipated that the depth of bedrock ranges from approximately -5 feet

MLLW along the eastern portion of the proposed entrance channel to -20 feet MLLW along the western portion of the proposed entrance channel. The sediment material can be mechanically dredged by clamshell or long-reach excavator. For estimating purposes, we anticipate dense sediments, weathered bedrock, or bedrock will be encountered within the dredge prism. The type of equipment required to remove dense sediments or weathered bedrock could consist of an excavator-mounted pneumatic or hydraulic rock breaker, rock ripper, or rock ripping bucket. After dense sediment or weathered bedrock is loosened or ripped, it can be mechanically dredged by clamshell or long-reach excavator. Bedrock and hard materials are expected to require drilling and controlled blasting before they can be mechanically dredged.

#### **7.1.5 Operations, Maintenance, Repair, Replacement, and Rehabilitation (OMRR&R)**

The non-Federal operator of the harbor would be responsible for the operation and maintenance of the completed mooring areas and local service facilities portion of the project. The Federal Government would be responsible for the maintenance of the causeway extension and breakwaters (except for docks and other local service facilities) and the entrance channel portions of the project. The Alaska District, USACE, would visit the site periodically to inspect the breakwaters and perform hydrographic surveys at 3- to 5-year intervals for the dredged areas. The hydrographic surveys would be used to verify whether the predicted minimal maintenance dredging was warranted for the entrance channel and maneuvering areas. Maintenance requirements for breakwaters would be determined from the surveys and inspections. Local and Federal dredging requirements, if necessary, would probably be combined, so there would be only a single mobilization and demobilization cost.

The breakwaters were designed to be stable for the 50-year predicted wave conditions and no significant loss of stone from the rubble mound structures is expected over the life of the project. Stone quality is strictly specified in construction contracts to control stone degradation. However, it is anticipated that up to 5 percent of the armor stone could need to be replaced every 25 years. This results in an average of 2,000 cubic yards of Armor Rock required for replacement for the three alternatives at year 25.

Maintenance dredging would be conducted on an estimated 10-year cycle. The entrance channel and maneuvering area would require dredging of approximately 900 cubic yards. A dredged material management plan would be developed for the project in which a long-term disposal option would be identified. For purposes of this study, it is assumed that the entrance channel and maneuvering area material would be disposed of at the uplands site preliminarily identified. Clamshell bucket dredging equipment with a scow barge would likely be used for maintenance dredging. Dredged material is generally unconsolidated and should be easier to remove than construction material, and no blasting would be required for maintenance.

## 7.2 Aids to Navigation

Coordination with the U.S. Coast Guard Aids to Navigation Office would be conducted in PED to ensure that necessary marking of the new entrance channels is considered.

## 7.3 Integration of Environmental Operating Principles

The following environmental operating principles have been integrated into the planning process:

**Foster sustainability as a way of life throughout the organization:** This project would increase access and moorage days, fostering a sustainable subsistence-cash economy utilizing marine resources in the Bering Sea. The future without-project condition sees continued inefficiencies in transit between Akun and Akutan Islands and residents of Akutan continuing to experience reliability concerns with transportation, medical supplies and freight. By constructing the TSP, these negative impacts on the viability of the community of Akutan could be reduced.

**Proactively consider environmental consequences of all USACE activities and act accordingly:** Environmental consequences were considered throughout the planning process, and every effort has been made to avoid, minimize, or mitigate anticipated impacts.

**Create mutually supporting economic and environmentally sustainable solutions:** No NED plan was identified for this project, but the Section 2006 authority affords the PDT the flexibility to use CE/ICA in the absence of a NED plan. The TSP, Alternative 2, is a best buy plan based on the CE/ICA. This project was formulated in a way that makes it lasting, requires limited maintenance and avoids long term environmental impacts wherever possible. The sediments removed from the turning basin and entrance channel would potentially be placed on an existing gravel pad near the Surf Bay Inn near the project area. The Tribe has expressed interest in utilizing materials for beneficial use, i.e., building roads on Akun Island.

**Continue to meet our corporate responsibility and accountability under the law for activities undertaken by USACE, which may impact human and natural environments:** A full environmental assessment (EA) is being conducted as required by the National Environmental Policy Act (NEPA). In addition, a draft Finding of No Significant Impact (FONSI) was prepared. Additionally, a Programmatic Agreement (PA) under the National Historic Preservation Act (NHPA) is anticipated. The principles of avoidance, minimization, and mitigation would be enacted to the extent possible.

**Consider the environment in employing a risk management and systems approach throughout the life cycles of projects and programs:** For this study, extensive coordination has taken place to determine the impacts and subsequent mitigations actions regarding environmental impacts.



**Leverage scientific, economic, and social knowledge to understand the environmental context and effects of USACE actions in a collaborative manner:**

USACE worked closely with the Native Village of Akutan and Aleutians East Borough throughout this study. Coordination with agencies is on-going and may be completed in PED, and per the proposed USACE policy waiver regarding completing MMPA/ESA consultation during the Feasibility study, which is currently under review.

**Employ an open, transparent process that respects the views of individuals and groups interested in USACE activities:**

USACE made every effort to be responsive to stakeholder concerns. Public input has been solicited and used for both environmental and economic analysis purposes. Section 9.1 details USACE outreach to date.

**7.4 Real Estate Considerations**

There are no other existing federal projects that lie fully or partially within the lands, easements, rights-of-way, and relocations (LERR) required for this project.

Per 33 Code of Federal Regulations (CFR) § 329.4, navigable waters of the U.S. are those waters that are subject to the ebb and flow of the tide and/or are presently used, or have been used in the past, or maybe susceptible for use to transport interstate or foreign commerce.

**7.4.1 Project Staging Areas**

The construction of the harbor and dredge placement may require access from the uplands (Table 31). The LERRD cost for these upland features have not been determined.

Table 31. Upland Real Estate Requirements

Tract No	Features	Acres	Landowner	Estate Required	Value
	Upland Dredge Placement	1.43	City of Akutan	Standard Estate #15	TBD
	Laydown Yard	0.69 within the highlighted area	City of Akutan	Standard Estate #15	TBD
	Access Road	0.45	City of Akutan	Standard Estate #11	TBD

**7.4.2 Land Acquisition**

LERR necessary to implement this project are lands owned by the State of Alaska and the City of Akutan (Table 32). The NFS will negotiate to secure and acquire all

necessary real estate interest for uplands. The Government’s dominant right of navigation servitude would be exercised for project tidelands below the MHW line for the general navigation features.

Table 32. LERRD Required for the TSP

Tract No	Features	Acres	Landowner	Estate Required	Value
1	Channel	1.08	State of Alaska	Navigation Servitude	NA
2	Harbor	0.30	State of Alaska	Navigation Servitude	NA
3	Breakwater	1.51	State of Alaska	Navigation Servitude	NA
4	Breakwater	0.07	City of Akutan	Standard Estate #8	TBA
5	Breakwater	0.07	State of Alaska	Navigation Servitude	NA

The NFS for the project will be providing any creditable LERRD, which includes only the LERRD necessary for the GNF.

### 7.5 Risk and Uncertainty

In any planning decision, it is important to take into account the risk and uncertainty that is invariably present. For this study, there are 10 risk and uncertainty categories that were identified and are being evaluated during the planning process. Table 33 summarizes the risk and uncertainty items remaining for this project.

Table 33. Risks and Uncertainties

Risk	Type of Risk	Rating	Actions
Weather delays.	Study & Implementation	M	Cost contingency. One final field trip in study, or for construction related activities.
Identification and approval of dredged material placement site.	Study	L	Continue agency coordination and make determination.
MMPA and ESA concurrence deferred until after feasibility phase/waiver needed.	Implementation	M	Submit waiver; Complete coordination in PED. Will add time and cost to design.

Incidental Harassment Authorization permit.	Implementation	M	Will be sought as part of coordination in PED (waiver). Will add time and cost to design.
Blasting	Implementation	M	Coordinate with Services (IHA), lessons learned from Nome, Dutch & other projects in PED that will utilize blasting in Aleutian & Pribilof Islands, and Western Alaska
Subsurface cultural resources.	Implementation	L	PA; Archaeological monitor.
Budgetability.	Implementation	L	Position project in programs for Tribes or EJ communities, or supplemental funding when available.
AEB & City Fish Tax from Trident impacted if plant moves.	Implementation	L	Monitor Trident status, project would make transportation for community more cost effective (positive).
Impacts of climate change and sea level rise upon project are uncertain.	Operation	L	SLC is considered in design; design elevation refined in PED.
Constructability	Implementation	M	It may be necessary to conduct dredging and blasting from a shore-based pad due to shallow and rocky conditions at the project site.

### **7.5.1 Design Vessel**

While the PDT has made informed decisions regarding selection of a design vessel (described in Section 5.4), ultimately the vessel that would provide ferry services would be determined by which contractors are interested in bidding on a ferry service contract and which vessels they have access to. To help account for this uncertainty, the contract cost that is the foundation of the transportation cost reduction analysis includes a range of potential contract fees as informed by the Marine Design Center ferry analysis.

For additional information on design vessel uncertainty see Appendix A: Hydraulics & Hydrology and Section 5.4 of this report.

### **7.5.2 Project Benefits**

The FWOP and FWP conditions for this study have been formulated based on the permanent resident population of the village of Akutan, rather than incorporating the transient population of Trident, due to significant uncertainty regarding the future of the Trident Seafoods processing plant in Akutan. While the primary mode of transportation of Trident workers in the existing condition is tramper vessels to/from Unalaska Dutch, if Trident were to shift its plant to Unalaska Dutch Harbor, as is currently being explored, transportation demand associated with the plant would similarly be reduced in both FWOP and FWP conditions. If a shift like this were to occur, there is likelihood that the frequency of trips for both the helicopter (FWOP) and marine ferry (FWP) would similarly be reduced and subsequently lessen the estimated cost for an annual contract of each method (see Section 6.1 for more information). The impact of this reduction in trip count would likely be a lessening of NED benefits (as the difference between a FWOP and FWP annual transportation contract cost would be lessened if trip counts and subsequently annual contract rates for each service method were lessened) it is not expected to impact alternative recommendation.

Contract costs for the helicopter (FWOP) and marine ferry (FWP) form the basis for the transportation cost savings benefit and are considered reasonable for this purpose. These contract costs are likely to include return on investment and other cost components not directly tied to the transportation services, however the impact of these costs to the benefit calculation is minimal as they would be included in both the helicopter and marine ferry contract costs and would be minimized or eliminated during the benefit comparison (cancelled out). Additionally, given that the transportation in Akutan is heavily subsidized, it is a reasonable assumption that the DOT would not support the existing subsidy rate if it included unreasonable fees due to things like ROI or price gouging due to low competition rates.

In a scenario where Trident were to shift operations from Akutan to Unalaska Dutch, the fish tax base resulting from plant operations would shift from the Aleutians East Borough to the Aleutians West Borough. A loss of both an economic driver for the community of Akutan, and an income source to the AEB, would make affordable and reliable transportation for the village of Akutan even more critical. Under a FWOP condition scenario where Trident shifted operations out of Akutan, the village would be facing all the previously discussed losses along with an annual contract for helicopter operations that is costly even under the existing conditions. The OSE benefits associated with a marine ferry would become even more impactful to the community in this scenario and support long term community viability to an even greater degree. While this shift in operations is not likely to impact alternative plan selection, it would be likely to lead to an even stronger OSE justification than would be expected if Trident were to maintain operations in the community.

### **7.5.3 Project Depth/Optimization**

Project depth was formulated to accommodate both environmental factors such as tide, RSLC, and set-down as well as ship factors such as squat, response to waves, and safety clearance.

The harbor is designed to be accessible during tides of MLLW 0 feet or greater. The intermediate RSCL scenario of -0.92 feet, rounded to 1 of depth, will be incorporated at construction in order to maintain the project depth at year 50. Set-down, or a lowering of water surface elevation due to wind stresses, was not included as the conditions that would cause set-down would likely preclude the ferry from operating. Vessel squat, or the lowering of vessel draft due moving through shallow water, was calculated to be 1 foot of depth. Vessel response to waves, or the vertical movement of pitch, roll, and heave, was calculated to be 1 foot of depth. USACE guidance recommends 3 feet of net underkeel clearance for hard bottom conditions such as rock. An allowable overdepth of 2 feet is reasonable to accommodate imprecisions of the anticipated dredging method of blasting.

The result is a harbor basin depth of 14 feet (-14 feet MLLW) with a max payline of 16 feet (-16 feet MLLW). See Appendix A: Hydraulics & Hydrology for further information on harbor depth calculations. Note that quantities for all 3 alternatives were calculated based on a previous dredge depth of -13 feet MLLW. Since the update in depth from -13 feet MLLW to -16 feet MLLW affects all three alternatives equally, it was not a factor of the TSP selection.

Depth can be optimized throughout the study process, but the impact of this uncertainty would be expected to be similarly borne by the full suite of alternatives and is unlikely to impact plan selection. The project max payline will be updated from -13 feet MLLW to -16 feet MLLW following TSP, and may continue to be optimized during PED.

## **7.6 Project Cost**

Cost analyses indicate that the TSP would have an average annual equivalent cost of approximately \$2.2 million. Maximum annual benefits for the TSP are estimated between \$397,000 and \$948,000. Total project first cost with contingency is \$56,926,000.

### **7.6.1 Cost Apportionment**

Construction of the project would be apportioned in accordance with the Water Resources Development Act of 1986, as amended. GNF is cost-shared between the Federal government and the non-Federal sponsors. LSF features are solely the responsibility of the non-Federal sponsor. The cost-share summary is based on the project's first cost with contingency (Table 34). Section 1156 of Water Resources Development Act 1986, Cost Sharing Provisions for the Territories, as amended, provides a cost-sharing waiver to Indian tribes of an inflation-adjusted amount for studies and projects. This study has a \$511,000 cost share waiver (the amount at the time the FCSEA was signed in 2021.) The NFS cost-share of construction costs for an authorized project would also be subject to the waiver under Section 1156 (at whatever amount is applicable on the date a Project Partnership Agreement is executed.)

Table 34. Cost Share Breakdown

<b>Cost-Share Initial Calculations for Akutan Harbor Navigational Improvements Tentatively Selected Plan (Alternative 2)</b>			
	<b>Total</b>	<b>Federal</b>	<b>Non-Federal</b>
General Navigation Features (GNF)	\$41,061,300	\$36,955,200	\$4,106,100
Pre-construction Engineering /Design	\$2,053,100	\$1,847,800	\$205,300
Construction Management	\$3,079,600	\$2,771,600	\$308,000
<b>Total GNF</b>	<b>\$46,194,000</b>	<b>\$41,574,600</b>	<b>\$4,619,400</b>
Section 1156 Waiver*	\$0	\$665,000	-\$665,000
<b>Adjusted for 1156 Waiver</b>	<b>\$46,194,000</b>	<b>\$42,239,600</b>	<b>\$3,954,400</b>
TPP Ability to Pay Adjustment	\$0	\$2,965,800	-\$2,965,800
<b>Adjusted GNF Cost Share</b>	<b>\$46,194,000</b>	<b>\$45,205,400</b>	<b>\$988,600</b>
Real Estate Requirements for GNF	\$100,000	0	\$100,000
<b>Total First Cost</b>	<b>\$46,294,000</b>	<b>\$45,205,400</b>	<b>\$1,088,600</b>
Additional 10% of GNF Less Real Estate Credit	\$0	-\$4,519,400	\$4,519,400
TPP Ability to Pay Adjustment	\$0	\$3,389,600	-\$3,389,600
<b>Adjusted Adtl. 10% of GNF Less Real Estate Credit</b>	<b>\$0</b>	<b>-\$1,129,800</b>	<b>\$1,129,800</b>
Aids to Navigation	\$1,000,000	\$0	\$0
Local Service Facilities	\$10,731,600	\$0	\$10,731,600
<b>Total Cost Share</b>	<b>\$57,025,600</b>	<b>\$44,075,600</b>	<b>\$12,950,000</b>
		77%	23%

\* There are differences in the total costs shown in this table and the values displayed in the economic analysis due to some costs that were not available when the economic analysis was completed, i.e. real estate costs, etc. These cost differences are not anticipated to impact plan selection.

\* 1156 amount changes annually. The actual amount of the waiver is dependent upon the year the agreement is executed; Table includes 2023 amount.

## 7.6.2 Schedule

Table 35 below displays the project’s feasibility study schedule for milestones. This study is currently scheduled to be completed within the established timeline.

Table 35. Project Milestone Schedule

Title	Date
Execute Feasibility Cost Sharing Agreement (FCSA)	21 July 2021
Planning Charrette	14-17 October 2021
Alternatives Milestone	15 March 2022
Tentatively Selected Plan Milestone	28 April 2023
Agency Decision Milestone	21 September 2023
Final Submittal	28 March 2024
Signed Chief’s Report to Congress	16 July 2024

## 8.0 ENVIRONMENTAL CONSEQUENCES

### 8.1 Introduction

This section discusses the potential impacts of the alternatives (discussed in Chapters 5 through 7) upon the environmental resource categories described in Chapter 3, including the agency’s preferred alternative (Alternative 2/TSP) and the no-action alternative.

Regulations on NEPA analyses state that the document should, “based on the information and analysis presented in the sections on the Affected Environment and the Environmental Consequences” present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision-maker and the public” (40 CFR § 1502.14). However, as will be shown in the following sections, the three structural alternatives brought forward for analysis are, from an environmental perspective, quite similar to one another. The alternatives would each impact the same general environmental location and resources, in a similar manner, differing incrementally in the magnitude, extent, and duration of those impacts. Resource categories such as climate, tides, current, and sea level change, are addressed collectively when there is no discernable difference between the consequences of the three action alternatives. However, resource categories are addressed individually where there are differences between the three action alternatives.



Within each resource category, the magnitude of the effects upon that resource are evaluated using these criteria (where relevant) and best professional judgment, and tiered as follows:

- No Effect: not noticeable
- Minor: effects are not detectable or are so minor that they would neither destabilize nor noticeably alter any important attribute of the resource.
- Moderate: effects are sufficient to alter noticeably, but not to destabilize, important attributes of the resource.
- Major: Environmental effects are noticeable and are sufficient to destabilize important attributes of the resource.

The greatest direct impacts from project construction on several resource categories (Table 36) would be caused by:

- Placement of rock for rubble-mound breakwaters;
- Deepening of the seafloor by dredging, to include blasting;

Table 36. Project quantities by Alternative

Alt #	Area of Rock Placement (sq feet)	Area of Construction Dredging (sq feet)	Volume of Construction Dredging (cubic yards)	Likelihood of Blasting	Blasting Average Depth (ft)	Volume of Maintenance Dredging (cubic yards)
1	135,217	0	8,703	No	-	870
<b>2</b>	<b>69,777</b>	<b>48,800</b>	<b>9,840</b>	<b>Yes</b>	<b>5</b>	<b>984</b>
3	88,087	35,500	8,180	Yes	6	818
Alternative 2 is the Tentatively Selected Plan						

Dredging to create the basin and entrance channel is likely to require a combination of traditional mechanical dredging with a clamshell dredge or excavator, and hydraulic “ripping” of weathered bedrock or other dense material. The TSP is likely to require blasting to break up bedrock that cannot be removed by ripping; however, the extent of potential blasting has not yet been evaluated.

The greatest direct impacts from project operation on some biological resource categories would be caused by:

- Potential disturbance of marine mammals and birds by vessel traffic

## 8.2 Physical Environment

The following sections describe the project impacts on the physical environment.

### **8.2.1 Climate**

The no-action alternative would have no effect on the climate.

Impacts to climate are not anticipated from implementing any of the three alternatives. Given the high frequency of cyclonic storms within the north Pacific and Bering Sea, and overall low population density across the region; any changes in climate due to anthropogenic influence will be difficult to quantify. The overall impact of the project on climate is considered “no effect”.

### **8.2.2 Tides**

The no-action alternative would have no effect on the tides.

Impacts to tides are not anticipated from implementing any of the three alternatives. Tides are influenced by the interaction of the Earth and the moon and this project does not have the capacity to influence these forces. The overall impact of the project on tides is considered “no effect”.

### **8.2.3 Currents**

The no-action alternative would have no effect on currents.

Impacts to tidal currents are anticipated but are expected to be minor and localized with equal consequences for each action alternative considered. The influence of tidal currents within the proposed and alternative action areas is a major consideration in alternative development and selection. The construction of breakwaters is expected to reduce the strength of tidal currents within the harbor basin, as this is part of the reason for building a breakwater.

### **8.2.4 Wave Climate**

The no-action alternative would have no effect on the wave climate.

Reductions to the wave climate are anticipated as they are the primary purpose of building a breakwater. Effects of this reduction would be equal for each action alternative and would be limited to the area inside the breakwater. The wave climate outside the three breakwater alternatives will remain the same for all three alternatives. Overall, the impacts to the wave climate would be minor for all three action alternatives.

### **8.2.5 Sea Level Change**

Sea level change would be minor for the no-action alternative and equally minor for all three of the action alternatives since the scale of this project is not sufficient to influence sea level.

Small rates of isostatic rebound have been observed across the Aleutians, both in Akun and Unalaska. The intermediate relative sea level change (RSLC) rate of -0.82 feet was chosen for project design, and in order to maintain the project depth after the 50-year period of analysis, an additional 1 foot of dredging will be incorporated in the harbor and entrance channel design depths during construction.

### **8.2.6 Water Levels**

Storm surges can produce short term increases in water level considerably over normal tidal levels. There is no known storm surge model or study near the project area. The closest tidal gage that would capture a storm surge event is Unalaska (9462620). The highest observed water level is 6.7 feet, which when subtracted from the difference between MHHW at Unalaska (9462620) and Surf Bay (9462711) results in 3.1 feet of storm surge for the total water level. This is the best approximation of storm surge with the available data.

The no-action alternative and all three actions alternatives would have no effect on water levels.

### **8.2.7 Bathymetry**

The no-action alternative would have no effect on bathymetry.

Surf Bay is an open bight exposed to the west and north. While construction methodology is difficult to determine at this point, it is anticipated that the harbor will be built from shore (save for the breakwater). Therefore, material from the road cut will likely be used to fill in a working pad in the harbor basin to use that as a pad for drilling and blasting. After construction, this material would be removed and then the harbor would be dredged to depth.

All three action alternatives, with roughly similar dredge quantities, would result in a moderate (noticeable) increase in water depth in the area that would become the harbor basin.

### **8.2.8 Sediments**

The no-action alternative would have no effect on sediments; sediment would continue to accumulate and disperse as it always has.

Under Alternative 2 (proposed action) and Alternative 3, impacts to sediments would be short in duration but, in some cases, disruptive. For Alternative 2, approximately 9,840 CY of marine sediments within the project footprint would be subject to drilling, blasting, dredging, compression, and hydraulic and atmospheric processes. These sediments would be moved to an upland storage area. A potential site has been identified between the Surf Bay Inn and the Akutan Airport (Figure 45). Sediments at the Alternative three site would be exposed to the same processes, although the quantity for Alternative 3 is

slightly less at 8, 180 CY. Impacts of Alternatives 2 and 3 would have moderate impacts on sediments.

Initially, sediments would be fractured and pulverized during drilling and blasting; these forces would also expose sediments to wave and current action, which may mobilize some sediments or cause others to fall out of suspension.



Figure 45. Potential Dredge Material Storage Site

Wave action is rigorous enough at the project site that suspended sediments would be dispersed effectively, or they would fall out of suspension and be incorporated into the littoral sediment budget. These processes would be expected to subside over time.

Newly exposed shoreline sediments may be indirectly affected over the long-term by the implementation of the project and may experience reduced capacity for mobilization as the project's two breakwaters would likely reduce the wave energy allowed to come into contact with those sediments behind it. Similarly, those areas of protected waters behind the breakwater would likely facilitate suspended sediments to fall out and accumulate.

All three action alternatives, provided upland placement of dredged materials is implemented as planned, would require the dredged material to be dewatered and requirement mitigation measures such as silt fencing around the dredged material pile and a plan to manage the runoff and trap sediment from running into adjacent areas.

Impacts of Alternatives 2 and 3 would likely have a major impact on sediments in the short-term. However, these impacts would be expected to dissipate and ultimately result in a minor long-term impact on sediments after construction. Alternative 1 would also

have a major impact on sediments in the short term, although the material would likely not be exposed to blasting. Impacts from alternative 1 would be expected to dissipate and ultimately result in a minor long-term impact on sediments after construction.

### **8.2.9 Geology/Topography**

The no-action alternative would have no effect on geology or topography.

Alternatives 2 and 3 would result in a moderate change to topography by altering the shoreline with the access road and placing the cut between the harbor site and the upland storage location. This would be a noticeable visual alteration of the local topography. Geology would not be affected by either of these alternatives.

Alternative would have only minor impacts to topography as it would not require a large cut on the land for an access road. Geology would not be affected by this alternative.

### **8.2.10 Seismicity**

The no-action alternative and all three action alternatives would have no effect on seismicity.

### **8.2.11 Geotechnical Conditions**

The no-action alternative and all three action alternatives would have no effect on geotechnical conditions.

### **8.2.12 Water Quality**

The no-action alternative would have no effect on water quality.

During Construction Overall: Impacts to water quality would be moderate and temporary for all three action alternatives during construction. Alternative 2, the proposed action, would likely involve placement of in-water fill to server as a construction pad for drilling and blasting due the to the shallow nature of the water behind the breakwater. This fill would cause temporary and localized turbidity, but the fill would be removed along with the existing bottom to the project depth after blasting is complete. Impacts to water quality from turbidity during construction from alternatives 1 and 3 would be similar to each other in that they would be localized and temporary and likely not involve placement of in-water fill for drilling and blasting. Petroleum spills during construction are equally possible for all three action alternatives and could be caused by inadvertent spills on deck or blown hydraulic hoses or other equipment failures. While these spills could result in major effects, mitigation measures such having oil booms on deck and ready to deploy and having oil-absorbent pads available would likely reduce the potential impacts of a spill to water quality to the moderate effect level.

During In-water Construction: Water quality at the Akun Island site would be impacted by increased turbidity levels associated with drilling, blasting, and dredging. These impacts would be most apparent during or immediately after each of these iterations before wave action, and sediment fallout would return water turbidity levels to ambient conditions. Sediment characteristics at the site suggest that due to its high energy and likely high percentage of bedrock, sediment fallout would be rapid. Despite multiple iterations of drilling, blasting, and dredging required to implement the proposed project, impacts to water quality as a result of turbidity during in-water construction moderate and temporary. While blasting is likely unnecessary for Alternative 1, this activity is not one that would likely contribute much to the increase of suspended sediment, so the potential effects from not having blasting for this alternative would not change the overall magnitude of effects for this alternative in terms of water quality.

During Upland Construction: Runoff from the disturbed and exposed ground in proximity to or associated with the proposed project site during construction represents a more likely source of fine particulate material that could impact water quality due to turbidity. The effects of this potential runoff would likely be minor for Alternative 3 as it would use the existing access road to the old hovercraft pad but would be moderate for Alternatives 1 and 2 as there would be a likely be a new road cut down to the site from the Surf Bay Inn area. Akun Island's coastal wave climate and currents would effectively reduce impacts from this source of turbidity. However, an effective stormwater pollution prevention plan would be implemented to greatly reduce such impacts. Impacts to water quality from upland construction from project-related runoff would be minor with the implementation of a comprehensive stormwater pollution prevention plan.

During Upland Placement of Dredged Materials: Potential effects of runoff from all three action alternatives are anticipated to be moderate but would be reduced to minor by implementation of a Storm Water Pollution Prevention Plan (SWPPP). A SWPPP would be developed by the construction contractor and reviewed approved by the Alaska Department of Environmental Conservation.

During In-water Placement of Dredged Materials: In-water placement of dredged materials for beneficial use (marine habitat creation) is not part of the recommended plan for this project, but the potential impacts are evaluated here for comparison purposes. Potential effects would be similar for all action alternatives in that they involve similar materials and quantities and effects are expected to be moderate and temporary. Placement would likely be from a bottom-dump or split-hull dump scow, so dredged material would enter the water from below the water surface to minimize turbidity. A small and localized turbidity increase would occur but would be likely be dispersed rapidly given the wave environment and currents at the potential beneficial use site. Unlike upland placement, it is not possible to contain the sediment that is dispersed from in-water placement of dredged materials. Mitigation measures such as silt curtain are not implementable in the open marine environment due to waves and currents.

During Harbor Operations: Potential effects to water quality from harbor operations would be the same for all three action alternatives and would be no more than minor level. Minor and temporary effects from localized petroleum releases are possible since a vessel will be operating in an area where they do not currently operate (i.e., a new harbor basin) and also along the vessel route between Akun and Akutan with routine traffic. Other than an unforeseeable catastrophic incident such as a grounding or sinking, effects from petroleum spills during operation would be minor since the vessel would not be moored at then new site on Akun Inland. It would arrive and depart daily as needed but would only be at the new basin for a short time on days it makes the trip. This is different than a scenario where a new harbor is built, and many vessels are present continuously. The ferry vessel for this project would likely be moored full time at the existing small boat harbor at the head of Akutan Harbor where materials are staged to deal with unexpected spills.

### **8.2.13 Air Quality**

The no-action alternative would have no effect on air quality.

Under all three action alternatives, the operation of construction equipment and vessels during project construction would, in the short term, add incrementally to the air pollutant emissions ordinarily generated by vessels and machinery on Akun Island. Direct, short-term project-related impacts to air quality on Akun Island would be highly variable and transitory, where noticeable at all, and would thus be categorized as minor for all three alternatives. The area and surrounding region of Akun Island is designated as “unclassified” under EPA air quality regulations, as insufficient information exists to designate it as an “attainment” or “nonattainment” area (18 AAC 50.015). Without an air quality baseline, it is impossible to determine whether direct, construction related emissions would cause exceedances of air quality standards on Akun Island.

It is anticipated that the project operation will not create any new stationary sources of air emissions. Indirect, long-term effects of the project on ambient air quality would be dependent on the number and type of mobile sources (i.e., vessels) that use the new harbor. These would be primarily small watercraft with combustion engines (i.e., gasoline and diesel fuel), including the contracted ferry vessel. Based on the harbor configurations, there is only room for a small number of vessels, and it is likely that all of them would be transient. Overall, effects on air quality from operations is anticipated to be minor.

### **8.2.14 Noise**

The no-action alternative would have no effect on noise. Helicopter flights would continue to be part of the noise environment in the air and to a smaller extent underwater beneath the aircraft both on Akun Island, Akutan Island and the open water segment in between these locations.

During Construction Overall: Impacts on both airborne and in-water noise levels would be moderate during most of construction and periodically major during blasting and pile driving for the access dock. Although Alternative 1 is unlikely to have blasting, airborne and underwater noise levels would likely be major, although temporary, due to the need for in-water pile driving as with the other two action alternatives.

The operation of heavy equipment such as loaders, excavators, cranes, dump trucks, and impact pile drivers during construction could occur at times in 24-hour shifts to take advantage of seasonal daylight periods. Concurrently, the operation of drilling and dredging barges, confined underwater blasting, dredging, keying in armor stone (placement), and pile driving would contribute to the overall impact on noise, both in the air and underwater.

During Harbor Operations: Airborne noise during harbor operations would be moderate, temporary and transient. The ferry vessel would make noise that could be heard in the air, but it would be like existing commercial vessels that routinely operate in the area. Helicopter noise would no longer be a routine part of the airborne noise environment, which would reduce the overall noise environment despite the addition of a ferry vessel.

### **8.2.15 Climate Change**

The no-action alternative and all three action alternatives would have no effect on climate change.

## **8.3 Natural Environment**

The following sections describe the TSP's impacts on biological resources.

### **8.3.1 Marine Environment**

#### **8.3.1.1 *Marine Fish and Invertebrates***

The no-action alternative would have no effect on marine fishes and invertebrates.

During Construction Overall: Impacts to fish for alternative 1 would be the lowest of the three alternatives since there would likely be no blasting. Impacts from other sources (dredging, pile driving, etc.) would result in an overall moderate level of impact for Alternative 1.

Alternatives 2 and 3 would likely involve blasting in addition to the pile driving, dredging, and rock placement. This blasting could have a minor impact on fish and invertebrates if a fill pad is constructed and drilling took place "in the dry" behind the rubble-mound breakwater. If blasting took place when water was present above the substrate, it is likely that most of the fish inside the basin would be killed or injured during the blasts, resulting in major, although localized and temporary, effects. All charges would be



detonated underground in boreholes and charges would be stemmed to confine as much of the blast as possible to the ground to break the rock, but there would still be pressure waves that would kill or insure fish, particularly those with swim bladders. If blasting occurred without a fill pad the localized effects would be major, but the loss of fish in a small basin would overall be minor in the context of Surf Bay and Akutan Harbor. Many invertebrates, with the exception of some cephalopods, lack the innate motility to extract themselves from acute disturbance quickly. As such, impacts from project-related in-water construction activities would pulverize, crush, dislodge, increase susceptibility to predation, and injure or kill invertebrates within the proposed project area.

Construction of the breakwater would represent the loss of less than 1 acre (Alternative 2) to 3 acres (Alternative 1) of existing subtidal habitat, replacing it with relatively steep, rocky subtidal, intertidal, and supratidal habitat. Marine invertebrates would be temporarily impacted by in-water project-related actions that alter the geometry of, fracture, dislodge, crush-together, cover, and/or bury the sediments and substrates that they use for attachment, cover, feeding, egg-laying, and breeding.

During Construction In-water Dredged Material Placement: In-water placement of dredged materials for beneficial use (marine habitat creation) is not part of the recommended plan for this project, but the potential impacts are evaluated here for comparison purposes. Potential effects would be similar for all action alternatives in that they involve similar materials and quantities and effects are expected to be moderate and temporary. Placement would likely be from a bottom-dump or split-hull dump scow, so dredged material would enter the water from below the water surface to minimize turbidity. A small and localized turbidity increase would occur but would be likely be dispersed rapidly given the wave environment and currents at the potential beneficial use site. Once placed, the dredged material would eventually colonize with algae and would likely be used by both fish and invertebrates as it would introduce rocky substrate and vertical structure to what was a bottom composed of sand waves, shell litter, and sparse algae.

Permanent impacts on marine invertebrates resulting from the implementation of Alternative 2 include decreased wave energy and increased depth in the harbor entrance channel and mooring basin behind the breakwater structure and an overall increase in the quantity of rocky reef-type substrate at the breakwater and dredged material placement areas. Despite being permanent, over time, these impacts would likely be beneficial to some marine invertebrate communities by providing suitable substrate and structure for colonization. Similarly, over time, and despite alterations to the existing habitat, invertebrate communities would recover to some degree of equilibrium in the inner basin and at the dredged material placement site. Organisms generally precluded from the surf and intertidal zones may find the deeper, calmer waters of the inner basin suitable for settlement, while at the material placement area, those species whose life history is dependent upon rocky reef type habitat would be expected to colonize the habitat and eventually reach some degree of equilibrium. In

total, USACE would expect invertebrate community compositions at the affected habitats to change over time following the implementation of the project. However, USACE acknowledges that its data concerning the intertidal and subtidal marine invertebrate community at the project location is limited and that the exact scenario and rate at which the affected habitats might become recolonized is unknown.

During Construction Operations: The construction on rubble mound breakwaters is anticipated to create habitat for certain species of nearshore fish that depend upon rocky habitat. Permanent impacts on marine invertebrates resulting from the implementation all action alternatives include decreased wave energy and increased depth in the harbor entrance channel and mooring basin behind the breakwater structure and an overall increase in the quantity of rocky reef-type substrate at the breakwater and dredged material placement areas. Despite being permanent, over time, these impacts would likely be beneficial to some marine invertebrate communities by providing suitable substrate and structure for colonization. Similarly, over time, and despite alterations to the existing habitat, invertebrate communities would recover to some degree of equilibrium in the inner basin and at the dredged material placement site. Organisms generally precluded from the surf and intertidal zones may find the deeper, calmer waters of the inner basin suitable for settlement. In total, USACE would expect invertebrate community compositions at the affected habitats to change over time following the implementation of the project. However, USACE acknowledges that its data concerning the intertidal and subtidal marine invertebrate community at the project location is limited and that the exact scenario and rate at which the affected habitats might become recolonized is unknown.

It is possible that black rockfish might concentrate in the harbor basin after construction. As such, harbor design alternatives closer to the mouth of the salmon stream near the helipad were not selected due to local concerns that the possible presence of black rockfish in the new harbor could impact juvenile salmon exiting the creek.

### **8.3.1.2 Marine Mammals**

The no-action alternative would have no effect on marine mammals (non-ESA-listed species).

During Construction: The effects on marine mammals (non-ESA-listed species) during construction would be moderate to major for Alternative 1 (assuming no blasting) but be temporary in nature. While moderate impacts are likely during most of construction, major impacts (i.e., disruptive) could occur during pile driving.

The effects on marine mammals during construction would be moderate to major for Alternatives 2 and 3 (assuming blasting) but be temporary in nature. While moderate impacts are likely during most of construction, major impacts (i.e., disruptive) could occur during pile driving and blasting. Effects to marine mammals as a resource

category are considered major in that there will be disruption (for which USACE is seeking an IHA) but effects would not result in mortality and would be limited to the period of construction involving blasting and pile driving.

The decision process for how to address potential impacts to non-ESA-listed marine mammals under the Marine Mammal Protection Act is to either issue a “no effect” determination, which is a decision made solely by the action agency and does not receive approval from NMFS or USFWS, or to request an Incidental Take Authorization (ITA) from one of both agencies. This ITA can take the form of an Incidental Harassment Authorization (IHA) or a Letter of Authorization (LOA). Based on the limited information understood at this point in the planning process, seeking an IHA is probably the most appropriate path forward. An IHA will be required from NMFS and USFWS. IHAs will be sought during the PED phase (under an exception to USACE policy requiring ESA consultation during the feasibility process) due to the IHA timeline and design data needed for the IHA permit application.

The IHA allows for marine mammals to be harassed without the need to shutdown project construction except when they are very close to sound sources that could result in permanent damage or lethality. Without the IHA in place, shutdown distances are too great to allow for efficient construction and the zones are so large as to not be reasonable to be able to ensure that marine mammals are not present inside the zones. Potential radii to consider for blasting and pile driving shown in Figure 46 represent estimated shutdown zones that would have to be adhered to if an IHA is not obtained. Without an IHA these zones will have to be free of marine mammals before detonation or pile driving. With an IHA, zones are monitored for exposure and are only shutdown for Level A exposure radii (e.g., 550 m for high frequency cetaceans for blasting).

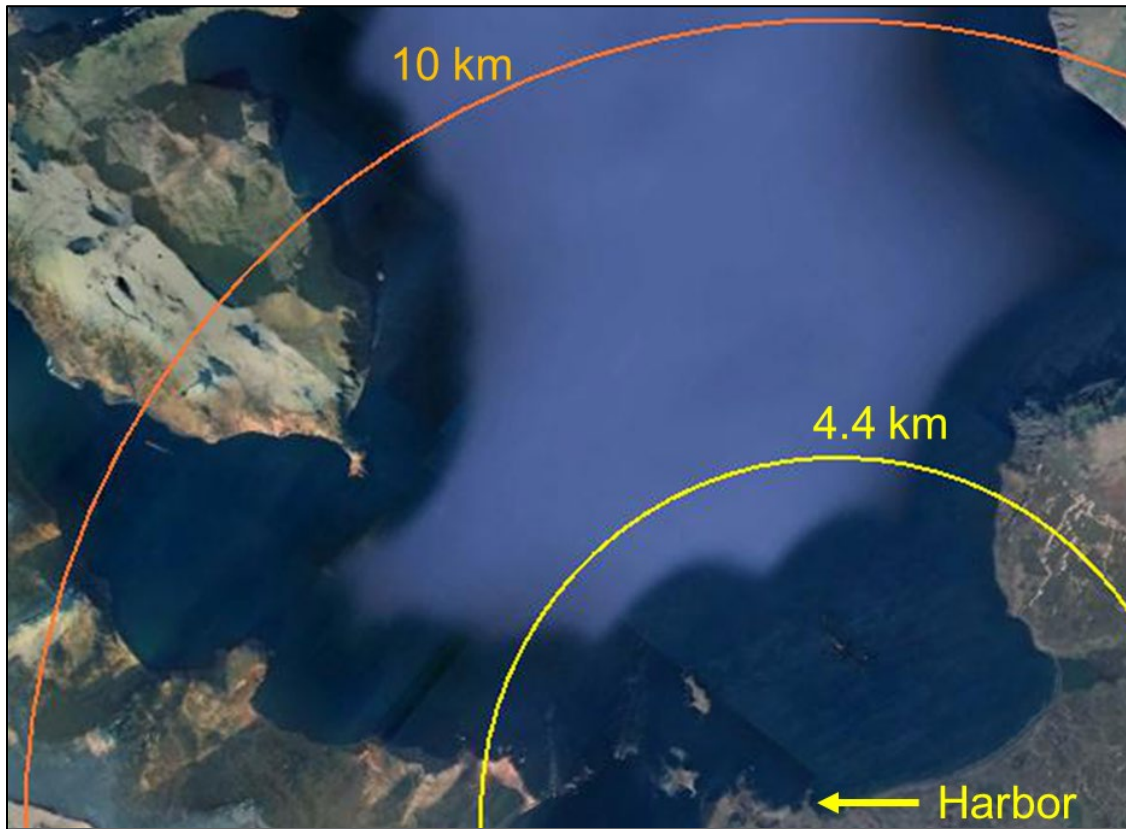


Figure 46. Potential shutdown zones if IHA were not obtained

### **8.3.1.3 Marine Birds**

The no-action alternative would have no effect on marine birds.

Under all three action alternatives, marine birds within the area of construction may be displaced in the short term due to construction activities and result in overall moderate effects. Marine birds within the construction area are typically limited to gulls, kittiwakes, and small numbers of pigeon guillemots. Other marine birds, such as tufted puffins, were not observed in or near the construction footprint of any of the alternatives during the June 2022 shore-based marine mammal surveys or the June 2023 boat-based survey. The nearest aggregations of puffins were on the water on the NE side of Green Island approximately 1.2 miles from any of the harbor site alternatives. No nesting habitat for marine birds is present near any of the harbor alternatives. Nesting puffins and other seabirds likely nest on the south side of Green Island, but this is not in direct line of site to the harbor alternatives. Tufted puffins and other seabirds do nest in Lost Harbor, but this is over 4 miles from the project site and not in the line of site of the project.

Under all action alternatives, long-term impacts to marine birds near the project site would be minor once the harbor becomes operational. Given that the number of seabirds occupying Green Island is dependent on seasonality (i.e., breeding and nesting) the colonies are distant enough to result in minimal, if any, disturbance during construction. Vessel transits between Akun and Akutan would occur at slow speeds (likely under 10 knots) and would not transit near to seabird aggregations on the water next to Green Island since it is necessary to stay well north of Green Island to avoid the large tide rips that are commonly present. Lighting present on the dock at Akun would be downward shielded to minimize the likelihood of attracting seabirds and causing collisions with structures.

## **8.3.1 Terrestrial Environment**

### **8.3.1.0 Terrestrial Mammals**

The no-action alternative would have no effect on terrestrial mammals.

Alternative 1 and 2 would have minor effects on terrestrial mammals such as foxes and cattle. Construction of the new road cut may temporarily displace these animals during construction, but these animals are very tolerant of human presence.

Alternative 3 would also have a minor impact on terrestrial mammals as they sometimes are encountered crossing the road, but the only new road section on land would be on the beach between the old hovercraft pad and new harbor site.

### **8.3.1.1 Terrestrial Birds**

The no-action alternative and Alternative 3 would have no effect on terrestrial birds.

Alternative 1 and 2 would have minor effects on terrestrial birds. Construction of the new road cut may temporarily displace these animals during construction. Vegetation clearing would take place outside of migratory bird nesting windows or a nest survey would be conducted before construction. The only possible nesting habitat in the road cut area is for ground-nesting birds. These birds are unlikely to nest in this area due to cattle traffic and the presence of fox on Akun Island.

#### **8.3.1.2 Terrestrial Vegetation**

The no-action alternative and Alternative 3 would have no effect on terrestrial vegetation.

Under Alternatives 1 and 2, it is anticipated that any potential effects on terrestrial vegetation will be limited to the project area during construction activities. The wetland depression near the upland dredged material storage area would be avoided the ephemeral drainage that leads from this wetland would be routed into a vegetated swale along the side of the road cut. Overall, the effects of Alternatives 1 and 2 would be minor.

#### **8.3.2 Essential Fish Habitat Analysis**

The no-action alternative would have no effect on Essential Fish Habitat.

Under all action alternatives, EFH would be adversely affected by in-water construction-related activities: drilling, blasting, dredging of sediments, and the placement of breakwater materials. Some features of the existing EFH would essentially undergo permanent conversion from sandy subtidal-type habitat to a gradation of rocky subtidal, intertidal, and supratidal-type habitats as an effect of breakwater material placement. However, these effects and the permanent loss of some sandy subtidal-type habitat are expected to be limited in scope compared to the quantity and quality of existing EFH in the eastern Aleutian Islands region. Temporary adverse impacts to EFH from construction activities such as increased turbidity, underwater noise, and the presence of construction equipment and vessels is expected to be highly localized.

The USACE has coordinated with NMFS Habitat Division regarding potential dredge material fates and locations, and there exists the potential that EFH adjacent to the project area could be enhanced by the in-water placement of dredged materials through the creation of rocky reef-type habitat where sandy bottom-type habitat currently exists. While upland storage of dredged materials for reuse in the uplands on Akun Island is the intended course of action, it is noted that there could be potential EFH enhancement opportunities should the dredged materials need to be placed in water if there are new developments during the PED phase of this project. The USACE would coordinate any potential EFH enhancement actions with NMFS Habitat Division.

The USACE engaged NMFS Habitat Division early in the development of this project and was able to minimize the extent of the impact to EFH through the site selection and project footprint size process. The USACE similarly provided the language included in this document as its preliminary assessment of effects to EFH to NMFS Habitat Division and in response, NMFS Habitat Division recommended that the timing of any potential blasting activities be offset to the greatest degree practicable with the known salmon immigration and outmigration periods of the adjacent salmon bearing stream. NMFS Habitat Division also noted that compensatory mitigation for the loss of or permanent conversion of EFH was not being offered.

### **8.3.3 Federal and State Threatened and Endangered Species**

The no-action alternative would have no effect on threatened and endangered species.

As discussed in Section 8.3.1.2 (Marine Mammals), an IHA would be pursued during the PED phase of this project. As part of the overall IHA process, when ESA-listed marine mammals are included in the IHA application a Biological Assessment is prepared by USACE and Biological Opinion would be prepared by USFWS and NMFS. This ESA consultation process cannot precede the IHA process since take numbers agreed upon in the IHA inform the ESA consultation. Steller's eiders, since they are not marine mammals, are not part of the IHA process, but they would be included in the USFWS BA so that all USFWS species would be covered under a single consultation using the most up to date information from the PED phase.

As they will be discussed in the IHA (except marine birds) and BA during the PED phase, discussions about individual species of ESA-listed species is not presented in this section. Based on what is already generally understood about the project construction and the ESA-listed species there does not appear to be any chance of a jeopardy determination for any listed species. Effects to ESA species as a resource category are considered major in that there will be disruption (for which we are obtaining an IHA) but effects would not result in mortality and would be limited to the period of construction involving blasting and pile driving.

### **8.3.4 Special Aquatic Sites**

The no-action alternative would have no effect on Special Aquatic Sites.

None of the action alternatives would affect the Alaska Maritime National Wildlife Refuge as there is no land managed by them inside the project footprints. All three action alternatives also avoid the anadromous stream near the old hovercraft pad. There would be no effect to the refuge or the anadromous stream.

Intertidal habitat (i.e., vegetated shallows) would be subject to moderate impacts from the construction of any of the three action alternatives. Over time, the new breakwaters

and harbor basin would colonize with algae and invertebrates and also serve as fish habitat.

#### **8.4 Subsistence Use**

Section 803 of the Alaska National Interest Lands Conservation Act (ANILCA) defines subsistence use as “the customary and traditional uses by rural Alaska residents of wild, renewable resources for direct personal or family consumption of food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of nonedible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade.” Subsistence activities are of vital importance to the community of Akutan. This section analyzes whether the proposed alternatives would impact access to subsistence opportunities at Akun Island.

The Alaska Land Use Council wrote that a significant restriction of subsistence use occurs if “a proposed action... can be expected to result in a substantial reduction in the opportunity to continue subsistence uses of renewable resources” (ALUC 1984). Additionally, the U.S. District Court Decision of Record in *Kunaknana vs. Watt* [No. A83-337 CIV, D. Alaska Dec. 20, 1983] stated that “restrictions for subsistence uses would be significant if there were large reductions in abundance or major redistribution of these resources, substantial interference with harvestable access to active subsistence-use sites, or major increases in non-rural resident hunting.” These access concerns include not only the physical access to subsistence areas but potential increases of the cost of their use and potential increases in competition for subsistence resources.

The no-action alternative would have no effect on current access to or use of subsistence resources on Akun Island.

The action alternatives all have the possibility of increasing the community of Akutan’s access to subsistence resources on Akun Island. A safe harbor may allow additional community members to travel to Akun Island to participate in subsistence fishing, harvesting, or other related activities. Of the three alternatives, a concern has been expressed that Alternative 3 may impact juvenile salmon out-migrating from the nearby salmon stream due to the creation of more rocky habitat, which could increase predation by rockfish species.

#### **8.5 Cultural Resources**

The no-action alternative would allow natural and biological erosion activities to continue to impact cultural resources in Surf Bay.

The action alternatives all have a similar potential to impact subsurface archaeological sites. All alternatives are located within the Surf Bay Archaeological District (UNI-00103), which is comprised of multiple known and unknown subsurface cultural



features. Any ground-disturbing activities, such as the construction of a road from the airport to the harbor, are likely to have an adverse effect on historic properties.

The TSP, Alternative 2, would involve significant ground-disturbing activities in the Surf Bay Archaeological District (UNI-00103) which are likely to have major impacts on historic properties. Per 36 CFR § 800.5(d)(2), USACE has determined that the TSP would have the potential to have an adverse effect on historic properties and has requested concurrence on this assessment from the Alaska State Historic Preservation Officer (SHPO). If SHPO concurs, USACE would work with the SHPO, the City of Akutan, the Native Village of Akutan, and other stakeholders to resolve the adverse effect in accordance with 36 CFR § 800.6.

Due to the subsurface nature of the cultural features of the historic property, the adverse effect would be resolved through the development and execution of a Programmatic Agreement (PA) in accordance with 36 CFR § 800.14(b)(1)(ii). This PA will be executed prior to the final draft of the IFR/EA, and the identified mitigation therein will be implemented prior to construction of the TSP.

## 8.6 Other Required Analyses

### 8.6.1 Protected Tribal Resources

The Executive Memorandum on Government-to-Government Relations with Native American Tribal Governments of 1994, the Department of Defense American Indian and Alaska Native Policy of 1998, and the Department of the Army Memorandum on American Indian and Alaska Native Policy of 2012 require that USACE assess the impact that Federal projects may have on protected tribal resources and assure that the rights and concerns of Federally Recognized Tribes are considered during the development of such projects. Protected tribal resources are defined by the Department of the Army as those natural resources and properties of traditional or customary religious or cultural importance, either on or off Tribal lands, retained by, or reserved by or for Federally Recognized Tribes through treaties, statutes, judicial decisions, or executive orders. The Federal government’s trust responsibility, deriving from the Federal Trust Doctrine and other sources, for these protected tribal resources is independent of their association with Tribal lands.

This trust responsibility is discharged in this report through compliance with multiple statutes affecting protected tribal resources (Table 37). The U.S. Government has no treaties with any Alaska Native Tribes. Therefore, in this report, Protected Tribal Resources are generally understood to include natural resources, cultural resources, and access to subsistence resources. No specific resource(s) have been identified by the Native Village of Akutan.

Table 37. Sections that address Protected Tribal Resources

Topic	Report Section	Statute	Potential Effects
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Natural Resources	Section 3.1 Section 3.2 Section 8.2 Section 8.3	Migratory Bird Protection Treaty Act of 1918, National Environmental Policy Act of 1970, Marine Mammal Protection Act of 1972, Clean Water Act of 1972, Endangered Species Act of 1973, Magnusson-Stevens Fisheries Conservation and Management Act of 1976	Minor Impacts
Cultural Resources	Section 3.4.3 Section 8.5	National Historic Preservation Act of 1966, National Environmental Policy Act of 1970, American Indian Religious Freedom Act of 1978, Abandoned Shipwreck Act of 1988, E.O. 13007 "Indian Sacred Sites"	Major Impacts
Subsistence Use	Section 3.4.2 Section 8.4	Marine Mammal Protection Act of 1972, Endangered Species Act of 1973, Alaska National Interest Lands Conservation Act of 1980	Minor Impacts
Environmental Justice	Section 8.6.2	Clean Air Act of 1963, National Environmental Policy Act of 1970 E.O. 12898 "Environmental Justice"	Minor Impacts

### 8.6.2 Environmental Justice and Protection of Children

In accordance with EO 12898, Federal agencies are required to identify any adverse environmental or human health impacts anticipated from the proposed project, and to determine whether those impacts would disproportionately affect minority and/or low-income communities. Additionally, in accordance with EO 13045, Federal agencies are required to identify any impacts that would disproportionately affect children.

The community of Akutan has been identified as a disadvantaged community.

#### 8.6.2.1 Identification of Adverse Impacts

The proposed development of a harbor at Akun Island does not have the potential to increase the negative impact of any of the twelve environmental justice indices identified by EJScreen on the community of Akutan: Particulate Matter 2.5, Ozone, Diesel Particulate Matter, Air Toxics Cancer Risk, Air Toxics Respiratory Hazard Index, Traffic Proximity, Lead Paint, RMP Facility Proximity, Hazardous Waste Proximity, Superfund Proximity, Underground Storage Tanks, Wastewater Discharge. Any harbor development at Akun Island is 7 miles from the community of Akutan. Although some indices may be increased temporarily at the harbor location during construction, they are not expected to impact the community of Akutan itself.

#### 8.6.2.2 Determination under E.O. 12898

USACE has determined that the proposed project would not have any adverse environmental or human health impacts that would disproportionately affect minority and/or low-income communities. The proposed project may be a benefit to the public health and safety of an economically disadvantaged community by increasing access to natural resources for subsistence purposes, increasing local and regional economic opportunities, increasing welfare of the local population, and adding social and cultural value to the community.

### **8.6.2.3 Determination under E.O. 13045**

USACE has determined that there would be no disproportionate health or safety risks to children as a result of the proposed project.

### **8.6.3 Cumulative and Long-Term Impacts**

The Council on Environmental Quality's (CEQ) regulations for implementing the National Environmental Policy Act (NEPA) define cumulative effects as the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-federal) or person undertakes such other actions (40 CFR § 1508.7).

### **8.6.4 Unavoidable Adverse Impacts**

The TSP would replace 1.6 acres of sandy near shore benthic habitat with rubble-mound breakwaters. Constructing the navigation improvements for Akutan would introduce new, minor sources of air emissions, noise, and potential contamination to Akutan, in the form of the ferry vessel replacing helicopter operations between Akutan and Akun Islands. It is likely that the TSP will have an unavoidable adverse effect on subsurface cultural features associated with the Surf Bay Archaeological District, a historic property. The potential adverse effect to this historic property will be resolved in the development and execution of a PA under NHPA.

### **8.6.5 Incomplete or Unavailable Information**

Information that would be required before construction of the TSP, but which has been unavailable during Feasibility Phase, includes:

- Project-specific geotechnical information.
- Project-specific physical characterization of the material to be dredged.
- Refinement of the location of the proposed dredged material disposal area through soundings and underwater imagery.
- Quantitative surveys of marine mammal presence within the project area.

### **8.6.6 Comparison of the Effects of the Project Alternatives**

Table 38 summarizes the Environmental Effects by Alternative for the various project related resource categories.

Table 38. Environmental Effects by Alternative

Resource Category	No Action Alternative	Alt 1	Alt 2	Alt 3
Climate	No Effect	No Effect	No Effect	No Effect
Tides	No Effect	No Effect	No Effect	No Effect
Currents	No Effect	Minor	Minor	Minor
Wave Climate	No Effect	No Effect	No Effect	No Effect
Sea Level Change	Minor	Minor	Minor	Minor
Water Levels	No Effect	No Effect	No Effect	No Effect
Bathymetry	No Effect	Moderate	Moderate	Moderate
Sediments	No Effect	Minor	Minor	Minor
Geology and Topography	No Effect	Minor	Moderate	Moderate
Seismicity	No Effect	No Effect	No Effect	No Effect
Geotechnical Conditions	No Effect	No Effect	No Effect	No Effect
Water Quality	No Effect	Moderate	Moderate	Moderate
Air Quality	No Effect	Minor	Minor	Minor
Noise	No Effect	Moderate	Major	Major
Climate Change	No Effect	No Effect	No Effect	No Effect
Marine Fishes and Invertebrates	No Effect	Moderate	Major	Major
Marine Mammals	No Effect	Major	Major	Major
Marine Birds	No Effect	Moderate	Moderate	Moderate
Terrestrial Mammals	No Effect	Minor	Minor	Minor
Terrestrial Birds	No Effect	Minor	Minor	Minor
Terrestrial Vegetation	No Effect	Minor	Minor	No Effect
Essential Fish Habitat	No Effect	Moderate	Moderate	Moderate
Threatened and Endangered Species	No Effect	Major	Major	Major
Special Aquatic Sites	No Effect	Moderate	Moderate	Moderate
Cultural Resources	No Effect	Major	Major	Major
Subsistence Use	No Effect	Minor	Minor	Moderate

## 8.7 Mitigation Measures

The following sections discuss the cultural and biological mitigation actions that could be proposed with implementation of the TSP, Alternative 2. The USACE would implement a suite of mitigation measures designed to minimize the impact of the project on the area’s biological and cultural resources. While these measures would reduce the potential impacts on resources, they would not eliminate them entirely and it is anticipated that direct and indirect impacts would result from project activities.

### 8.7.1 Cultural Resources

As described in Section 8.5, a programmatic agreement will be developed to resolve adverse effects to historic properties in accordance with the National Historic Preservation Act.

## 8.7.2 Biological Resources

Mitigation actions include those measures that would avoid, minimize, and implement best management practices that have been identified and refined as a function of the resource agency coordination processes for the purpose of conserving relevant resources. Avoidance and minimization mitigation concepts such as those that related to confined underwater blasting and pile driving, will be developed through interagency coordination.

## 8.8 Summary of Potential Mitigation Measures

*For avoiding and minimizing impacts to water quality:*

1. Dredging would be conducted to minimize the amount of suspended sediment generated. Best management practices may include:

- Avoiding multiple bites while the bucket is on the seafloor.
- No stockpiling of dredged material on the seafloor.
- No leveling of the seafloor with the dredge bucket.
- Slowing the velocity (i.e., increasing the cycle time) of the ascending loaded clamshell bucket through the water column.
- Pausing the dredge bucket near the bottom while descending and near the waterline while ascending.
- Placing filter material over the holding-scow scuppers to remove sediment from the return water.

2. The contractor would be required to prepare an Oil Spill Prevention and Control Plan. Reasonable precautions and controls would be used to prevent incidental and accidental discharge of petroleum products or other hazardous substances. Fuel storage and handling activities for equipment would be sited and conducted, so there is no petroleum contamination of the ground, surface runoff, or water bodies. Equipment would be inspected daily for leaks. If leaks are found, the equipment would not be used and pulled from service until the leak is repaired. During construction, spill response equipment and supplies such as sorbent pads shall be available and used immediately to contain and clean up oil, fuel, hydraulic fluid, antifreeze, or other pollutant spills. Any spill amount must be reported in accordance with Discharge Notification and Reporting Requirements (AS 46.03.755 and 18 AAC 75 Article 3).

*For avoiding and minimizing impacts to air quality:*

The contractors would be required to use equipment that is in good repair and meets applicable emission standards. Best management practices such as wetting work surfaces would be applied if visible lofted dust is noted.

*For avoidance and minimization of impacts to pinnipeds and cetaceans:*

These measures are extensive and will be covered in detail in the Marine Mammal Monitoring and Mitigation Plan (4MP) that would be prepared as part of the IHA or LOA application process. Additional mitigation measures could be required as part of the Biological Opinions from NMFS and USFWS.

*For avoidance and minimization of impacts to EFH:*

1. Piles would be driven with a vibratory hammer to the extent practicable. Pile driving can generate intense underwater sound pressure waves that can disrupt migration and injure or kill fish. Vibratory hammers produce less intense sounds than impact hammers (NMFS 2005). If an impact hammer is required because of substrate type or the need for seismic stability, piles would be driven as deep as possible with a vibratory hammer before the impact hammer is used.

## **9.0 PUBLIC AND AGENCY INVOLVEMENT**

### **9.1 Public/Scoping Meetings**

#### **Planning Charrette – 15-16 November 2021**

A planning charrette was held in Akutan 15-16 November 2021. This public meeting served as a scoping exercise to assist USACE define its overall project objectives. It was decided over the course of the charrette to study the feasibility of implementing navigational improvements between the community of Akutan and the Akutan Airport on Akun Island.

#### **Community Meeting in Akutan – 11-14 October 2022**

USACE team members presented at public meetings in Akutan, which were held in several location over four days and attended by approximately 14 community members and 3 Trident Seafoods personnel. The purpose of this meeting was for USACE subject matter experts to present and coordinate with the community, to continue open communication with the sponsor on the Akutan Harbor Navigation Improvements project, gather key information to inform OSE analysis for feasibility, interview Trident to gather information for FWOP conditions, and document existing conditions through photos.

#### **Aleutians East Borough Assembly Meeting – 08 March 2023**

USACE POA team members presented the TSP to the AEB Assembly in March of 2023. The AEB was unanimous in their support of Alternative 2 as the TSP.

#### **Native Village of Akutan Meeting – 23 March 2023**

USACE POA team members presented the TSP to the Native Village of Akutan on 23 March 2023. The Tribe was supportive of Alternative 2 as the TSP.

## 9.2 Government to Government

The Native Village of Akutan, which is the Federally Recognized Tribe of Akutan, is the Non-Federal Co-Sponsor of this study. The Native Village of Akutan has not requested formal Government-to-Government consultation. USACE invited the Native Village of Akutan to pursue Government-to-Government consultations in December 2021, when this study was started.

## 9.3 Federal and State Agency Coordination

Agency Coordination is underway and ongoing with ADEC, USEPA, NMFS and USFWS. Information on the status of this communication can be found in Table 39, Environmental Compliance Table.

## 9.4 Status of Environmental Compliance

Environmental compliance is on-going and will not be completed in the Feasibility phase (Table 39). A USACE policy waiver, permitting POA to conclude MMPA/ESA consultation during the Preconstruction, Engineering and Design (PED) phase, is under development.

Table 39. Environmental Compliance Table  
 Items are fully completed (FC), partially complete (PC), or not applicable (N/A).

Federal Statutory Authority	Compliance Status	Compliance Date/Comment
Clean Air Act	FC	This project is not reasonably expected to negatively impact air quality. This project is not located in a CAA non-attainment area, and the conformity requirements of the CAA are not applicable.
Clean Water Act	PC	Upon receipt of 401 certification. Dredge placement area is planned for upland storage for reuse.
Coastal Zone Management Act	N/A	As of July 1, 2011, the CZMA Federal consistency provision no longer applies in Alaska.
Endangered Species Act	PC	Marine mammal and ESA-listed bird surveys complete with data discussions with USFWS/NMFS. ESA compliance will be finalized during the IHA/LOA process in PED, pending approval of policy exception.
Marine Mammal Protection Act	PC	Will be addressed in PED with either and IHA or LOA application.
Magnuson-Stevens Fishery Conservation and Management Act	PC	EFH Assessment being prepared for submission to NMFS.
Fish and Wildlife Coordination Act	PC	USFWS will not prepare a FWCA Report. They reserve most of their input for the MMPA and ESA process when we have additional project details.

Marine Protection, Research, and Sanctuaries Act	PC	Upland storage of dredged materials is planned.
Migratory Bird Treaty Act	PC	Pending conservation measures from USFWS.
National Historic Preservation Act	PC	Letter identifying a finding of “adverse effect” on historic properties was submitted to SHPO and other stakeholders on 17 June 2023
National Environmental Policy Act	PC	Pending completion of the EA/Feasibility Report.
Executive Order 11990: Protection of Wetlands	FC	Conservation measures will endeavor to protect the wetlands along the access road where applicable.
Executive Order 12898: Environmental Justice	FC	Does not disproportionately affect underserved communities.
Executive Order 13045: Protection of Children from Environmental Health Risks and Safety Risks	FC	Does not disproportionately affect the health or well-being of children.
Executive Order 13186: Protection of Migratory Birds	PC	Pending conservation measures from USFWS.

### 9.5 Views of the Sponsor

Both the Native Village of Akutan and the Aleutians East Borough support the findings of this study and understands the cost share for design and construction of the TSP, Alternative 2.

## 10.0 PREPARERS OF THE ENVIRONMENTAL ASSESSMENT

The Environmental Assessment was prepared by members of the USACE Alaska District Environmental Resources Section, Hydraulics & Hydrology Section, and Civil Works Branch (Table 40).

Table 40. Preparers of the Environmental Assessment.

Name	Title
Kelly Eldridge	Archaeologist
Chris Hoffman	Biologist
John Olson	Planner
Lauren Oliver	Hydraulic Engineer
David Williams	Project Manger
Andria Werning	Economist
Michael Rouse	Chief of Environmental Resources
Erin Stockdale	Chief of Planning



## 11.0 CONCLUSIONS AND RECOMMENDATIONS

No NED Plan was identified during this study. The Tentatively Selected Plan was identified based on CE/ICA and MCDA analyses. The CE/ICA, MCDA, and NED (although the BCR was not greater than 1) were all in agreement that Alternative 2 resulted in the most benefits and was the best buy plan. In view of the analysis presented, it is recommended that Alternative 2 be approved as Recommended Plan.

The Alaska District recommends that the selected navigation improvements plan for Akutan, Alaska be constructed generally in accordance with the Tentatively Selected Plan herein, and with such modifications thereof as in the discretion of the Director of Civil Works may be advisable at an estimated project first cost with contingency of \$56,926,000.

Federal implementation of the recommended project would be subject to the NFS agreeing to enter into a written Project Partnership Agreement (PPA), as required by Section 221 of Public Law 91-611, as amended, to provide local cooperation satisfactory to the Secretary of the Army. Entering into the PPA will ensure compliance with Federal laws and policies, including but not limited to:

*a. Provide the non-Federal share of construction costs, as further specified below:*

*1) Provide, during design, 10 percent of the costs of design for the general navigation features of the project in accordance with the terms of the design agreement for the project;*

*2) Provide, during construction, 25 percent of the costs of the general navigation facilities allocated to that portion of the project with a channel depth in excess of 20 feet but not in excess of 50 feet; and 50 percent of the costs of the general navigation facilities allocated to that portion of the project with a channel depth in excess of 50 feet;*

*b. Provide all lands, easements, and rights-of-way, including those required for relocations and dredged material placement facilities, acquire or compel the removal of obstructions, and perform or ensure the performance of all relocations, including utility relocations, as determined by the Federal government to be necessary for the construction, operation, and maintenance of the general navigation features;*

*c. Pay, with interest over a period not to exceed 30 years following completion of construction of the general navigation features, an additional amount equal to 10 percent of the construction costs of the general navigation features less the amount of credit afforded by the Federal government for the value of the real property interests and relocations, including utility relocations, provided by the non-Federal sponsor for the general navigation features, except for the value of the real property*

*interests and relocations provided for mitigation, which is included in the construction costs of the general navigation features;*

*d. Ensure that the local service facilities are constructed, operated, and maintained at no cost to the Federal government, and that all applicable licenses and permits necessary for construction, operation, and maintenance of such work are obtained;*

*e. Give the Federal government a right to enter, at reasonable times and in a reasonable manner, upon the real property interests that the non-Federal sponsor owns or controls for the purpose of operating and maintaining the project;*

*f. Hold and save the Federal government free from all damages arising from design, construction, operation and maintenance of the project, except for damages due to the fault or negligence of the Federal government or its contractors;*

*g. Perform, or ensure performance of, any investigations for hazardous, toxic, and radioactive wastes (HTRW) that are determined necessary to identify the existence and extent of any HTRW regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. 9601-9675, and any other applicable law, that may exist in, on, or under real property interests that the Federal government determines to be necessary for construction, operation and maintenance of the general navigation features;*

*h. Agree, as between the Federal government and the non-Federal sponsor, to be solely responsible for the performance and costs of cleanup and response of any HTRW regulated under applicable law that are located in, on, or under real property interests required for construction, operation, and maintenance of the project, including the costs of any studies and investigations necessary to determine an appropriate response to the contamination, without reimbursement or credit by the Federal government;*

*i. Perform the non-Federal sponsor's responsibilities in a manner that will not cause HTRW liability to arise under applicable law to the maximum extent practicable; and*

*j. Comply with the applicable provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, Public Law 91-646, as amended, (42 U.S.C. 4630 and 4655) and the Uniform Regulations contained in 49 C.F.R Part 24, in acquiring real property interests necessary for construction, operation, and maintenance of the project including those necessary for relocations, and placement area improvements; and inform all affected persons of applicable benefits, policies, and procedures in connection with said act.*

The recommendations for implementation of navigation improvements for Akutan, Alaska reflect the policies governing formulation of individual projects and the information available at this time. They do not necessarily reflect the program and budgeting priorities inherent in the local and State programs or the formulation of a national civil works water resources program. Consequently, the recommendations may be changed at higher review levels of the executive branch outside Alaska before they are used to support funding.

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JEFFREY S PALAZZINI  
COL, EN  
Commanding

Date

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**EVALUATION UNDER  
SECTION 404(b)(1) CLEAN WATER ACT 40 CFR PART 230**

Akutan Harbor Navigational Improvements  
Akutan, Alaska

## **1. PROJECT DESCRIPTION**

The project intends to create a protected moorage for a ferry vessel that will transport people and cargo between the community of Akutan and its airfield on Akun Island. The recommended plan (Alternative 2) includes construction of a harbor in Surf Bay consisting of a 450-foot-long rubble-mound breakwater; a 120-foot by 120-foot mooring basin; and a -13-foot MLLW deep entrance channel. Also included in the project are a mooring basin and dolphins, pile-supported dock, a small pad for parking and freight loading/unloading, and a road connecting the pad to an area near the Surf Bay Inn.

### **A. Authority**

Section 203 of the Water Resources Development Act (WRDA) of 2000, as amended, provides authority for the U.S. Army Corps of Engineers (USACE) in cooperation with Indian tribes and heads of other federal agencies to study and determine the feasibility of carrying out projects that will substantially benefit Indian tribes. Section 2006 of WRDA 2007 as amended provides for project justification to be pursued for Remote and Subsistence Harbors if certain criteria are met and sufficient NED benefits for project justification are not identified. The Remote and Subsistence Harbors authority specifically states that in conducting a study of harbor and navigation improvements, the Secretary may recommend a project without demonstrating that the improvements are justified solely by NED benefits if the Secretary determines that the improvements meet specific criteria detailed in the authority

### **B. General Description of Dredged or Fill Material**

The primary discharges to waters of the U.S. would be:

- a. Placement of quarry-sourced rock construction material (C-rock, B-rock, and armor stone) for the construction of the breakwater; and
- b. Placement of terrestrial fill (70,000 to 115,000 cubic yards of coarse sand and gravel) for a temporary construction and drilling/blasting pad.

The rocky, shallow shoreline and high-energy wave environment at the project site may not allow barge-based dredging equipment to access the project area. Because of this, the USACE anticipates that a temporary construction pad of terrestrial fill (70,000 to



115,000 cubic yards of sand and gravel from nearby sources on Akun) would be placed over the project area to allow land-based equipment to reach and dredge the proposed entrance channel and basin. The temporary fill would also help reduce noise and debris impacts from any subsurface blasting. Both the dredged seabed material and the temporary fill would be removed and placed for future beneficial use at a prepared upland stockpile site within the developed airport area on Akun Island.

### **C. Descriptions of the Proposed Discharge Sites**

The placement site for the breakwater and temporary construction fill would be the rocky shoreline of Surf Bay, characterized by a high-energy wave environment, wave-eroded volcanic rock, accompanied by small, narrow beaches of coarse sand and gravel.

### **D. Descriptions of Discharge Methods**

Rock for the breakwaters would be placed by an excavator located on a barge or other floating platform, or from land by an excavator. The temporary construction pad would be placed using front-end loaders and other standard land-based construction equipment.

## **2. FACTUAL DETERMINATIONS**

### **A. Physical Substrate Determinations**

The rock breakwaters would create a high-relief rocky substrate very similar to the natural rocky spurs extending into Surf Bay.

### **B. Water Circulation, Fluctuations, and Salinity Determinations**

The proposed breakwater would reduce wave energy within and near the area it encloses, which will cause localized changes to water circulation along the beach. No freshwater streams enter the area enclosed by the breakwater, so no noticeable effects on salinity are anticipated. The temporary construction fill would be removed entirely upon dredging the basin and entrance channel, and so will have no lasting effect on water circulation, fluctuations, or salinity.

### **C. Suspended Particulate/Turbidity Determinations**

The dredged is expected to consist of coarse sands, gravels, and rock fragments, with little in the way of silt-sized particles.

The dredging is expected to be performed with a mechanical clamshell dredge or excavator operated from a crane stationed on a barge and depositing the dredged

material into dump trucks for transportation to the upland storage site. A hydraulic ripping attachment to an excavator may be necessary to remove consolidated sediment or weathered bedrock within the dredging prism. In mechanical dredging, the sediment becomes suspended into the water by:

- a. the impact of the dredge with the seafloor,
- b. the fallback of sediment as the dredge is raised to the surface, and
- c. dewatering of the sediment as it is placed on the dump truck.

Placement of rock for the breakwater and constructed uplands is not expected to significantly increase turbidity in the project area, as the substrate contains little in the way of fine particles to be disturbed. Rock and fill material would contain residual fines that may become suspended in the water column and contribute minimally to turbidity. The energetic wave environment and exposure of Surf Bay to tides and currents would rapidly dissipate any suspended sediments.

#### **D. Contaminant Determinations**

The project footprint is on and offshore of an unimproved beach, currently adjacent to an area used to launch small watercraft and land cargo barges. The Alaska Department of Environmental Conservation (ADEC) Contaminated Sites Program has no records of contaminant releases at or near Surf Beach on Akun Island.

The Clean Water Act Section 404(b)(1) guidelines state, "Dredged or filled material is most likely to be free from chemical, biological, or other pollutants where is composed primarily of sand, gravel, or other naturally occurring inert material. Dredged material so composed is generally found in areas of high current or wave energy..." (40 CFR 230.60). As described in previous sections, the material to be dredged consists of a few feet of wave-driven coarse sand and gravel, on top of much denser formations of weathered bedrock. The USACE determines that the material to be dredged meets the above description from 40 CFR 230.60 and is highly unlikely to have received and retained contaminants.

#### **E. Aquatic Ecosystems and Organism Determinations**

Construction of the breakwater would augment the existing high-relief rock substrate provided by the natural rocky spurs. The new breakwater would be expected to recruit similar communities of marine algae and invertebrates.

#### **F. Proposed Discharge Site Determinations**

The dredged material would consist of coarse sand, gravel, and crushed rock, with

minimal fines. This material would be placed at an existing upland site for subsequent use as needed on Akun Island. Runoff from dewatering would be managed by a Storm Water Pollution Prevention Plan (SWPPP) obtained by the construction contractor.

### **G. Determination of Cumulative, Secondary Effects on the Aquatic Ecosystem**

Construction of the breakwater would augment the existing high-relief rock substrate provided by the natural rocky spurs. The new breakwater would be expected to recruit similar communities of marine algae and invertebrates. The constructed project would be expected to be used by boats currently launching from Akutan and would bring in larger boats (e.g., the fish tender) that currently do not visit Akun. This diversion of the current fleet would create a potentially higher risk of small fuel or other pollutant releases at Akun.

## **3. FINDINGS OF COMPLIANCE OR NON-COMPLIANCE WITH THE RESTRICTIONS ON DISCHARGE**

### **A. Adaptation of Section 404 (b)(1) Guidelines to this Evaluation**

The proposed project complies with the requirements outlined in the Environmental Protection Agency's Guidelines for Specification of Disposal Sites for Dredged or Fill Material.

### **B. Evaluation of Availability of Practicable Alternatives to the Proposed Discharge Site Which Would Have Less Adverse Impact on the Aquatic Ecosystem**

The placement of material into the aquatic environment for the construction of the rubble mound breakwater is integral to the project purpose of creating a safe maneuvering and mooring area for vessels; no alternative is identified. Material placed to create a temporary construction pad would be removed at the end of the project construction, resulting in no net discharge. The temporary pad will also serve to reduce the impacts of construction blasting on the aquatic environment.

### **C. Compliance with Applicable State Water Quality Standards**

The proposed project will not lead to exceedances of applicable State of Alaska water quality standards.

### **D. Compliance with Applicable Toxic Effluent Standards or Prohibition under Section 307 of the Clean Water Act**

No toxic effluents that would affect water quality parameters are associated with the proposed project. Therefore, the project complies with toxic effluent standards of

Section 307 of the Clean Water Act.

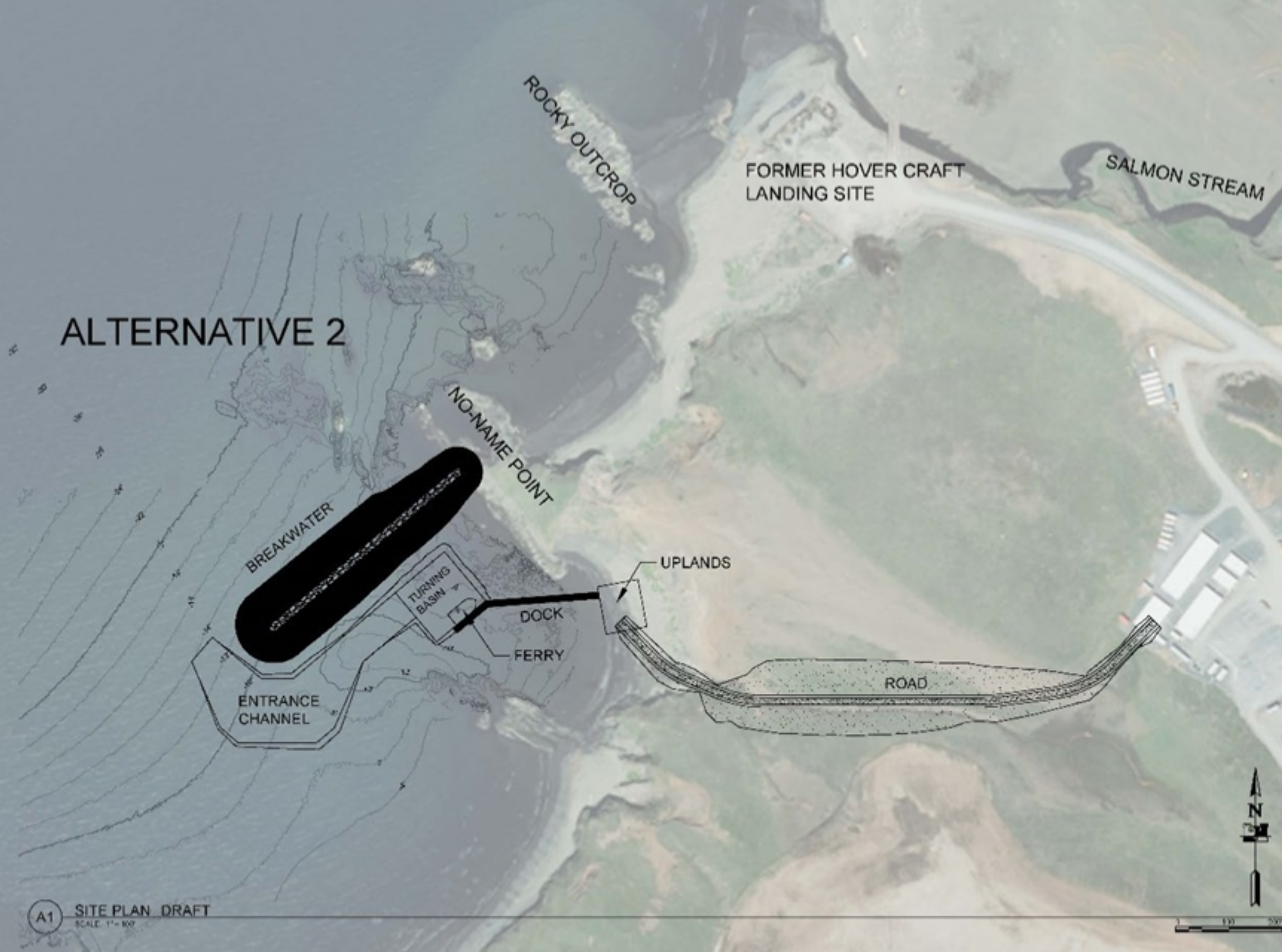
**E. Compliance with Endangered Species Act of 1973**

The USACE has determined that some Endangered Species Act (ESA) listed marine mammal species may be adversely affected by this project and will initiate formal consultation with the National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service (USFWS) when sufficient project detail has been developed to support a comprehensive analysis of impacts (expected to be in the Pre-construction Engineering and Design Phase). Potential adverse effects on listed species are anticipated to result from blasting at the project site, and not from the discharges of material into the aquatic environment.

**F. Evaluation of the Extent of Degradation of the Waters of the United States**

There are no municipal or private water supplies in the area that could be negatively affected by the proposed project. Commercial interests would benefit from port improvements. There would be no significant adverse impacts on plankton, fish, shellfish, wildlife, and/or special aquatic sites.

# ALTERNATIVE 2



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# Akutan Tribal Partnership Navigation Improvements Feasibility Study Appendix C: Economics Akun, Alaska



Photo Credit: Department of Commerce, Community and Economic Development; Division of Community and Regional Affairs' Community Photo Library



**U.S. Army Corps  
of Engineers**  
Alaska District

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## 1.0 OVERVIEW

### 1.1. Executive Summary

This appendix presents the economic analysis of three structural alternatives for providing navigation improvements for the village of Akutan at Akun, Alaska. The alternatives are evaluated using the four accounts established in the Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies: National Economic Development (NED), Regional Economic Development (RED), Environmental Quality (EQ), and Other Social Effects (OSE).

Consistent with the authority of Section 2006 of the Water Resources Development Act of 2007 (WRDA 2007) – Remote and Subsistence Harbors, as amended, a NED analysis was performed, which demonstrated that none of the alternatives had a benefit-cost ratio (BCR) greater than 1.0. Since there is no NED plan, Cost Effectiveness and Incremental Cost Analysis (CE/ICA) is used to support plan selection. The non-monetary metric used in the CE/ICA is Access Opportunity for the design vessel. The metric refers to the improved opportunity each alternative offers the community to reliably access the transportation network.

While Access Capability is the optimal metric representing the opportunity for safe access at each alternative plan, the metric alone inadvertently assumes all alternatives provide a uniform level of benefits for that access. By this assumption, the nuances of benefits and their contribution to community viability are not fully captured within that metric. Multiple Criteria Decision Analysis (MCDA) is used to account for these OSE benefit intricacies. A focus group was conducted in October 2022 with key community members to inform the MCDA. The final criteria (which were subsequently weighted and scored to reflect the various alternatives impacts on long term community viability) included Health and Safety; Subsistence; Delivery of Essential Non-Medical Goods; Cultural Identity (non-food gathering traditional practices); Income opportunities; Community Growth and Expansion; Transportation Mode Preferences; Noise Pollution; and Local Vessel Access.

The results of the NED analysis, the CE/ICA analysis, and the MCDA analysis are summarized in Table 1. Note that Alternative 2 has the highest average annual net NED benefits, but the BCR is below 1.0. The FWOP condition and Alternative 2 are identified as Best Buy plans through the CE/ICA, meaning these alternatives provide the greatest increase in output for the least increase in cost. The subsequent MCDA analysis ranks Alternative 1 and 2 highest in the OSE criteria that describe long-term community viability concerns, with Alternative 2 becoming the highest ranked plan with the CE/ICA variables of cost and Access Opportunity included. These analyses inform plan selection as detailed in the main report of the Draft Integrated Feasibility Report and Draft Environmental Assessment.

Table 1. Four Accounts Evaluation Summary

Alternative	Benefit-Cost Ratio	AAEQ Net NED Benefits	EQ	RED	OSE (CE/ICA results, MCDA Rank)	
					Best Buy	NA
No Action (FWOP)	0.00	\$ 0	Neutral	Neutral	Best Buy	NA
Alt 1	0.12 to 0.28	\$(2,946,000) - \$(2,395,000)	Neutral	Increased employment and income for the region and state	Non-Cost Effective	2
Alt 2	0.18 to 0.43	\$(1,802,000) - \$(1,251,000)	Neutral	Increased employment and income for the region and state	Best Buy	1
Alt 3	0.17 to 0.41	\$(1,905,000) - \$(1,354,000)	Neutral	Increased employment and income for the region and state	Non-Cost Effective	3

## 1.2. Purpose and Scope

The purpose of this economic analysis is to evaluate whether the proposed navigation improvements at Akun, Alaska, are economically justified.

## 1.3. General Methodology

This section describes the methods used to conduct the economic analysis of the proposed navigation improvements at Akun. The study was conducted, and the report prepared in accordance with goals and procedures for water resources planning as contained in Engineer Regulation 1105-2-100, Planning Guidance Notebook, specifically in the appendices on economic and social considerations, along with the project authorization, as well as recent Economic Guidance Memoranda (EGMs) issued by Headquarters USACE. Alternatives were examined for their feasibility, considering engineering, economic, environmental, and other criteria.

Compilation of this report included a literature review of published information on the history, present status, and prospects for transportation at Akun. Primary data collection was conducted through focus groups, personal interviews, and other follow-up research and data gathering.

National Economic Development (NED) benefits are defined as the change in value of goods and services that accrue to the Nation as a whole as a result of constructing a project. National Economic Development costs are defined as the total economic costs of constructing and maintaining the project. The average annual economic benefits of the project are compared to the average annual economic costs to provide an estimated benefit-cost ratio (BCR). A project with a BCR greater than 1.0 is considered NED justified. The project with the highest net NED benefits is the NED plan.

The regional economic development (RED) account displays changes in the distribution of regional economic activity (for example, income and employment). The other social effects (OSE) account displays plan effects on social aspects such as community resilience, public health, life safety, displacement, energy conservation, and similar effects. The environmental quality (EQ) account measures positive and negative benefits to the environment and is analyzed consistent with current guidance.

All prices listed in this appendix are reported in current dollars. All costs were calculated using Fiscal Year (FY) 2023 (October 2022) price levels and then converted to Average Annual Equivalent values using the FY 2023 Federal discount rate of 2.50 percent, assuming a 50-year period of analysis.

NED benefits are assessed for the alternatives identified in the Project Alternatives section and follow the methodology for small boat harbor navigation analysis described in the Planning Guidance Notebook and other relevant USACE regulations and policy guidance. For Akutan, the main NED benefit equals the difference between without- and with-project costs associated with transportation (transportation cost savings).

The study utilizes Section 203 of the Water Resources Development Act (WRDA) of 2000 as amended which provides authority for the United States Army Corps of Engineers (USACE) in cooperation with Indian tribes and heads of other federal agencies to study and determine the feasibility of carrying out projects that will substantially benefit Indian tribes.

This study utilizes the project justification allowed under Section 2006 of WRDA 2007 – Remote and Subsistence Harbors, as modified by Section 2104 of the Water Resources Reform and Development Act of 2014 (WRRDA 2014) further modified by Section 1105 of WRDA 2016. The authority specifies that in the absence of a NED Plan and/or the selection of a plan other than the NED Plan is based in part or whole on non-monetary units (such as Environmental Quality and Other Social Effects accounts), then the selection will be supported by a Cost Effectiveness and Incremental Cost Analysis (CE/ICA) consistent with ecosystem restoration evaluation procedures. The with- and without-project evaluation framework is similar for both the NED analysis and CE/ICA and is described in subsequent sections as appropriate.

## **2.0 INTRODUCTION**

### **2.1. Project Location and Description**

The history of Akutan can be traced to the middle of the 18<sup>th</sup> century and extended in time to remote prehistory based on archeological data.<sup>1</sup> The Chulka area on Akun

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<sup>1</sup> The History and Ethnohistory of the Aleutians East Borough. Lydia T Black. 1999

Island was occupied from at least 780 AD until 1878, when the people moved to Akutan where there was a trading post (Holland 1982).

Akutan began in 1878 as a fur storage and trading port for the Western Fur & Trading Company. The company's agent established a commercial cod fishing and processing business that quickly attracted nearby Unangan to the community. A Russian Orthodox church and a school were built in 1878 and the Alexander Nevsky Chapel was built in 1918 to replace the original structure. The Pacific Whaling Company built a whale processing station across the bay from Akutan in 1912. It was the only whaling station in the Aleutians and operated until 1939. After the Japanese attacked Unalaska in June 1942, the U.S. government evacuated Akutan residents to the Ketchikan area. The village was re-established in 1944, although many villagers chose not to return. This exposure to the outside world brought many changes to the traditional lifestyle and attitudes of the community. The city was incorporated in 1979<sup>2</sup>.

The community of Akutan is located on Akutan Island, in the eastern Aleutian Island archipelago, 35 miles east of the city of Unalaska/Dutch Harbor and approximately 766 air miles southwest of Anchorage (Figure 1). It is situated on the eastern side of Akutan Island, on a flat piece of land with the steep slope of a mountain rising behind the village, confining the community to a small area. Akutan is situated on the north shore of Akutan Harbor, a large deep body of water protected by the island's active volcano (also called "Akutan") that blocks much of the prevailing easterly winds of the Aleutian Islands. The bay accommodates large vessels, including floating processors, and large container and cargo ships that service both Akutan as well as the large adjacent shore-based seafood processing facility, Trident Seafoods (Trident).

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<sup>2</sup> Alaska Department of Commerce, Community, and Economic Development Division of Community and Regional Affairs

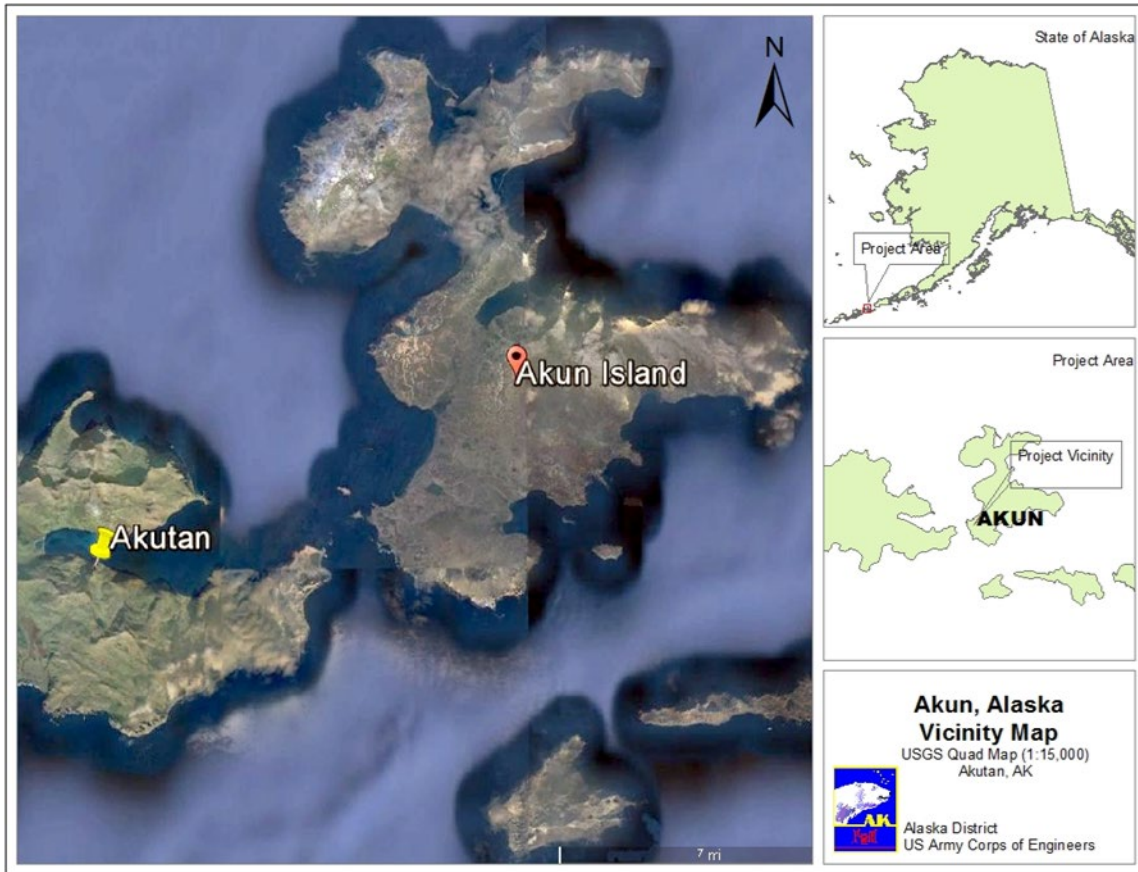


Figure 1. Akun Navigation Improvements Project Location and Vicinity

Akun Island lies immediately northeast of Akutan Island and has a land area of 64 square miles. Akutan falls within the southwest maritime climate zone, characterized by persistently overcast skies, high winds, and frequent cyclonic storms. High winds and storms are frequent in the winter, and fog is common in the summer.

Akutan is part of the Aleutians East Borough. Present in the community are 2 local governments, the Native Village of Akutan (a federally recognized tribe with an active tribal council) and the City of Akutan (incorporated as a second-class city in 1979). The City of Akutan represents populations that reside in the village of Akutan, with about 113 year-round residents, most of whom are of Alaska Native ancestry, as well as transient Trident employees who reside in dormitories at the facility. The Akutan Corporation, with its headquarters in the community, is an Alaska Native village corporation organized under the provisions of the Alaska Native Claims Settlement Act (ANCSA). Both historically and currently there has been little interaction between the two populations, and the populations were further self-isolating during the COVID pandemic. Minimal village residents are employed by Trident.



The islands of Akutan and Akun are in a maritime climate zone, characterized by mild winters and cool summers. According to NOAA, mean temperatures range from 22 to 55 °F (-5 to 13 °C) and precipitation averages 28 inches per year.

The islands and adjacent waters are resource-rich with various species of fish and marine mammals, productive intertidal reefs, and bird rookeries. While they are not indigenous, feral cattle and red foxes are present.

## **2.2. Problems and Opportunities**

Akutan is only accessible by boat or amphibious aircraft. In 2012, an airport was opened on Akun Island to provide a link between inhabitants of the village of Akutan and mainland Alaska. Initially, the Aleutians East Borough used a hovercraft to transport passengers between Akutan and Akun. However, operation costs of the hovercraft exceeded \$4 million annually and it was minimally effective due to wave threshold limitations. The hovercraft was discontinued in February 2014. The Borough currently utilizes helicopter transport, which costs approximately \$2.3 million annually. The Borough believes that transport via a conventional marine vessel would be much less financially burdensome, but there are currently no marine docking facilities on Akun Island.

## **2.3. Infrastructure**

### **2.3.1. Marine Facilities**

Trident Seafoods, one of the largest fish processing plants in Alaska, is located about one-quarter of a mile down the beach from the village and includes several commercial docks for fishing vessels.

The City has a 100' public dock that can accommodate most freighters and fishing vessels, as well as the state ferry Tustumena. A small skiff moorage area is also located near the community.



Figure 2. Aerial View of Akutan Ferry Dock

The City's boat harbor, located at the head of the bay, provides moorage for 58 vessels ranging up to 165 feet in length, serves as a place of refuge for disabled craft, and adds an important link in the community's transportation network<sup>3</sup>.

Akutan Harbor Amenities include:

- Moorage up to 58 vessels for up to 165'.
- Channel entrance: 100' wide and 18.5' deep.
- Two armored stone breakwater sections.
- Approximately 12-acre basin.
- Float A is 560' x 16' with a 6' x 60' gangway which accommodates up to 10 vessels, up to 165' in length & 2 vessels up to 125' in length.
- Harbor electrification project is complete.
- Construction of new harbormaster house is fully operational, with electricity and water/septic systems in place.

<sup>3</sup> <https://akutanharbor.com/>



Figure 3. Aerial View of the Akutan Harbor, Head of the Bay



Figure 4. Akutan Harbor dock, Head of the Bay

Source: City of Akutan, <https://akutanharbor.com>

The Akutan harbor is an economic asset to the community and the Borough. The Borough believes it's necessary to complete the float system in its entirety so the harbor can function as intended, meet the needs of the community, and realize its full potential

as a key harbor for the fishing industry and the North Pacific fishing fleets. The Akutan Harbor Float System Project consists of installing a new timber main float (Float B) with a pile-supported access trestle and aluminum gangway; and installing new timber finger floats on the existing Float A, which will cost approximately \$15.1 million. The Borough is pursuing grant funds for completion of this project. See Figure 5.

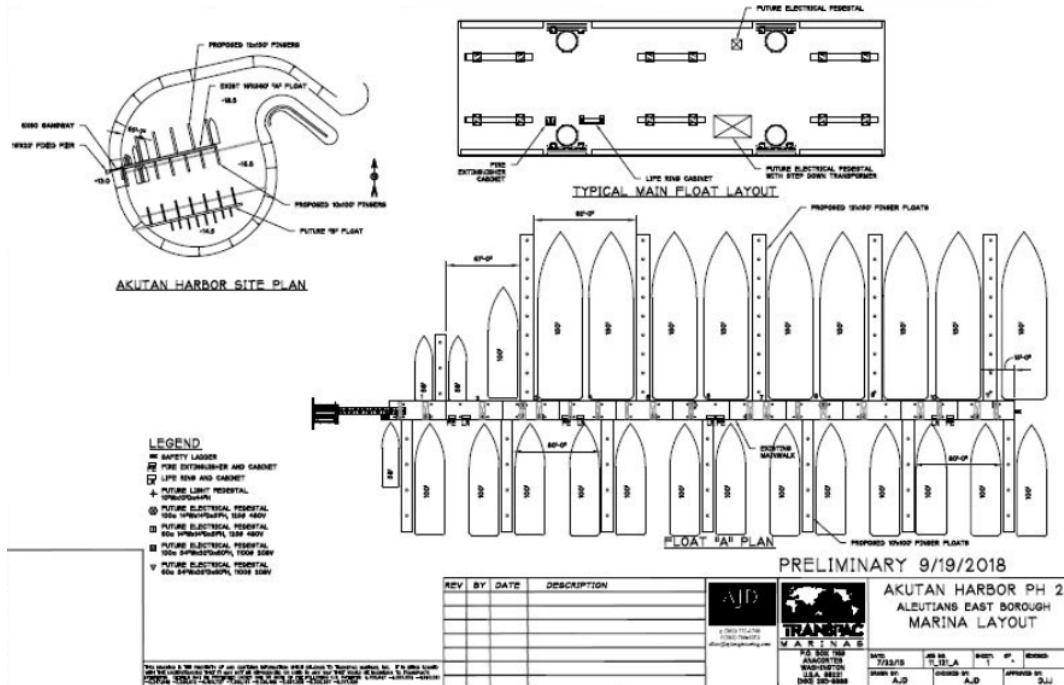


Figure 5. Akutan Harbor Dock Upgrade Plans, Head of the Bay  
Source: Aleutians East Borough, <https://www.aleutianseast.org/project/akutan-floating-dock-project/>

### 2.3.2. Airport

Prior to 2012, Akutan had only been accessible by boat and amphibious aircraft. The land based Akutan Airport was opened in September 2012 on the neighboring Akun Island, and services Akutan via a helicopter. Daily scheduled air service is provided by fixed wing aircraft from nearby Dutch Harbor/Unalaska and is subsidized by the Essential Air Service. Additional information on transportation utilizing the airport can be found in Section 5.1.2.



Figure 6. Akun Island and Airport Location

### **2.3.3. Public Services and Utilities**

Boardwalks connect the homes and facilities for foot and ATV traffic. Except for a one-mile-long road that leads from the village to Trident, there are no roads in Akutan. Akutan village has a limited number of community facilities and organizations including the city, tribal, and village corporation offices, a local store, the historic St. Alexander Nevsky Russian Orthodox Church, a K-12 state school, the Anesia Kudrin Memorial Tribal Health Care Clinic, a jail, and a locally owned bar (Akutan Roadhouse Bar). The Akutan Corporation rents apartments to visitors in the Bayview Plaza Hotel and the Salmonberry House.

## **3.0 SOCIOECONOMICS**

### **3.1. Demographic Profiles**

The population of Akutan in 2020 was 1,589 individuals; with the population divided between year-round residents and transient fish processing workers who live in bunkhouses on the Trident Seafoods campus. Those residing in the village of Akutan totaled less than 8 percent of the overall inhabitants of the island in the year 2020.

Table 2. Akutan Population by Residence Type, Census Years 1990 through 2020

Census Year	Group Quarters* Population	Akutan Population	Total Population
1990	501	88	589
2000	638	75	713
2010	937	90	1,027
2020	1,476	113	1,589

Source: State of Alaska, Division of Community and Regional Affairs and Department of Labor and Workforce Research and Analysis Section, along with ADF&G Technical Paper 371.

Note: \*The population identified as living in “group quarters” in the dataset are those workers employed by, and living on, the Trident Seafoods campus.

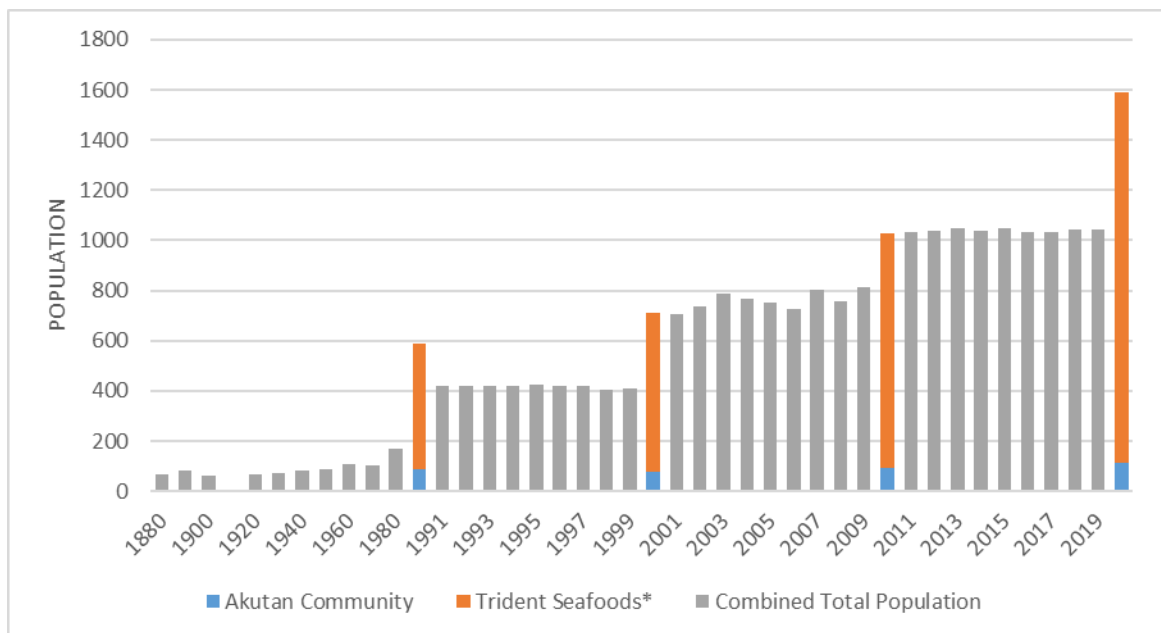


Figure 7: Historical Akutan Village vs Trident Populations, 1880 through 2020

Source: State of Alaska, Division of Community and Regional Affairs and Department of Labor and Workforce Research and Analysis Section, along with ADF&G Technical Paper 371.

Note: \*The population identified as living in “group quarters” in the dataset are those workers employed by, and living on, the Trident Seafoods campus.

According to Alaska Department of Fish and Game subsistence household surveys for 2009, an estimated 88.9 percent of the 40 households of the Village of Akutan had an Alaska Native as head of household, with the total estimated population of Alaska Natives being 81.1 percent.<sup>4</sup> Census records reflect a smaller distribution of Alaska Native in the overall population due to the migratory workers of Trident Seafoods being included within the estimates (see Table 3.) While many population statistics

<sup>4</sup> ADFG Technical Paper 371: Subsistence Harvest and Uses in Three Bering Sea Communities 2008 Akutan Emmonak and Tokian

encompass both populations, there is little interaction between the two populations on the island.

Table 3. Overall Akutan Island Population by Race, 2020

<b>Race</b>	<b>Percent of Total Island Population (includes both Akutan residents and Trident Seafood workers)</b>
American Indian or AK Native	12.15%
Asian	37.98%
Black or African American	15.47%
Native Hawaiian or Pacific Islander	2.81%
White	21.36%
Other Race	8.57%
Two or More Races	1.66%

Source: Division of Community and Regional Affairs, Community Resource Hub

The large numbers of individuals living in group quarters in Akutan, and the Aleutian Islands in general, make populations very difficult to forecast. Business decisions by Trident Seafoods and shifts in seafood harvesting could greatly impact long-term population in Akutan, decreasing the accuracy of any attempt to forecast the population at the Akutan Island level. The population projection for the Aleutians East Borough from 2025 through 2050 shows a slight decline, primarily due to forecasted birth and death rates, rather than migration. However, historical populations of Akutan have shown population increases, largely due to the processing workers. Given the uncertainty inherent in any population projection for Akutan, for purposes of this analysis the population is held static from 2021 levels and does not include Trident Seafoods workers (as the study is formulated to meet the needs of the community of Akutan).

Table 4. Aleutians East Borough Population Projections, 2025 through 2050

<b>Forecast Year</b>	<b>Population Projection</b>	<b>Estimated Population Change from Prior Period</b>	<b>Growth Rate</b>
2025	3,362		
2030	3,353	-9	-0.1%
2035	3,343	-10	-0.1%
2040	3,333	-10	-0.1%
2045	3,308	-25	-0.2%
2050	3,292	-16	-0.1%

Source: Alaska Department of Labor and Workforce Development, Research and Analysis Section

### **3.2. Employment and Income**

As with many statistics for the village of Akutan, employment and income data for the permanent residents specifically (rather than as a combined total with the transient processing workers) is largely unavailable. Data that is available combines both the resident and non-resident populations and is highly variable depending upon the season.

According to the 2021 American Community Survey, the median household income in Akutan is \$32,750, with 22.4 percent of people living below the federal poverty line. This compares to the state of Alaska with \$77,845 and 10.5 percent of people, respectively.<sup>5</sup>

Per capita income in Akutan is \$34,515, compared to the US at \$38,332. However, when observing just the American Indian and Alaska Native segment of the population (which is the best available proxy for eliminating the transient workers from the dataset), the per capita income for Akutan drops to \$15,316. This low per-capita income becomes even more of a hinderance when the high cost of living that is associated with remote Alaska is considered.

As a result of the Trident processing plant, a key industry in Akutan is commercial fishing and many of those employed are transient workers housed in a group setting on the Trident Seafoods campus. The American Community Survey (2021) reports employment by industry for Akutan, which highlights the impact of manufacturing (seafood processing) in the community at 76.1 percent of employment. Public Administration is the second largest employer at 17.1 percent of the total. It is worth noting that these statistics include both the resident and transient populations, and data for the resident population alone is unavailable.

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<sup>5</sup> U.S. Census Bureau (2021). American Community Survey 5-year estimates. Retrieved from Census Reporter Profile page for Akutan, AK <<https://data.census.gov/profile?g=1600000US0201090>>



Table 5. Akutan Employment by Industry

<b>Occupation</b>	<b>Estimated Number</b>
Civilian employed population 16 years and over	585
Agriculture, forestry, fishing and hunting, and mining	0
Construction	3
Manufacturing	445
Wholesale trade	0
Retail trade	9
Transportation and warehousing, and utilities	0
Information	0
Finance and insurance, and real estate and rental and leasing	0
Professional, scientific, and management, and administrative and	6
Educational services, and health care and social assistance	11
Arts, entertainment, and recreation, and accommodation and food	11
Other services, except public administration	0
Public administration	100
<b>Total</b>	<b>585</b>

Source: American Community Survey, 2021

Business licenses for the community consist of the Akutan Corporation, the Bayview Plaza Hotel, the McGlashan Store, the Salmonberry Inn, the Surf Inn, and the A.C. Apartments<sup>6</sup>.

### 3.2.1. Commercial Fishing

Commercial fishing has played an important role in the local economy of Akutan, although in terms of participation and, to a lesser degree, of income, the role has diminished over time. Commercial fishing jobs (this does not include processing jobs) represented 19% of all jobs held by Akutan residents in 2008, compared to 37% of all jobs in 1990. Of all Akutan households, 33% in 2008 had at least 1 member employed in commercial fishing, compared to 73% of households in 1990. For Akutan households with any cash employment, 35% in 2008 and 75% in 1990 had members involved in commercial fishing. Of all Akutan adults who had employment in 2008, 30% worked in commercial fishing jobs (about 18 individuals), compared to 44% (44 individuals) in 1990. Commercial fishing jobs produced 26% of the earned income and 22% of all income in Akutan in 2008; in 1990, 35% of earned income and 29% of all income derived from commercial fishing.<sup>7</sup>

Akutan participates in the Community Development Quota (CDQ) Program. The program was established with four goals: “(i) to provide eligible western Alaska villages with the opportunity to participate and invest in fisheries in the Bering Sea and Aleutian

<sup>6</sup> State of Alaska DCRA Information Portal for Akutan

<sup>7</sup> Fall, J.A., C.L. Brown, N.M. Braem, L. Hutchinson-Scarborough, D. S. Koster, T.M. Krieg, and A.R. Brenner. 2012. Subsistence harvests and uses in three Bering Sea communities, 2008: Akutan, Emmonak, and Togiak. Alaska Department of Fish and Game, Division of Subsistence Technical Paper No. 371, Anchorage.

Islands Management Area; (ii) to support economic development in western Alaska; (iii) to alleviate poverty and provide economic and social benefits for residents of western Alaska; and (iv) to achieve sustainable and diversified local economies in western Alaska.” (NOAA)

As shown in Table 6, commercial fishery participation and earnings of the residents of Akutan has varied from year to year. Most commercial fishing activity and earnings by Akutan residents is centralized on the halibut longline fishery, with lesser contributions from miscellaneous saltwater finfish, sablefish, herring, and crab. According to interviews with community members, commercial catch is currently sold to Trident.

Table 6. Commercial Fishing Permit & Activity by Year for Akutan Residents

Year	Number of Permits Issued	Number of Permits Fished	Pounds Landed	Estimated Gross Earnings
2021	2	2	X	X
2020	2	0	0	\$ -
2019	7	7	22,626	\$ 74,067
2018	9	5	20,022	\$ 69,189
2017	10	5	21,421	\$ 91,681
2016	10	8	2,024,364	\$ 612,708
2015	11	7	2,330,914	\$ 607,680
2014	13	9	22,261	\$ 86,480
2013	11	7	29,662	\$ 67,689
2012	13	10	88,105	\$ 177,497
2011	13	9	106,231	\$ 247,212
2010	12	10	313,112	\$ 229,137
2009	13	8	250,103	\$ 151,547
2008	12	8	175,451	\$ 276,698
2007	9	9	67,623	\$ 210,914
2006	11	8	X	X
2005	12	7	X	X
2004	12	9	51,444	\$ 140,071
2003	13	6	45,047	\$ 119,942
2002	9	6	29,450	\$ 35,177
2001	13	5	54,331	\$ 114,688
2000	10	6	37,053	\$ 114,009

Source: State of Alaska Commercial Fisheries Entry Commission.

Note: “X” indicates a fishery that is masked by the CFEC due to confidentiality. Confidentiality requirements involve masking when 3 or less people or permits are involved in the fishery and, if needed, masking the same fishery for another area in order to show statewide and year totals.

Commercial fishing vessels homeported in Akutan range in size from 16’ to 42’ in length, with the most common length being 18’, for the years 2000-2023. There was a minimum of 1 vessel, and a maximum of 7 vessels, permitted per year during that period.

Table 7. Commercial Fishing Vessels Homeported in Akutan by Length for the Years 2000 through 2023

	Vessel Length			
	>=20 feet	>20-25 feet	>25-30 feet	>30 feet
Vessel Count	7	2	1	3

Source: State of Alaska Commercial Fisheries Entry Commission.

### 3.2.2. Trident Seafoods

The crab and fish processing industry developed in Akutan in the late 1940's with the use of numerous floating processors operating in Akutan Bay. By the 1980's, Trident constructed a shore-based processing plant which largely replaced the floating seafood processors. At the time of writing, it was the largest seafood processing facility as well as one of North America's busiest fishing and shipping ports. This facility processes Bering Sea-caught seafood products year-round and during peak periods employs and houses more than 1,400 people, with imported labor from around the world.<sup>8</sup>

The Trident Akutan plant sustains a year-round, multi-species frozen seafood operation capable of processing more than 3 million pounds of raw fish per day. The Trident Seafood plant in Akutan primarily processes Walleye Pollock and large volumes of Pacific cod, king and snow Crab, halibut and sablefish.

In addition to traditional boxed and frozen seafood items, the plant is also capable of producing surimi and can recover large volumes of secondary products including pollock roe, fishmeal, and fish oil.

### 3.3. Tax Information

Taxes are levied on raw seafood that is sold/transferred. The Aleutians East Borough collects a 2 percent sales tax (per Section 60.20.030 of Borough Code, "The tax due under this chapter shall be computed by multiplying the sale price by two percent. The sale price includes all forms of consideration given for the raw fish. The tax due on a transaction shall be rounded to the nearest whole cent with fractions of one-half cent and more rounded upward.") Fish tax for the Aleutians East Borough are collected from Akutan, Cold Bay, False Pass, King Cove, and Sand Point and therefore include sources other than Trident Seafoods in Akutan.

The City of Akutan collects a 1.5 percent fish tax.

Neither the city nor the borough reported collecting any taxes beyond the fish tax (no sales tax, bed tax, alcohol tax, or property taxes).

<sup>8</sup> Trident Seafoods. <http://www.tridentseafoods.com>. (Accessed 2022).

Table 8. Annual Fish Tax Collected, Akutan and Aleutians East Borough, 2012-2022

	<b>Akutan (1.5%)</b>	<b>Aleutian East Borough (2%)</b>
2012	\$ 1,222,653	\$ 4,789,215
2013	\$ 1,663,209	\$ 4,121,050
2014	\$ 1,715,128	\$ 4,073,343
2015	\$ 1,816,530	\$ 3,998,104
2016	\$ 2,098,763	\$ 4,268,884
2017	\$ 3,337,019	\$ 4,714,403
2018	\$ 3,337,019	\$ 4,951,066
2019	\$ 1,985,328	\$ 4,530,157
2020	\$ 1,985,328	\$ 4,714,015
2021	\$ 1,688,184	\$ 4,057,971
2022	\$ 2,061,636	\$ 6,054,977

Source: State of Alaska Department of Commerce, Community, and Economic Development, Division of Community and Regional Affairs, Alaska Taxable Reports

### 3.4. School Enrollment

The Akutan School operates as part of Aleutians East Borough Schools and serves grades pre-kindergarten (Pre-K) through 12. Total enrollment from 2001 through 2022 ranged from 7 to 20 students, with an overall increasing trend during this period (Department of Education and Early Childhood Development).

Schools in Alaska are required to have a minimum of 10 students to receive state funding. The stable enrollment shown in Figure 8 points to a positive sign that the school at present does not face an immediate threat of closing. However, school enrollment does not necessarily fulfill all K-12 education requirements. For Alaska Natives, one's education extends to learning from community members and elders. This learning is often knowledge shared by participating together in subsistence activities connected to specific places.

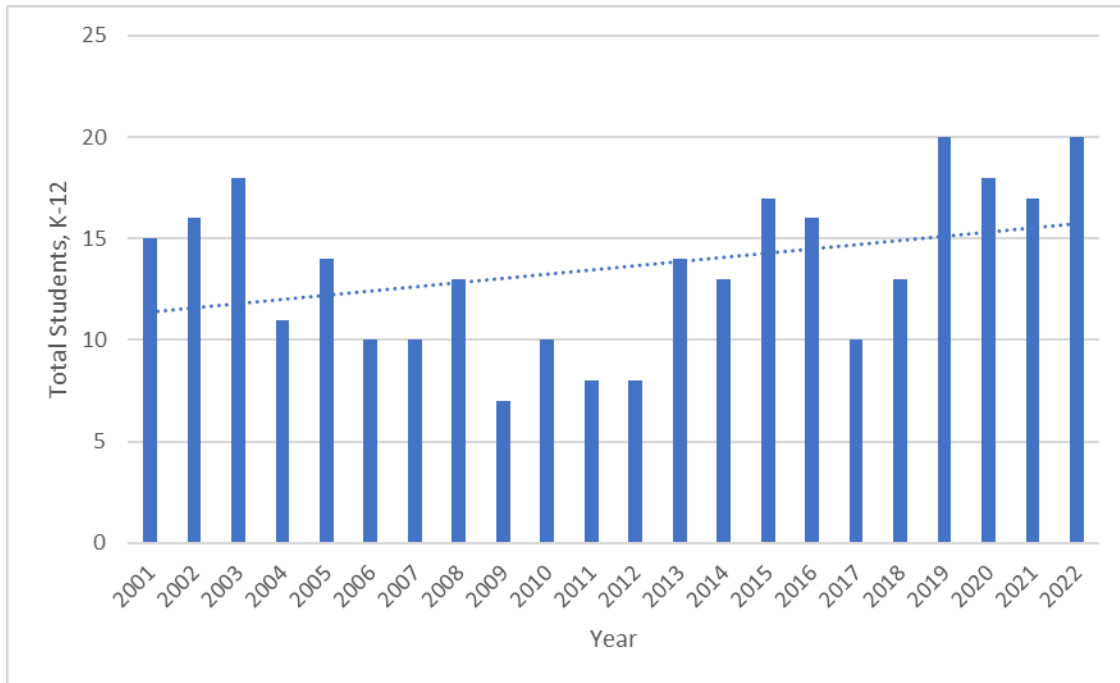


Figure 8: Akutan School Enrollment, 2001-2022  
 Source: Alaska Department of Education and Early Development

### 3.5. Subsistence Activities

Subsistence is the non-commercial, traditional, and customary harvest of renewable resources for food, clothing, fuel, transportation, construction, arts, crafts, sharing, and customary trade. These uses of wild resources are of important cultural and economic value in rural Alaska.

As is common in many Alaskan communities, subsistence activities in Akutan are an important source of food and cultural tradition. The community of Akutan is a mixed subsistence-cash economy. The term “mixed economy” has special implications in rural areas of Alaska. In the Alaska-style mixed economy, households typically follow a pattern of activity that combines employment for cash with traditional fishing and hunting. Subsistence gathering contributes to the household food supply and provides building material, fuel, and raw material for tools, clothing, and arts and crafts.

Cash income from employment (most often limited to seasonal income) is used to obtain modern technology to support the gathering of wild resources. Use of modern equipment, such as snowmobiles, power boats, nets, rifles, and traps, enables individuals to continue to participate successfully in traditional activities across greater distances.

Additional information on subsistence activities is provided in Section 5.3.2.

## **4.0 MARINE RESOURCE ASSESSMENT**

The purpose of a marine resource assessment in an economic analysis is to examine the health of a marine resource stock, potential shifts of marine resources during the study period, and if the baseline marine resources could support any expected potential increases in harvest under a FWP condition. In the case of Akutan, commercial fishing is not anticipated as a primary benefit category under FWP conditions. A minimal marine resource assessment is still presented here to provide background information concerning the primary commercially harvested species in the area and their management.

### **4.1. Commercial Fisheries Overview**

The North Pacific Fishery Management Council (NPFMC) manages the Nation's groundfish and crab fisheries in US Exclusive Economic Zone of Alaska (see Figure 9) through the development of Fisheries Management Plans (FMP). FMPs implement the Council's Groundfish Management Policy "to apply judicious and responsible fisheries management practices, based on sound scientific research and analysis, proactively rather than re-actively, to ensure the sustainability of fishery resources and associated ecosystems for the benefit of future, as well as current generations."

The Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area includes all species of groundfish (pollock, cod, flatfish, sablefish, rockfish, etc.) fished commercially by vessels using trawl, longline, pot, and jig gear.

The NPFMC must coordinate its management of fisheries with state, national, and international agencies, in accordance with the applicable laws and treaties that govern the fisheries.

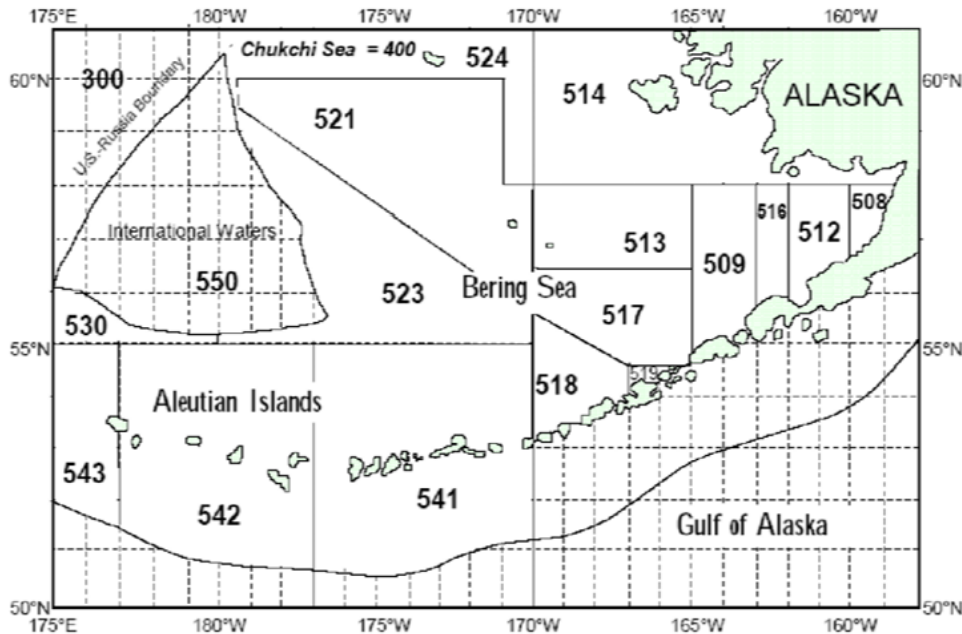


Figure 9: Bering Sea/Aleutian Islands Statistical and Reporting Areas

Source: North Pacific Fishery Management Council, Stock Assessment and Fishery Evaluation Report for the Groundfish Resources of the Bering Sea/Aleutian Islands Regions

#### 4.2. Historical Catch and Value

The National Oceanic and Atmospheric Administration (NOAA) conducts population assessments of fish and shellfish populations as a tool in fisheries management.

The largest commercial fishery by volume for Akutan is Walleye pollock. According to NOAA's 2020 stock assessment, the Aleutian Islands region pollock stock is healthy. The population level is currently above target and not overfished.

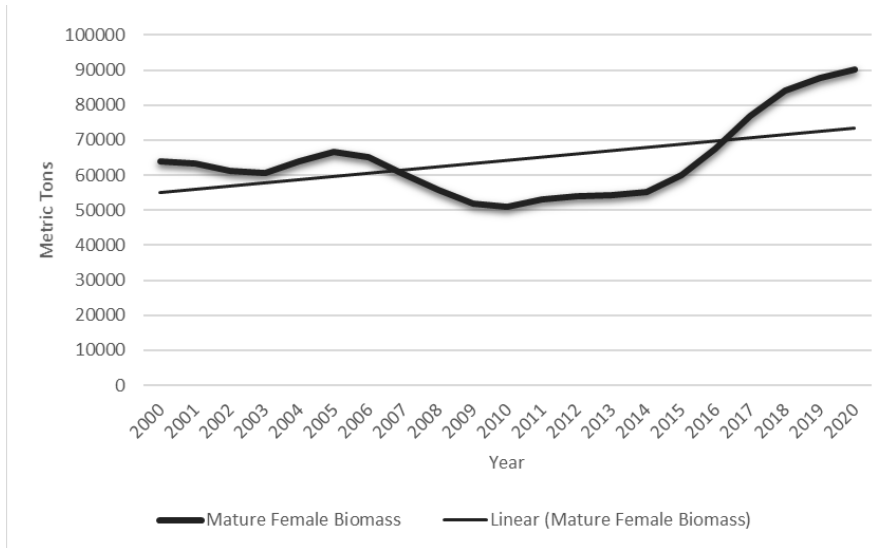


Figure 10: 20-Year Pollock Stock Abundance  
Source: NOAA Fisheries

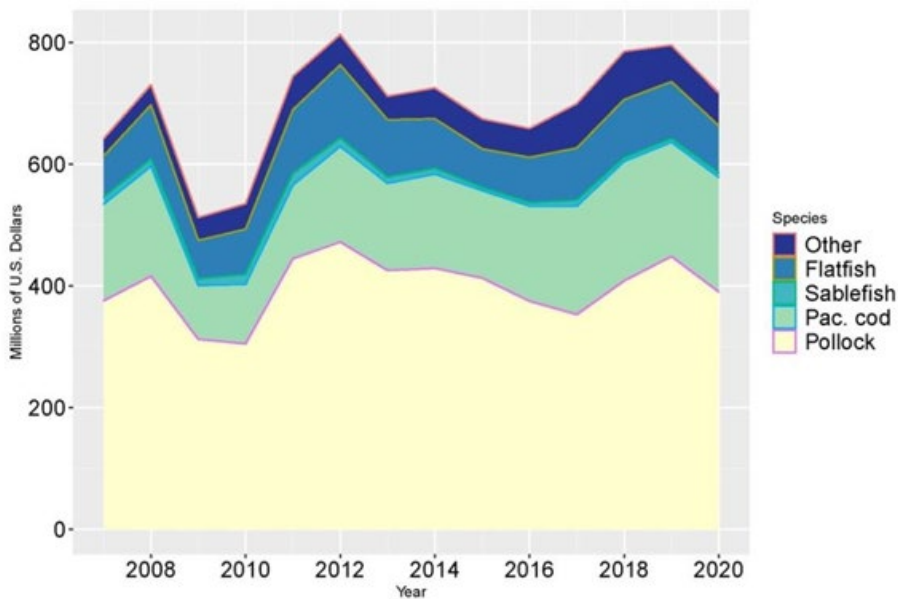


Figure 11: BSAI Groundfish Catch Ex-vessel Value, 2007-2020  
Source: <https://apps-afsc.fisheries.noaa.gov/refm/docs/2021/BSAIntro.pdf>

### 4.3. Commercial Fisheries Outlook

Overall, the status and health of the stocks continues to appear favorable.



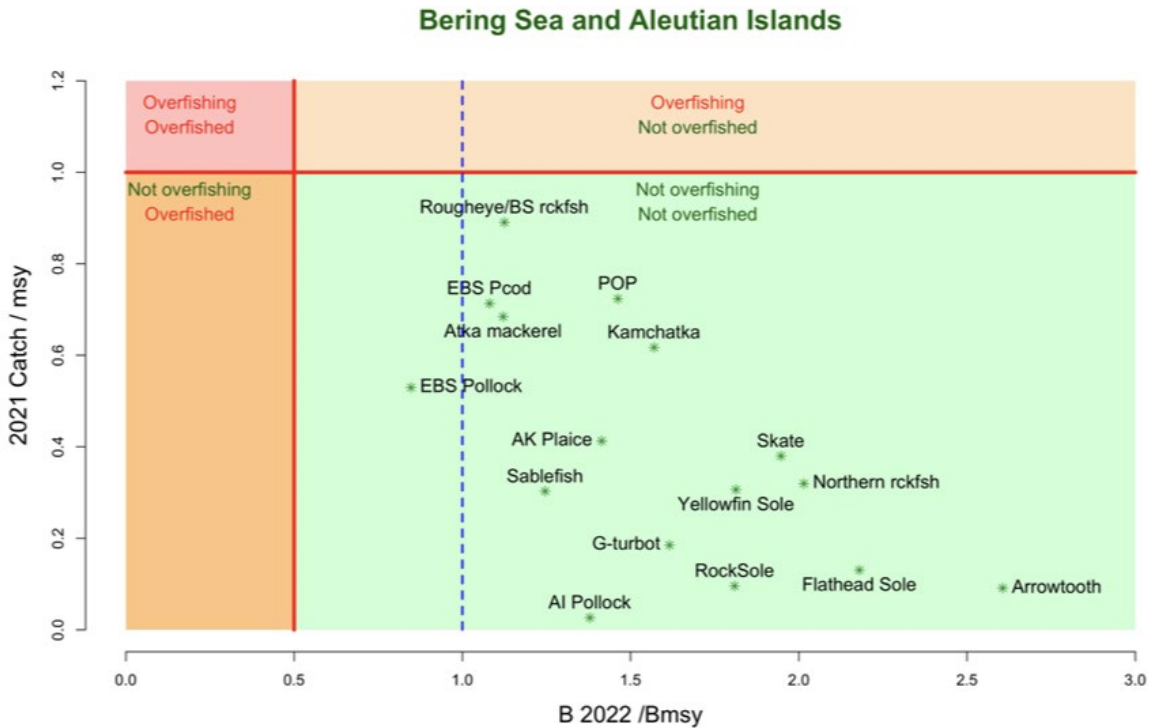


Figure 12: Summary of Bering Sea Stock Status Next Year, Base 2022

Source: Source: North Pacific Fishery Management Council, Stock Assessment and Fishery Evaluation Report for the Groundfish Resources of the Bering Sea/Aleutian Islands Regions

Trident Seafoods in Akutan processes many species, but the primary species by volume and value is pollock from the Bering Sea. The Bering Sea pollock fishery is the largest sustainably certified fishery in the world. It is well managed and has never been closed to fishing. The annual catch limit varies based on abundance but is very stable. A significant decline in the short- or long-term is not anticipated.

## 5.0 EXISTING CONDITIONS

### 5.1. Transportation

The maritime climate in the Aleutians influences all aspects of life. The weather is known to be harsh, and in combination with the remoteness of the region, getting to and from Akutan can be difficult.

#### 5.1.1. Alaska Marine Highway System Ferry

The Alaska Marine Highway System (AMHS) is a ferry service operated by the state of Alaska which provides transportation to coastal communities, particularly those not on the road system. The ferries of the Alaska Marine Highway cover 3,500 miles of coastline and provide service to over 30 communities and is an integral part of Alaska’s highway system, reaching many communities that would otherwise be cut off from the

rest of the state and nation. The AMHS is designed to provide basic transportation services to those remote communities, and vessels are designed to carry both passengers and limited vehicles.

Akutan is serviced by the AMHS Southwest Alaska route, which serves Prince William Sound, the Kenai Peninsula, Kodiak Island, and the Aleutian Islands with the MV Tustumena. The Aleutian chain, including Akutan, does not have scheduled service in the winter due in part to adverse weather conditions. Besides weather, scheduling of ferry service is also heavily dependent on funding levels. According to AMHS Traffic Volume Reports, budget uncertainty resulted in multiple service reductions from 2015 through 2018 which led to subsequent reductions in ridership. As of 2022, once monthly trips through Akutan are scheduled for July through September on the MV Tustumena.



Figure 13: Alaska Marine Highway System, Southwest Route

Source: AMHS Traffic Volume Report, 2019

The MV Tustumena is 296 feet long and 59 feet wide, with a domestic gross tonnage of 2,174 and a service speed of 13.3 knots. This ferry has the shallowest draft of all the AMHS mainline ferries at 14 feet 4.5 inches fully loaded. The MV Tustumena is designed to carry 160 passengers and has a vehicle capacity of 680 linear feet, which is equal to approximately 34 twenty-foot vehicles. There are 6 four-berth and 17 two-berth cabins, as well as 1 wheelchair-accessible cabin. The Tustumena is equipped with a dining room offering sit down food service, observation lounges, a covered heated solarium, a movie lounge, and showers.



Figure 14: MV Tustumena of the Alaska Marine Highway System

Source: AMHS website, <https://dot.alaska.gov/amhs/fleet/tustumena.shtml>

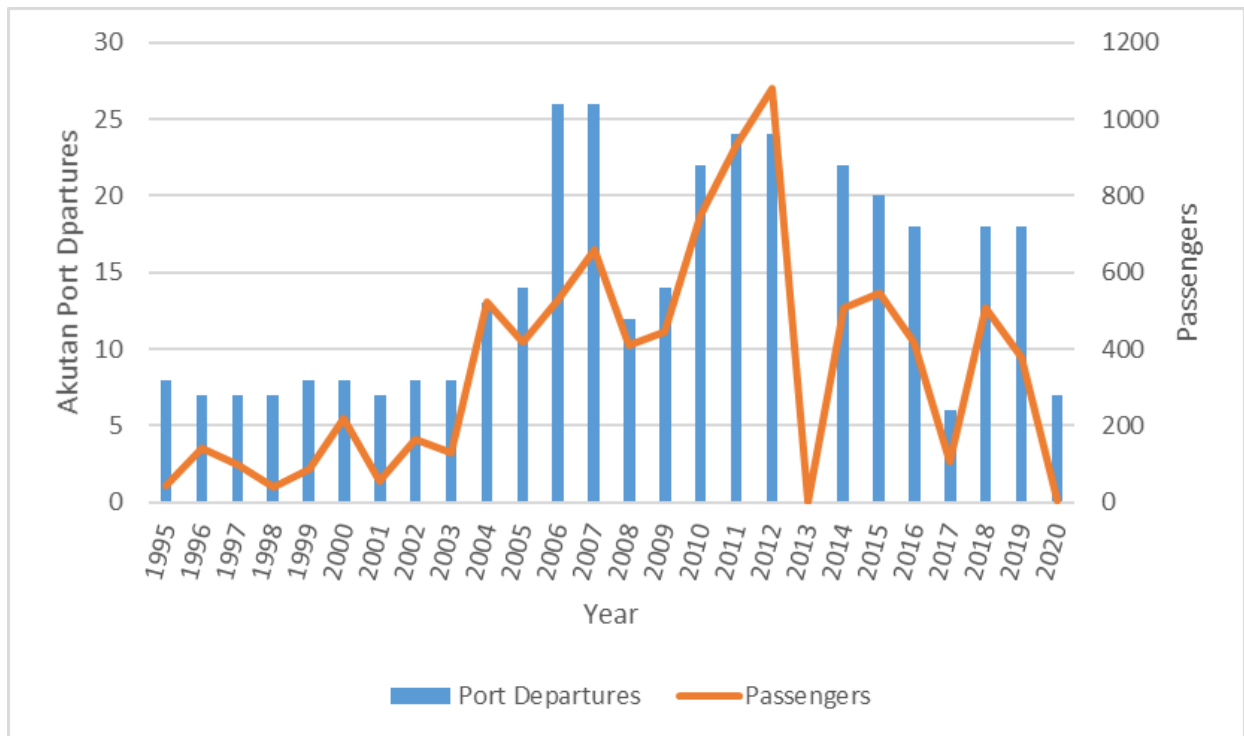


Figure 15. AMHS Akutan Passenger and Port Departures, 1995-2020

Source: 2005-2020 AMHS Traffic Volume Reports

Notes:

-During 2013 service in the Southwest region was severely impacted by delays in the MV Tustumena's annual maintenance project. Limited service to the Aleutian Islands was provided by MV Kennicott, but its moorage requirements exceed what is available in Akutan.

-Passenger counts in 2020 were anomalous due to the COVID-19 pandemic.

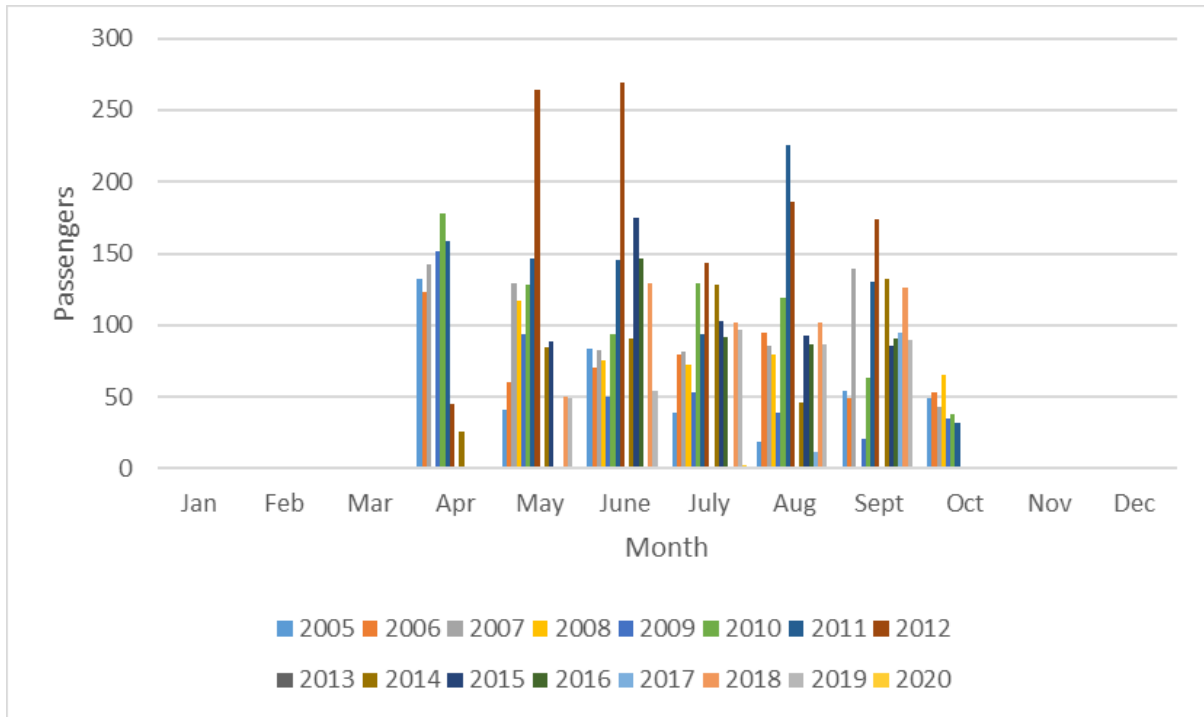


Figure 16. AMHS Akutan Total Monthly Passenger Count, 2005-2020

Source: 2005-2020 AMHS Traffic Volume Reports

Notes:

-During 2013 service in the Southwest region was severely impacted by delays in the MV Tustumena's annual maintenance project. Limited service to the Aleutian Islands was provided by MV Kennicott, but its moorage requirements exceed what is available in Akutan.

-Passenger counts in 2020 were anomalous due to the COVID-19 pandemic.

As evident in Figure 17, over 85 percent of all Akutan AMHS passengers start or end their trip to/from Akutan at Unalaska/Dutch Harbor. Dutch Harbor serves as the regional hub for the Aleutian Islands. Trips on AMHS can last several hours or several days depending upon embarkation and disembarkation ports; the Akutan to Dutch Harbor leg of the journey is estimated to last 3.5 hours.

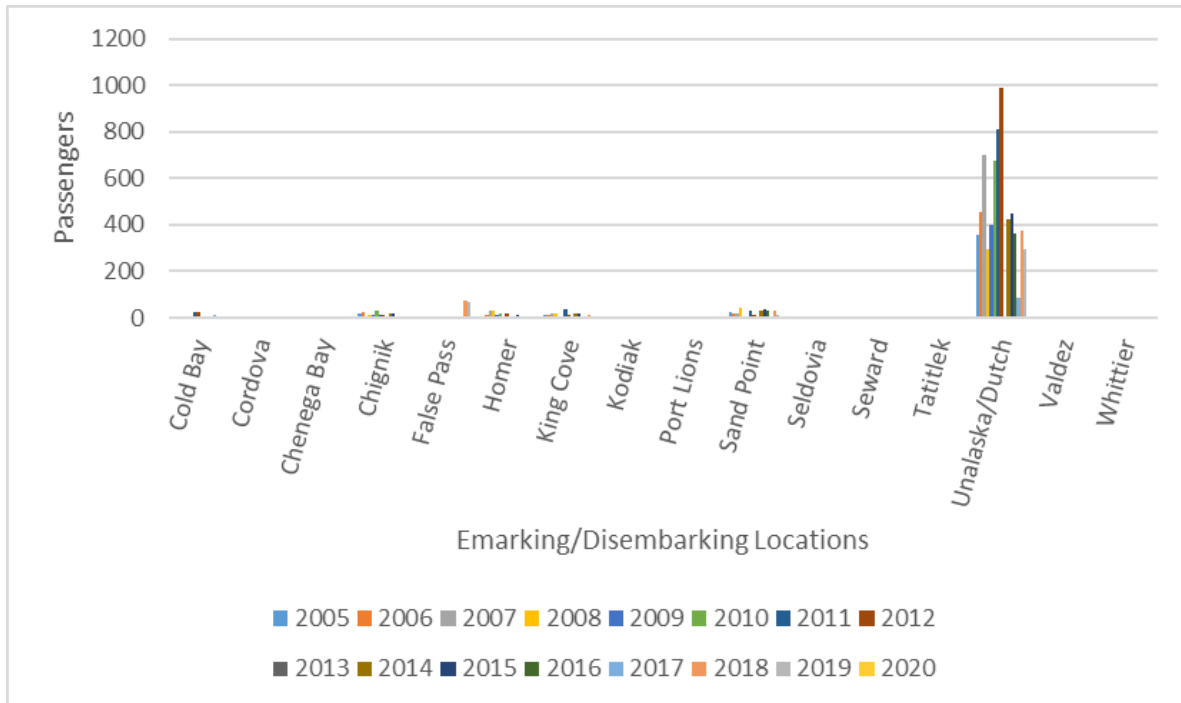


Figure 17. Akutan AMHS Passengers by Embarkation/Disembarkation Port, 2005-2020

Source: 2005-2020 AMHS Traffic Volume Reports

Notes:

During 2013 service in the Southwest region was severely impacted by delays in the MV Tustumena's annual maintenance project. Limited service to the Aleutian Islands was provided by MV Kennicott, but its moorage requirements exceed what is available in Akutan.

Passenger counts in 2020 were anomalous due to the COVID-19 pandemic.

Akutan has utilized the AMHS for limited vehicle transportation to/from the island, with a maximum of 17 vehicle movements in a single year (2010, with 8 vehicles embarking to Akutan and 9 vehicles disembarking). An average of just over 4 vehicle movements per year occur at Akutan, see Figure 18.

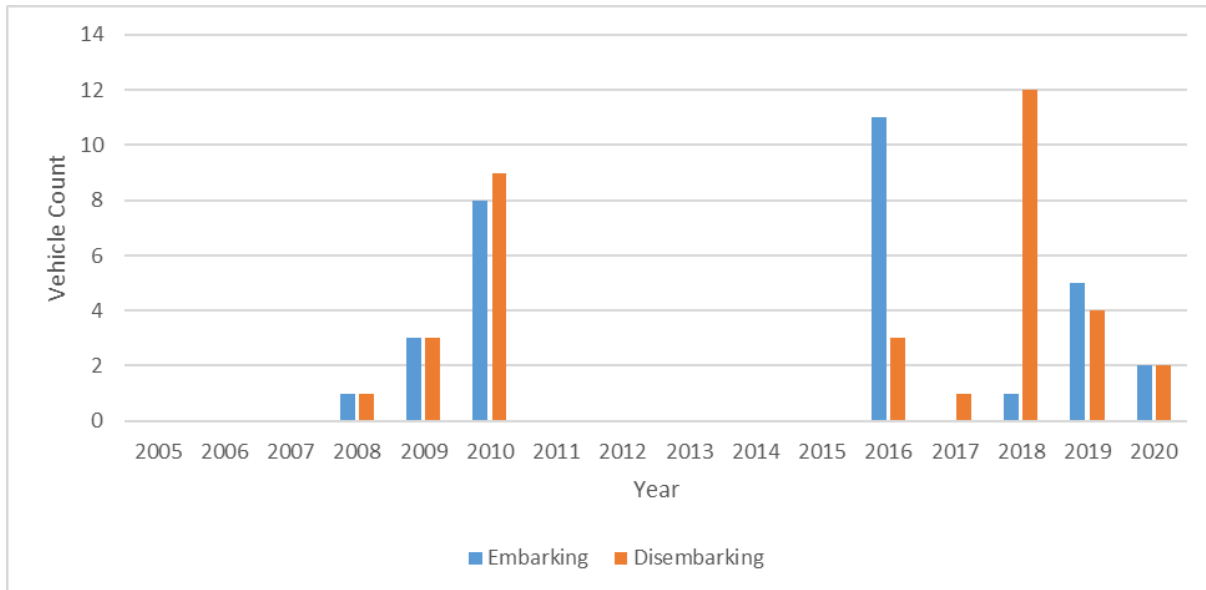


Figure 18. Akutan AMHS Vehicles Shipped, 2005-2020

Source: 2005-2020 AMHS Traffic Volume Reports

Notes:

-During 2013 service in the Southwest region was severely impacted by delays in the MV Tustumena’s annual maintenance project. Limited service to the Aleutian Islands was provided by MV Kennicott, but its moorage requirements exceed what is available in Akutan.

### 5.1.2. Air Transportation

The existing transportation system in Akutan consists of both a helicopter and a fixed-wing aircraft. The helicopter is housed at Akutan Harbor and makes trips back and forth between the community of Akutan and their airport on the island of Akun. The fixed wing is housed in Unalaska Dutch Harbor and makes trips back and forth between Unalaska and the airport on Akun.

Helicopter crew take a skiff from Akutan to the hanger, they then fly the helicopter to Akutan to pick up passengers (coordinating with the fixed-wing) and then fly to Akun to drop off outgoing passengers and pick up incoming passengers and/or freight and fly back to Akutan. Two round trips per day are scheduled. At the end of the day the helicopter returns to the hanger and the crew are transported back to Akutan via skiff. In FWOP conditions, the skiff to and from the hanger will be eliminated since a road to the Akutan Harbor is being constructed.



Figure 19. Akutan Transportation System

#### 5.1.2.1. Essential Air Service

The Airline Deregulation Act (ADA), passed in 1978, gave air carriers almost total freedom to determine which markets to serve domestically and what fares to charge for that service. The Essential Air Service (EAS) program was put into place to guarantee that small communities that were served by certified air carriers before airline deregulation maintained a minimal level of scheduled air service. The United States Department of Transportation is mandated to provide eligible EAS communities with access to the National Air Transportation System.

Under the EAS program, the US Department of Transportation determines the minimum level of service required at each eligible community by specifying a hub through which the community is linked to the national network, a minimum number of round trips and available seats that must be provided to that hub, certain characteristics of the aircraft to be used, and the maximum permissible number of intermediate stops to the hub.

Where necessary, the Department pays a subsidy to a carrier to ensure that the specified level of service is provided. Most eligible points do not require subsidized service but as of April 1, 2009, the Department was subsidizing service at 108 communities in the contiguous 48 states, Hawaii, and Puerto Rico, and 45 in Alaska. Both the fixed wing service between Unalaska and Akun, and the helicopter service between Akun and Akutan are subsidized through this program.

Table 9. Akutan Annual Essential Air Service Subsidies

Approx Year*	Helicopter Annual Contract Subsidy Rate (USD \$)	Fixed-Wing Annual Contract Subsidy Rate (USD \$)
2019	\$ 846,978	\$ 924,959
2020	\$ 874,832	\$ 951,170
2021	\$ 905,439	\$ 1,037,523
2022	\$ 914,240	\$ 1,062,726
2023*	\$ 1,040,113	\$ 1,550,110
2024*	\$ 1,098,078	\$ 1,706,657
2025*	\$ 1,152,195	\$ 1,860,691

Source: US Department of Transportation EAS Status Reports

Note: \*Exact dates of contract period can vary.

2023-2025 annual contract rates are estimated based on EAS proposal DOT-OST-2000-7068 dated October 2022

EAS agreements must be renewed every two years, without any certainty that the agreement will be renewed. Without the funding provided by the EAS, the helicopter would be cost prohibitive and the challenges of the transportation system serving Akutan would become even more extreme. Additional information regarding costs for EAS are included in the following sections.

The EAS agreement includes a schedule of 2 round trip flights per day (morning and afternoon) 6 days per week, with no flights on Sundays.

#### **5.1.2.2. Fixed Wing Service**

Access to the airport on Akun is provided by fixed wing aircraft out of Unalaska-Dutch Harbor, Alaska. These flights are provided under the EAS program and include 12 weekly nonstop round trips between the Akutan Airport located on Akun Island and Unalaska, weather permitting.<sup>9</sup> Flights are scheduled twice daily, six days a week (with no flights on Sundays) but the regular schedule may be altered due to demand or weather on a Beechcraft King Air B-200 or a Piper PA31-350 Navajo Chieftain. They will also adapt their schedule to get passengers/freight moved when there is high demand or when there has been a backlog due to weather closures. In addition to scheduled flights, charter flights are also available.

For the contracted period of April 1, 2021, through March 31, 2023 the Department of Transportation established a subsidy rate of \$1,037,523 for the period from April 1, 2021, through March 31, 2022, and \$1,062,726 for the period from April 1, 2022, through March 31, 2023 for this service provided by the fixed wing aircraft.<sup>10</sup>

Information on delays due to weather and mechanical issues is included in Section 5.1.2.4.

<sup>9</sup> US DOT Oder 2022-10-2 served October 4, 2022, number DOT-OST-2000-7068-0108 attachment 1

<sup>10</sup> US DOT Oder 2022-10-2 served October 4, 2022, number DOT-OST-2000-7068-0108 attachment 1



### 5.1.2.3. Maritime Helicopters

Maritime Helicopters provides flight services between Akutan’s land-based airport on Akun Island to the village of Akutan. Prior to helicopter operations, a hovercraft was utilized to transport passengers back and forth from Akutan to Akun. The Bell 206L4 helicopter is stationed in Akutan and replaced the hovercraft in 2014 as a more reliable and affordable option when compared to the hovercraft (passenger/trip data for the hovercraft service are unavailable).

Cost for the helicopter service is funded through a combination of Essential Air Service grant funds and the Aleutians East Borough (AEB) under two-year contractual agreements. Under this subsidy, the US Department of Transportation agreed to cover 50 percent of the helicopter expenditures between Akutan and Akun.

The DOT established an annual subsidy rate of \$905,439 for the period from April 1, 2021, through March 31, 2022, and \$914,240 for the period from April 1, 2022, through March 31, 2023 for this helicopter service<sup>11</sup>. As part of that agreement, the AEB provides support services to Maritime for operations according to an agreement with the US Department of Transportation. A few of the highlights of the agreement are shown in Table 10.

Table 10. Essential Air Service Responsibilities

<b>Maritime Responsibilities</b>	<b>AEB Responsibilities</b>
Operate the Helicopter to provide Essential Air Service between the community located on Akutan Island the airport located on Akun Island.	The AEB shall provide fuel for the helicopter operation including permitting, owning, and maintaining the remote fuel systems and the fuel dispensing system and billing Maritime for its use.
At Maritime’s discretion, be available to operate the helicopter for other missions (i.e., medevacs).	The AEB owns and maintains the Helicopter hangar at the head of Akutan Bay. The Borough shall lease space to Maritime for usage of the hangar for helicopter operations and shall provide transportation for the Maritime personnel between Akutan and the helicopter hangar located at the head of Akutan Bay for a fee.
Conduct mail transport services between the Akutan Airport and the City of Akutan. Coordination with Grant Aviation and U.S. Postal Service is required.	
Maritime shall be responsible for all costs related to lodging for Maritime Personnel.	The AEB agrees to pay Maritime for helicopter services.
Maritime shall establish the fare schedule and be responsible for ticketing and fare collection.	
Maritime agrees to pay AEB a monthly payment for fuel, transportation, and hangar usage services.	

<sup>11</sup> US DOT Oder 2022-10-2 served October 4, 2022, number DOT-OST-2000-7068-0108 attachment 1

A breakdown of expenses by category for annual helicopter service are presented in Table 11 for the year 2023.

Table 11. 2023 Proposed Annual Essential Air Service Helicopter Contract Rate

<b>Direct Expenses</b>	<b>\$</b>
Pilot Payroll Expenses	250,000
Aircraft Operating Expense	796,500
Aircraft Fuel	189,924
Insurance	79,981
<b>Indirect Expenses</b>	
Akutan Base Indirect Expenses	580,262
Administrative Costs	284,500
Total Operational Costs	2,181,167
5% Profit Margin	109,058
<b>Total Cost</b>	<b>2,290,225</b>
Minus Total Estimated Revenue	210,000
<b>Estimated Annual Subsidy for Service</b>	<b>2,080,225</b>
Estimated DOT Subsidy - 50%	1,040,113
Estimated AEB - 50%	1,040,113

Source: EAS proposal DOT-OST-2000-7068 dated October 2022

Note: Expenses include items such as skiff transportation services for the helicopter crew, hanger usage, fuel, and rent/utilities/supplies for crew. Total Estimated Revenue includes both passenger ticket fees and cargo shipment fees.

Starting in 2012, the Aleutians East Borough committed to providing access between Akutan and the Akun Airport for a period of 20 years which would expire in 2032. At that time, the borough assembly would need to approve an extension if one was desired. The other potential path starting in 2032 would be a shift of the financial burden for the helicopter to the City of Akutan<sup>12</sup>.

Helicopter flights are aligned with the fixed-wing flights, and are scheduled twice daily, six days a week (with no flights on Sundays) year-round.

<sup>12</sup> Information provided during Project Delivery Team meeting on March 8, 2023 by the Aleutians East Borough

Table 12. Scheduled Helicopter Operations

<b>Departure</b>	<b>Arrival</b>	<b>Mon</b>	<b>Tues</b>	<b>Wed</b>	<b>Thurs</b>	<b>Fri</b>	<b>Sat</b>	<b>Sun</b>
Akutan (KQA) 9:50am	Akun (7AK) 10:00am	X		X		X		NA
Akutan (KQA) 11:05am	Akun (7AK) 11:15am		X		X		X	NA
Akutan (KQA) 4:50pm	Akun (7AK) 5:00pm	X	X	X	X	X	X	NA
<b>Departure</b>	<b>Arrival</b>	<b>Mon</b>	<b>Tues</b>	<b>Wed</b>	<b>Thurs</b>	<b>Fri</b>	<b>Sat</b>	<b>Sun</b>
Akun (7AK) 10:35am	Akutan (KQA) 10:45am	X		X		X		NA
Akun (7AK) 11:50am	Akutan (KQA) 12:00pm		X		X		X	NA
Akun (7AK) 5:35pm	Akutan (KQA) 5:45pm	X	X	X	X	X	X	NA

Source: EAS proposal DOT-OST-2000-7068-0112 dated October 2022

Each flight (either going from Akutan to Akun, or from Akun going to Akutan) is counted a trip for tracking purposes in this analysis. These trips include a combination of passenger trips and mail/light freight trips. Passenger trips are scheduled as indicated in Table 12, but additional passenger “catch up” trips are made during good weather windows. Freight and mail can be transported on passenger trips when capacity allows, or additional unscheduled trips may also be made to fully deliver packages. While the schedule presented in Table 12 would indicate 1,248 annual total trips would be attempted (6 days per week x 4 one-way trips per day x 52 weeks per year), the number of attempted trips is typically much higher when the unscheduled “catch up” and mail/freight trips are included. Typically, four flights per day are scheduled but up to 8 flights (four round trips) can occur when the carriers are attempting to catch up when there is high demand following long-term weather closures.

For the years 2019 through 2022, an average of 1,593 successful helicopter trips were made annually. Unfortunately, trip count data prior to 2019 is not available and trips during the tracked period may be reduced due to the COVID-19 pandemic. Trips for 2019 were 1,729 compared to 2020 (which was the lowest year on record) at 1,472 helicopter trips. See Figure 20 for additional trip counts.

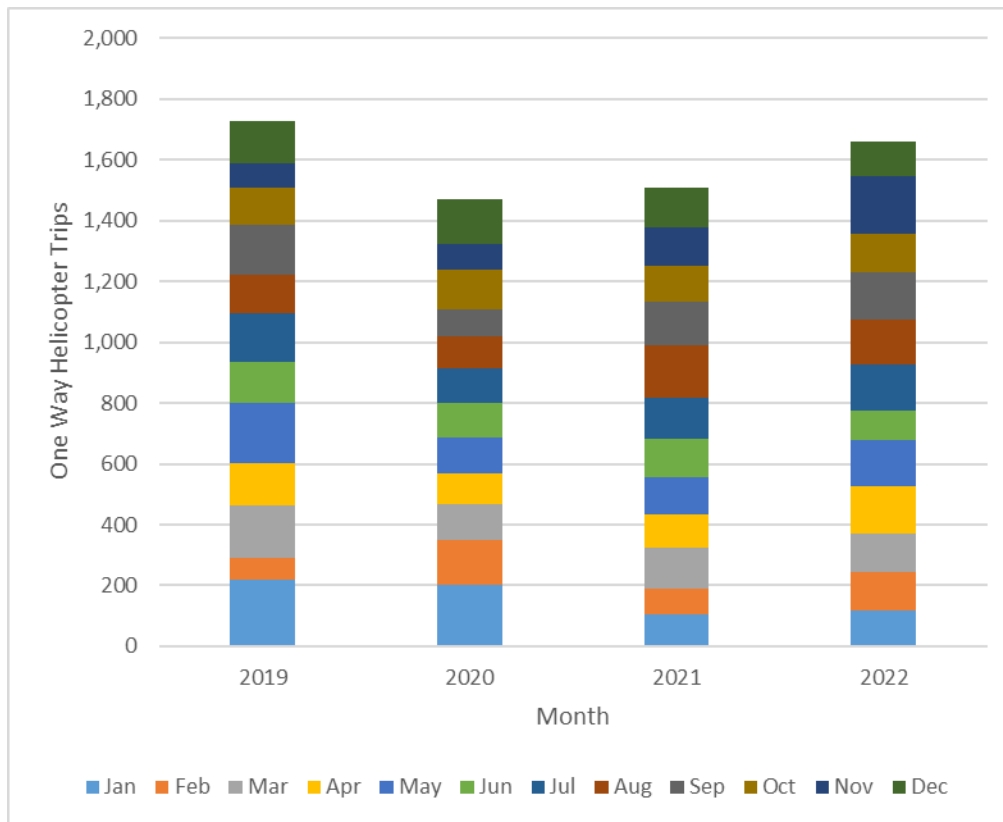


Figure 20. Akutan/Akun Helicopter Trip Segments, 2019-2022

Source: Aleutians East Borough and Maritime Aviation

Notes: Trip counts in 2020-2022 were anomalous due to the COVID-19 pandemic.

The two carriers (helicopter and fixed-wing) coordinate closely prior to each flight. If one carrier must cancel, neither fly. Weather is the primary driver for cancellations of flights in and out of Akun. Weather systems can change quickly in the Aleutian Islands and vary widely between islands. It is not uncommon for the carrier to have to cancel a flight because of bad weather on Akun when the weather at Dutch Harbor is flyable (and the same in reverse). The fixed-wing carrier, therefore, must cancel flights due to weather more often than the helicopter due to the weather variability caused by the distance between Akun and Dutch Harbor.<sup>13</sup> Over the 2020 to 2022 period, of all cancellations for scheduled flights 29 percent were due solely to the fixed-wing carrier, while 17 percent of the cancellations were solely due to the helicopter, and the remaining 54 percent of cancellations were caused by both carriers being unable to fly due to poor weather conditions. Over this period an average of 519 scheduled flights were cancelled annually due to poor weather.

To estimate the total access capability of the helicopter due strictly to weather considerations, the statistics on cancelled vs scheduled trips are utilized. Weather cancellations can be due to a variety of factors ranging from wind to fog conditions. The

<sup>13</sup> Personal communication with Grant Aviation, Vice President of Commercial Operations, January 2023

helicopter has 70 percent weather related access capability (30 percent of the scheduled flights are cancelled when the helicopter could not fly, including both the scheduled trips that the fixed wing could have flown and those when the fixed wing also needed to cancel due to weather.) This estimate looks only at scheduled trips and does not include catch-up trips or unscheduled freight trips (which both occur in prime weather windows and would skew the access capability rate.)

Usually, two to three times a year severe weather will cause flights to be canceled for 5-7 days in a row. Both the fixed-wing and helicopter are limited by wind and visibility issues in these cases. In the summer months, fog around Akun can also be a factor. The longest duration without a flight was 9 days in December 2022 when two separate weather fronts came through back-to-back.

In addition to weather cancellations, mechanical and maintenance issues with the aircraft can also lead to cancellations (although to a much lesser extent than weather). Over the 2020 to 2022 period, an average of 46 scheduled flights were cancelled on an annual basis due to mechanical and maintenance issues. Again, in this case, the majority of cancellations were due to the fixed wing aircraft (77 percent) rather than the helicopter (23 percent).

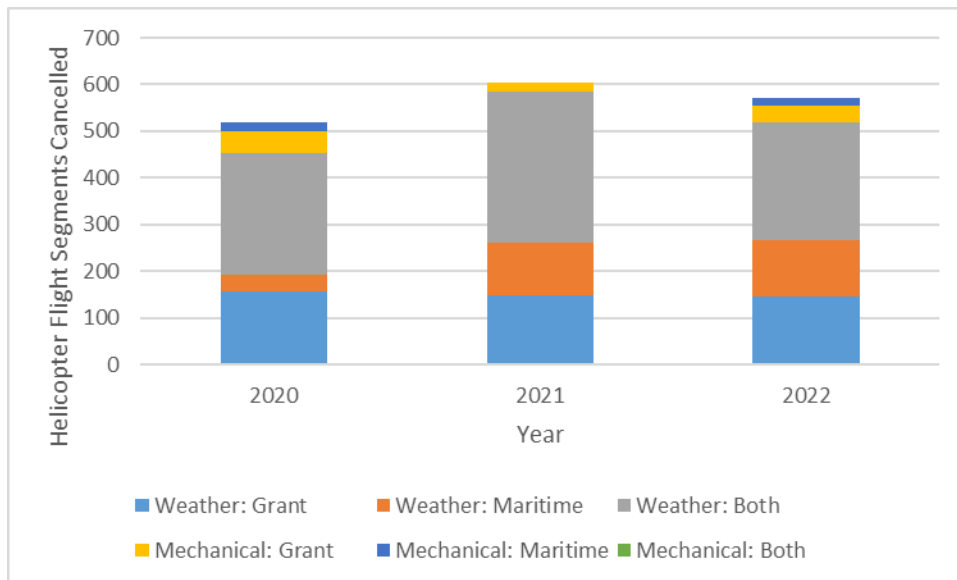


Figure 21. Akutan/Akun Cancelled Helicopter Flight Segments by Cause, 2020-2022

Source: Aleutians East Borough and Maritime Aviation

Notes: Flight segments tabulated as each trip cancelled with a destination of either Akun or Akutan. Information not collected prior to 2020.

The helicopter is stationed at a hangar at the head of Akutan Bay. Each day, the helicopter crew travel via skiff from the community of Akutan to the hangar, pull the helicopter out of the hangar, coordinate flights with the fixed wing carrier and complete

trips to and from Akun. At the end of the day, the helicopter pilots return the helicopter to the hanger and return to the community via skiff. Maritime Aviation estimates that it is a 20-minute skiff ride plus just under a half-mile walk from the dock to the hanger, requiring approximately 35 minutes transportation time for the crew on each trip.

Occasionally, wave conditions are severe enough in Akutan Bay that safe skiff access to the helicopter is not possible. There is no overall impact of this limitation, however, because when the wave height within Akutan Bay is too high for the skiff to access the hanger, the weather conditions are poor enough that fixed wing or helicopter flights are also prohibited. Additionally, in FWOP conditions the road connecting the harbor to the community will be in place and the skiff will no longer be needed. Therefore, impact of wave conditions on skiff operations within Akutan Bay for accessing the hanger is not considered further in this analysis.

The flight time for the helicopter varies depending on the weather and the load but can take anywhere between 6-10 minutes per one-way flight (not including loading and unloading time). Passengers are prioritized over mail and light freight, and numerous helicopter flights must occur to move one fixed-wing plane of mail. The aircraft burns 38 gallons of fuel per hour and can accommodate approximately 4 passengers per trip (weight dependent).<sup>14</sup> As a result of these limitations, it can require multiple helicopter trips to transport one fixed-wing plane load of passengers and their luggage.

Purchasing a one-way helicopter ticket between Akutan and Akun costs \$100 per passenger. In addition to scheduled flights, chartering the aircraft costs \$1750 per hour dry and fuel is billed at cost. In 2022, there were 62 charters for the Akutan-Akun route totaling about 120 round trips. In addition, there were also 10 chartered flights to areas other than Akun in 2022.

Historical helicopter passengers as shown in Figure 22. A slight overall increase in traffic is typical in April and November, which are the beginning and ending of fishing season. Passenger counts starting in 2020 are lower than average because of the COVID-19 pandemic.

For the period from 2014 through 2022, the average annual helicopter passenger count was 2,643, however passenger counts have been significantly reduced in recent years. For the years 2019 through 2022 the helicopter transported an annual average of 1,585 passengers annually (compared to 3,489 passengers for 2014 through 2018). Passenger counts during this period were likely reduced due to the COVID-19 pandemic. See Figure 22 for additional information.

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<sup>14</sup> Personal communication with Maritime Helicopters, Chief Pilot, October 2021 and the Maritime Helicopters website at <https://maritimehelicopters.com/akutan-booking/>

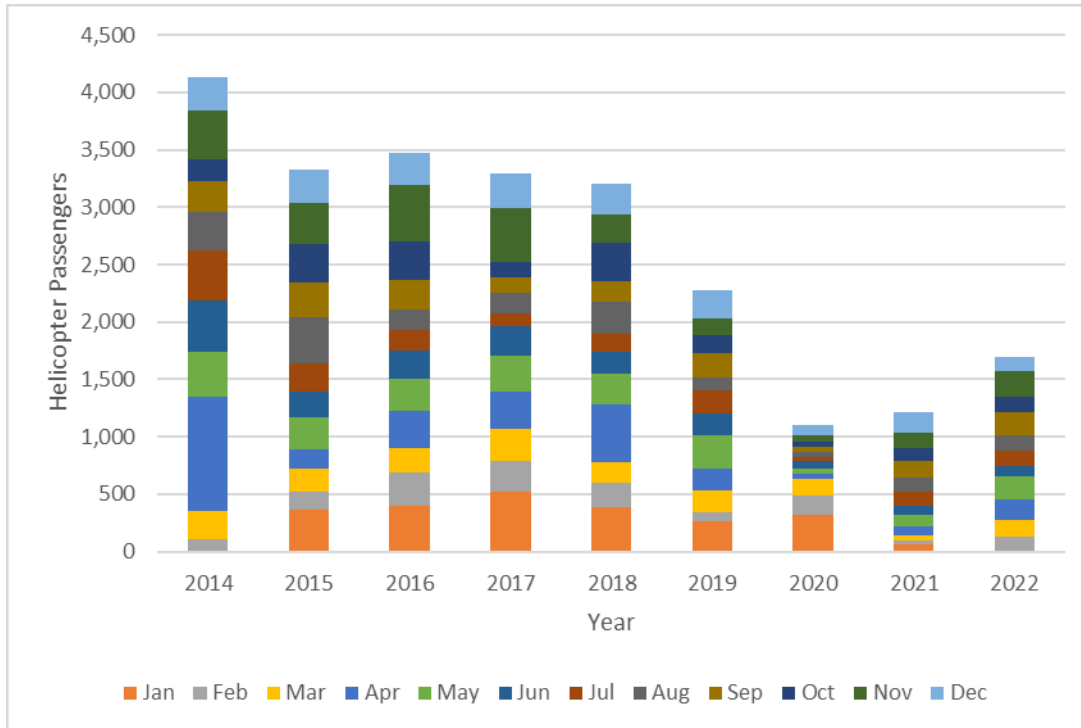


Figure 22. Akutan/Akun Helicopter Passengers by Month, 2014-2022

Source: Aleutians East Borough and Maritime Aviation

Notes: Passenger counts in 2020-2022 were anomalous due to the COVID-19 pandemic.

#### 5.1.2.4. Delays

The helicopter can transport up to four passengers with luggage. Additional trips are required to transport any additional luggage and any mail or freight that also was brought in on the fixed-wing aircraft. Due to capacity limitations, multiple helicopter trips are required to transport a full fixed-wing plane load of passengers or freight.

Delays in transportation occur due to a variety of seasons (both weather and mechanical, caused by either the fixed wing, the helicopter, or both). Individuals who are delayed are typically located either in the community of Akutan (when headed outbound to Akun), or on Unalaska/Dutch Harbor (when headed inbound into Akun). Due to the continual coordination of fixed-wing and helicopter flights, delays experienced on Akun are extremely rare. While data on cancellations starting in 2020 and going through 2022 is available, data on delay times (count of occurrences and duration) is not tracked and no data is available.

In addition, short-term delays have a minimal impact to passengers in Akutan as they can continue with their day in the community and are notified by the carrier via telephone when the helicopter is resuming operations. Without data regarding the delays experienced by helicopter passengers and given the complexity of forecasting a change in transit times, delay durations, and frequencies for a helicopter in FWOP

conditions and a ferry in FWP conditions (particularly when no historical information is available), passenger delays are eliminated from further analysis.

### **5.1.3. Trident Seafoods Transportation Methods**

#### **5.1.3.1. Staff/Employees/Visitors**

Trident Seafoods employs significant numbers of people to staff their Akutan processing plant. The employees of Trident are typically not residents of Akutan, but instead travel from around the world to the plant at the beginning and end of their employment seasons. Marine vessel transportation from Dutch Harbor to Akutan is the most frequently utilized method as it is more cost effective and efficient due to several factors.

One reason that Trident does not use the fixed-wing/helicopter as their main transportation method is crew and freight capacity limitations are too restrictive for them when they are doing major crew shifts. Currently, plant employees are flown from Anchorage (or a similar hub) to Dutch Harbor, and then most travel by a Trident tramper vessel from Dutch Harbor to Akutan in groups of approximately 40 people.

In addition to the capacity limitations, weather conditions which lead to multi-day flight cancellations can have significant impacts on schedules. Additionally, Trident already has vessels going to/from Dutch for product runs and it is more cost effective for them to have processing crew and supplies transported on their own vessels.

While the bulk of their processing crew movements would not impact FWOP helicopter traffic data of the study, it is expected that there would be a reduction associated with individuals or small groups of employees, contractors, VIP guests, inspectors, etc directly tied to Trident operations which travel to/from Akutan throughout the year utilizing the helicopter link between islands.

Sporadically, Trident also will utilize their fishing vessels or trampers to transport smaller numbers of non-Trident employees or visitors (up to about 8 individuals) when the need arises (particularly when flight cancellations would otherwise prevent small groups from accessing Akutan). In these cases, individuals are provided with the opportunity to ride along on existing trips the fishing vessels are already making between islands. Trident does not receive any funds for these passengers.

#### **5.1.3.2. Frozen Seafood Products**

Frozen processed fish products are transported out of the community directly from Akutan on Trident vessels. Frozen seafood is not transported on the helicopter or fixed-wing aircraft due to cost and weight limitations.

#### **5.1.3.3. Fresh Seafood Products**

The value added in fresh seafood is highly dependent on product quality. While Trident has done small scale research projects to explore potential expansion into the fresh seafood market, logistics and the cost of moving fresh catch through the multiple transportation legs (Akutan to Akun to Dutch Harbor to Anchorage and then on to the



global fresh seafood market) has made fresh seafood from the Akutan processing plant unfeasible.

Air transportation for fresh product is preferred over marine transportation. Utilizing the existing Trident fishing vessel fleet is not viable since fishing vessels are not designed to provide transport for fresh, processed seafood that is destined for market. Even if an appropriate vessel were to be identified, adding a significant amount of transport time into the supply chain (5 to 8-hour transport from Akutan to Dutch Harbor plus offload and loading time in Dutch Harbor), impacts quality and market access.

According to Trident, the inability of fresh catch from Akutan to compete in the market is not only due to the Akutan/Akun transportation link, but the distance overall. Other locations in Alaska such as Kodiak, Sand Point, Cold Bay, or other landing locations on the mainland outcompete fresh catch from Akutan due to transportation distances.<sup>15</sup> Due to these considerations, growth in the fresh seafood market is not anticipated under any future scenario. All the product from Trident's Akutan plant is frozen food products, dehydrated byproduct, or bulk packed oils, which are all shipped via marine methods.

#### **5.1.4. Fuel and Freight**

##### ***5.1.4.1. Trident's Operations***

Both the community of Akutan and Trident own fuel storage tanks. Fuel is primarily transported directly to Akutan by barge.

Trident does occasionally sell fuel to the community of Akutan, but the volume is "minimal".<sup>16</sup>

##### ***5.1.4.2. Akutan Community Operations***

###### ***5.1.4.2.1. Mail and Light Freight***

Cargo is delivered by the fixed wing aircraft between Dutch Harbor and Akun, and then carried on the helicopter between Akun and Akutan.

Mail and light freight are transported via helicopter as a secondary priority (below passengers). Usually, mail is moved along with luggage or on empty return flights to maximize efficiency. According to Maritime Aviation, a general estimate is around 85% of the scheduled service days would have cargo on at least one of the flights.

Mail and light freight are transported between Akun and Akutan on the helicopter using two methods. The first involves transport of cargo by placing it inside the helicopter (either in the passenger cabin or in the luggage compartment). While passengers are prioritized above mail/freight movements, when less than a full load of passengers is on board, the flight can accommodate a mix of both. The second freight method involves

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<sup>15</sup> Personal Communication with Trident Seafoods Plant Manager, 31 March 2022

<sup>16</sup> Personal Communication with Trident Seafoods Plant Manager 4 March 2022

the transport of cargo outside the aircraft, suspended on a special hook or other type of attachment – often referred to as “sling loading.”

Mail is normally slung only if the quantity is such that moving the mail internally in the helicopter would result in multiple trips being necessary. This can happen if the fixed wing has not delivered mail in several days and then brings a large load, or sometimes during high volume times (such as the holidays). Sling loads of mail can usually be up to approximately 800 pounds and are estimated to occur at a rate of 2-10 slings per month. Weather limitations do impact sling operations. Usually winds of 15-20kts or more, ceilings below 300’, or visibility below 2 miles will postpone any planned sling operations. Due to increased risk to the helicopter while undergoing sling load operations, optimal weather conditions are required.



Figure 23. Helicopter Sling Load Operations

Source: Maritime Helicopters, <https://maritimehelicopters.com/photo-library/>

In the case of flight cancellations due to weather or other factors, cargo can be stored inside the hanger on Akun. Due to the high cost of the helicopter operations, it is common for the pilots to wait until a full sling load has been acquired before making a trip.

49 USC 41903 requires that duly licensed U.S. certificated carriers transport mail on their authorized foreign air transportation service and their services within Alaska. 49 USC 41901 and 41907 require the Department to “set fair and reasonable rates” that

the U.S. Postal Service will pay air carriers to transport mail within Alaska. The Office of Aviation Analysis issues orders setting mail rates<sup>17</sup>.

The USPS stops tracking mail shipments at Dutch Harbor, so Akutan community members lose the ability to track their package or anticipate its delivery for the final legs of its journey. Given that packages are a lower priority than passengers, and the impacts of weather on sling load operations, these delays for the Akun/Akutan leg can be significant.

Most of the mail and light freight transported by the helicopter goes into the community and supports the day-to-day needs of Akutan, with a much smaller percentage being transported away from the community (mostly consisting of USPS mail). Of the total for 2018 through 2021, over 90 percent of the combined mail and light freight was delivered to the community for use, with less than 10 percent (by weight) utilized elsewhere. See Table 13 for additional information.

Table 13. Annual Mail/Freight by Inbound and Outbound, 2018-2021

		2018	2019	2020	2021	Total
Inbound (lbs)	USPS	71,511	68,718	106,597	108,526	355,352
	Non-Mail Freight	68,964	91,298	162,037	74,529	396,828
	<b>Total</b>	<b>140,475</b>	<b>160,016</b>	<b>268,634</b>	<b>183,055</b>	<b>752,180</b>
Outbound (lbs)	USPS	13,196	12,294	13,205	14,386	53,081
	Non-Mail Freight	4,251	3,873	5,800	4,981	18,905
	<b>Total</b>	<b>17,447</b>	<b>16,167</b>	<b>19,005</b>	<b>19,367</b>	<b>71,986</b>
Percent Inbound	% of USPS that is Inbound	84%	85%	89%	88%	87%
	% of Non-Mail Freight that is Inbound	94%	96%	97%	94%	95%
	<b>Overall % Inbound</b>	<b>89%</b>	<b>91%</b>	<b>93%</b>	<b>90%</b>	<b>91%</b>

Source: Maritime Helicopters and Grant Aviation

Frozen foods, bulk freight, lumber, and other building supplies, etc are transported directly to Akutan (bypassing Akun) via barge. Barge trips can occur every two weeks.

#### 5.1.4.2.2. Fuel

Fuel is transported to Akutan via Delta Western barges from Dutch Harbor. According to the Mayor of Akutan, the city has a 30,000-gallon fuel capacity and DOT has an 8,000-gallon capacity.

There are no aircraft fueling facilities on Akun so neither the fixed wing planes nor the helicopter refuel there. Fuel transported from Akutan to Akun supports airport

<sup>17</sup> <https://www.transportation.gov/policy/aviation-policy/small-community-rural-air-service/alaskan-mail-rates>

operations including the generator and maintenance equipment. Small amounts of fuel are transported from Akutan to Akun by the helicopter (sling loads) or by skiff in drums, and is transferred twice per year (spring and fall) to provide for airport operations.<sup>18</sup>

#### **5.1.5. Marine Transportation (Skiff Operations)**

Currently, no protected moorage areas are available on Akun Island. However, many community members own personal and subsistence skiffs and in favorable weather conditions, airplane passengers may choose to have a family member or friend transport them across Akun Strait via skiff rather than purchase the \$100 one-way helicopter ticket. In these instances, the skiff will be dragged onto the beach in Akun for loading and unloading before returning to Akutan. These skiffs are small vessels which are open to the weather and need optimal conditions (wind, wave and tide) to operate safely. Despite those limitations, passengers can choose to be transported via skiff rather than pay for a helicopter ticket.

In addition to wind, fog, and wave conditions, tidal currents are a significant consideration for small craft when traveling through the Akun Strait (also called Akutan Strait). Current practice is for skiffs to cross over to Akun during the slack tide, or else head north of the strait in a wide arc before heading south to Akun to avoid standing waves and strong tidal currents off the west coast of Akun. See the Hydraulic appendix (Appendix A) for additional information.

### **5.2. Trident Seafood's Operations/Employment**

Trident Seafoods is a significant employer on the island, with more than 1,400 company housed employees during peak seasons. However, the direct impact to employment and housing in the village of Akutan is minimal as most workers are transient and not residents of the community.

### **5.3. Other Social Effects**

Remote Alaska communities face challenges that are complex and multifaceted. The viability of a community is based on its ability to survive and thrive. Factors impacting community viability include many other social effects (OSE) criteria that are difficult or impossible to quantify monetarily but are of critical importance.

In order to determine the key OSE criteria for Akutan, data gathering began at the charette and continued throughout the study process. A site visit specifically targeted to inform this topic was conducted in October of 2022 and included multiple public meetings (including one-on-one and group communication opportunities) along with a focus group. The overall question being investigated during this trip was "What are the struggles of your community and how can this project help or hurt?"

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<sup>18</sup> Information gathered during community meeting in Akutan on 12 October 2022

Participants at the focus group were selected from a wide-ranging pool of village residents with the aim to have representation from all elements of the community (i.e. skiff owners, retired and current commercial fisher IFQ holders, elected government officials and representatives, tribal members, village corporation members, and Aleut corporation members). In all, a total of nine key community members were invited to the charette (in accordance with OMB survey approval requirement maximums) and every invited individual attended.

The focus group was held in two sessions at a central location in the community (the Bingo Hall), with an afternoon session on 11 October 2022 followed by a morning session on 12 October. The first session included a general discussion of the conditions experienced by the community and the proposed project sites, an explanation of how CE/ICA and MCDA are conducted and their importance to the analysis process, with most of the time invested in refining the key OSE criteria. Preliminary criteria had been established based on prior information gathered from community members, which was expanded during the focus group. The final criteria included Health and Safety; Subsistence; Delivery of Essential Non-Medical Goods; Cultural Identity (non-food gathering traditional practices); Income opportunities; Community Growth and Expansion; Transportation Mode Preferences; Noise Pollution; and Local Vessel Access. The participants then each assigned weights to the criteria as either low, medium, or high importance on individual scoring sheets to determine which criteria are viewed as the most critical to making a project decision.

The second session of the focus group allowed for a recap of the prior day's discussions followed by an in-depth exercise to score each individual criteria under various alternative scenarios to determine how well the criteria was met under each. Analysis of data which was gathered is presented later in this appendix (Section 7.9), and each criterion is discussed individually in the following subsections.



Figure 24. OSE Focus Group, October 2022

### 5.3.1. Health and Safety

Medical care within the village is conducted at Anesia Kudrin Memorial Clinic which is a community health center run by Eastern Aleutian Tribes. While this clinic provides urgent care, community members requiring significant or specialized medical attention, surgeries, etc. must access those services off-island.

Health and Safety was the top concern for the community, as indicated by the criteria weighing exercise conducted during the focus group. Medicines currently come into the community from the Alaska Native Medical Center in Anchorage and are delivered to the community using USPS via the helicopter<sup>19</sup>. Under existing conditions, the community experiences inconsistent and unreliable delivery of medicine and other critical supplies caused by weather delays and flight cancellations which impact either the helicopter, the fixed wing plane, or both. When storm conditions settle into the Aleutians, the community can be without mail deliveries for days or weeks at a time due to flight cancellations. If a critically needed medication is unable to be delivered to the community, it can become a crisis situation. Delays in delivery of medications can reduce the quality of life and can cause worsening medical conditions.

Akutan has a small clinic that provides limited medical care, but for some non-emergency scheduled medical appointments (childbirth, specialized care and treatments, etc) the community members must travel off-island to a hub community (for example, Dutch Harbor, Anchorage, or Seattle). These appointments and associated housing (such as hotel reservations) must be made in advance. If weather prevents the helicopter from flying, these medically necessary trips must be rescheduled which can lead to delays in care and cancellation fees.

In addition to the community members seeking medical care outside of the community, certain medical teams will occasionally come to Akutan to provide care (for example, a dental team will visit the community and provide care to the village before departing to

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<sup>19</sup> Information provided by the Mayor of the Aleutians East Borough during the Planning Charette.

repeat the process at another village). When weather cancellations prevent the medical teams from reaching Akutan, the community drops to the bottom of the waitlist and can experience significant delays waiting for the medical team to return.

When a member of Akutan experiences a medical emergency, they are transported out of the community for medical care using the helicopter and are met on Akun Island either by a scheduled fixed wing flight, or a LifeFlight medivak emergency fixed-wing plane. On average, about 10 medivak helicopter trips occur per year with most originating from Trident workers<sup>20</sup>. When a weather event occurs at the same time as a medical emergency, the community relies on the US Coast Guard to provide medical evacuations along with LifeMed which has a fixed wing based in Dutch Harbor.

Occasionally, search and rescue operations occur when an individual or small group of community members that traveled to Akun via skiff for subsistence purposes become stranded when weather blows in preventing a return trip to Akutan. In the past, community members have been stranded long enough that in one instance a deteriorated historical wooden structure was torn apart to be used as survival firewood for the individuals while they waited for help to arrive. Other examples of emergency situations on Akun included not having enough fuel for a skiff to return to Akutan, and weather preventing a return trip which led to individuals running out of food and provisions while waiting for the weather to break.

The helicopter also supports regional search and rescue and medivak operations. One example provided was when a vehicle rolled off a mountain in Unalaska and the helicopter provided search and rescue support. According to Maritime Aviation, there is no tracking of regional SAR occurrences, but it is estimated that they occur 1-3 times per year.

### **5.3.2. Subsistence**

Subsistence activities are an important source of food and cultural tradition for the community of Akutan. A significant amount of the historical subsistence information presented in this section was informed by the Alaska Department of Fish and Game (ADF&G), Division of Subsistence Technical Paper No. 371. The technical paper was an outcome of a large research project conducted in 2008 aimed at gathering subsistence data for a small number of Bering Sea communities including Akutan. The study was coordinated through the Akutan Community Advisory Board which was formed specifically for the research project, the Akutan Tribal Council, and the City of Akutan. The research had 2 components: collecting subsistence harvest data through comprehensive household surveys, and key respondent interviews with Akutan residents particularly knowledgeable about the local environment. Out of 40 year-round resident households present in 2008, 36 households (90%) were interviewed. Of the

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<sup>20</sup> Personal Communication with Maritime Aviation, February 2022

households not interviewed, 3 refused to be interviewed and the remaining household was not able to be contacted.

Harvests amounts and species vary from year to year due to a variety of factors. For example, salmon harvests depend heavily on which species of salmon is running each year. Plant harvests can vary based on rain amounts and temperatures. To compensate for this variability between years, harvest species and amounts have been estimated through a variety of survey efforts by the state of Alaska and other institutions and average harvest levels have been identified. Data gathering for these efforts consisted of repeated in-depth household subsistence use surveys and mapping.

In 2008 (which is considered a representative year by ADF&G), the community of Akutan harvested nearly 27,000 pounds of wild foods, averaging 327.3 lb per capita. This compares to a 2015/16 survey done by the University of Alaska Institute of Social and Economic Research that estimated Akutan subsistence harvests at 439 pounds per capita.<sup>21</sup> Detailed harvest information is available for 2008. In that year, salmon made up the largest portion and contributed 45% of the harvest and averaged 146 lb per person; followed by fish other than salmon (25%, 80 lb); shellfish (10%, 34 lb); marine mammals (8%, 26 lb); wild plants and berries (5%, 16 lb); land mammals (4%, 15 lb); and birds and eggs (3%, 10 lb). See Figure 25.

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<sup>21</sup> Adapting to Environmental and Social Change: Subsistence in Three Aleutian Communities. Schmidt, Jennifer and Berman, Matthew. Institute for Social and Economic Research, University of Alaska Anchorage.



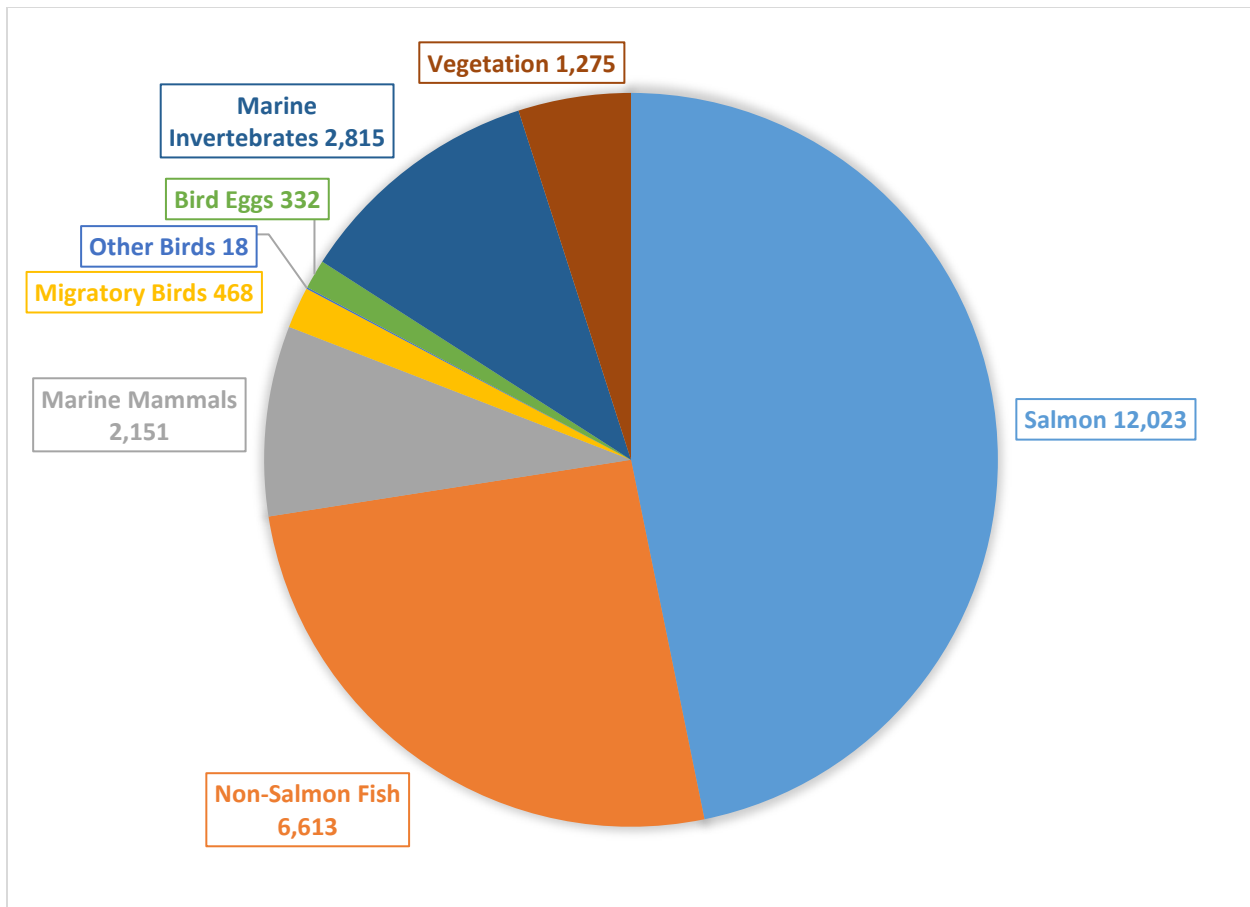


Figure 25: Estimated Total Pounds of Subsistence Resources Harvested in Akutan Annually

Source: Alaska Department of Fish and Game, Subsistence Division. Based on year 2008 data which is considered representative.

In the 2008 study year, 100% of Akutan households received and used (“used” refers to if a household ate, processed, harvested, or received a resource from other households) at least one wild resource for subsistence. In addition, 97% of households engaged in fishing, hunting, or gathering activities, and 86% of households shared at least 1 resource with other households. Akutan households used an average of 17 resources and a maximum of 42 resources per household. On average, households attempted to harvest 10 kinds of resources (with a maximum of 41) and succeeded in harvesting an average of 9 resources (with a maximum of 38 harvested). On average, households gave away 8 resources to others and received on average 12 resources.

The importance of subsistence to the community of Akutan is evident when the comparable per capita subsistence harvest amounts for communities within the Aleutians East Borough are reviewed. Akutan per capita harvests are approximately 20 pounds higher than the average for the borough (327.28 pounds for Akutan, compared to an average of 307.86 for the borough).

Table 14. Per Capita Subsistence Harvests for Aleutians East Borough Communities

<b>Community</b>	<b>Representative Year</b>	<b>Pounds Per Capita</b>
Akutan	2008	327.28
Cold Bay	2016	231.73
False Pass	1988	412.51
King Cove	2016	297.40
Nelson Lagoon	1987	253.92
Sand Point	2016	324.35

Source: Alaska Department of Fish and Game, Subsistence Division

As in most other rural Alaska communities, specialization by households in subsistence harvesting is evident in Akutan. About 11% of Akutan households accounted for 71% of the community’s total harvest of wild foods as estimated in usable pounds. These “super-households” shared their harvests with others in the community.

In 2008, there were numerous personal skiffs and 4 larger boats (between 16-60 feet in length) owned by Akutan residents. The 4 larger boats were used for commercial halibut and cod fishing as well as subsistence fishing and hunting. The owners of these boats were also some of the main providers and distributors of subsistence caught fish, marine mammals, and birds in Akutan. Skiffs were also used to support subsistence fishing, hunting, and gathering.<sup>22</sup>

Subsistence harvests and uses documented by the Division of Subsistence in 1990 and 2008 were shown to be of continuing importance and need for Akutan. Timing for local resource harvest and use procurement activities is much the same as has been done historically by Unangan people. Resources harvested throughout the year were variable depending on resource availability, ocean conditions and weather (which impact access). For example, in the spring, Akutan residents focused their attention on fishing halibut, cod and Dolly Varden; summer consisted of egg gathering, geese hunting and salmon fishing and berry and plant gathering; fall activities included marine mammal and waterfowl hunting; and winter activities included marine mammal, waterfowl, and octopus hunting.

Subsistence resource harvest use areas were mapped in 2008. All subsistence hunting, gathering, and fishing by Akutan subsistence hunters and fishers occurred on and between Akutan, Akun, Anatanak, and Rootok islands, with most marine resource harvesting concentrated along the shores and within the waters of Akutan Bay and Akun Strait, located between Akutan and Akun islands. Geographic range for harvesting is typically limited to less than 10 miles from the village, or 1 hour by boat. This is due in

<sup>22</sup> Fall, J.A., C.L. Brown, N.M. Braem, L. Hutchinson-Scarborough, D. S. Koster, T.M. Krieg, and A.R. Brenner. 2012. Subsistence harvests and uses in three Bering Sea communities, 2008: Akutan, Emmonak, and Togiak. Alaska Department of Fish and Game, Division of Subsistence Technical Paper No. 371, Anchorage.

part to fuel costs (particularly for larger vessels) and wave conditions (smaller skiffs with outboard motors limit travel to relatively calm weather).

Resources hunted and gathered from the land for subsistence, including gathering of eggs, berries, beach greens and other plants, freshwater fishing, and hunting of ptarmigan and some migratory waterfowl, took place primarily in the land near and hills behind the village, beach front areas surrounding Akutan Harbor, and throughout Akun Island including the rock outcrops south of Akun Island. Migratory waterfowl, geese, ducks, seabirds, and marine mammals (harbor seals, sea lions and migrating fur seals) were also hunted throughout Akutan Bay and in the waters of Akun Strait and on Akun Island. Gull eggs were taken primarily at Akun Head, the cliffs at the northeast point of Akun Island.

In 2008, most species of salmon (sockeye, coho, Chinook, chum) were frequently caught with subsistence gillnets off the point of land just east of the village at the entrance to Akutan Harbor. Pink salmon were mostly taken at the head of Akutan Harbor above Trident. All other species of salmon were harvested in the bays and tributaries from Akutan Harbor and northwest to the island's northern most point, called "North Head." Sockeye and coho salmon were also caught near the old Unangan village of Chulka, located on the southwest side of Akun Island, next to the long, curved beach called "Surf Beach" or "Surf Bay."

Akutan informants remarked that Akun Island is fairly flat, with lots of protected bays and streams and is far more productive in terms of harvestable subsistence resources than Akutan Island, which is mostly mountainous. When weather and tides permit, it is common for Akutan residents to boat to Akun Island (particularly near Surf Beach and Chulka) to have a picnic, camp, or hunt, fish, or gather a variety of subsistence resources including salmon, non-salmon marine fish, freshwater fish, seals or sea lions, geese, ducks or other seabirds, berries, plants, bird eggs, firewood, or marine invertebrates. In addition, feral cattle live on Akun Island and about 2 are harvested annually for the village. This abundance of resources is undoubtedly why many ancestral Unangan people lived on Akun Island prior to moving to Akutan when cash economy was introduced with the arrival of the fur, whale, and fisheries businesses established in Akutan Bay starting in 1878.

Non-salmon saltwater fish such as Pacific cod, sablefish (blackcod), and rockfish were generally harvested while targeting halibut. Greenling and greenling roe were obtained in Akutan Harbor and near the point of Akutan Harbor, and saltwater Dolly Varden were fished along the northern shores of Akutan Harbor and in 2 bays of Akun Island. Halibut fishing occurred in the broadest area from the northeastern end of Akutan Island in Hot Springs Bay, east to Lost Harbor on Akun Island, and south throughout Akutan Bay, Akun Strait, Avatanak Strait (between Akun Island and the 2 islands to the south, Avatanak and Rootok islands), as well as along the south side of Akutan Island and west to the Baby Islands. Key respondents in 2008 commented that if halibut are

available they will fish (or hunt) as close to the village as possible, and generally in the waters of Akun Strait, just west of Akun Island.

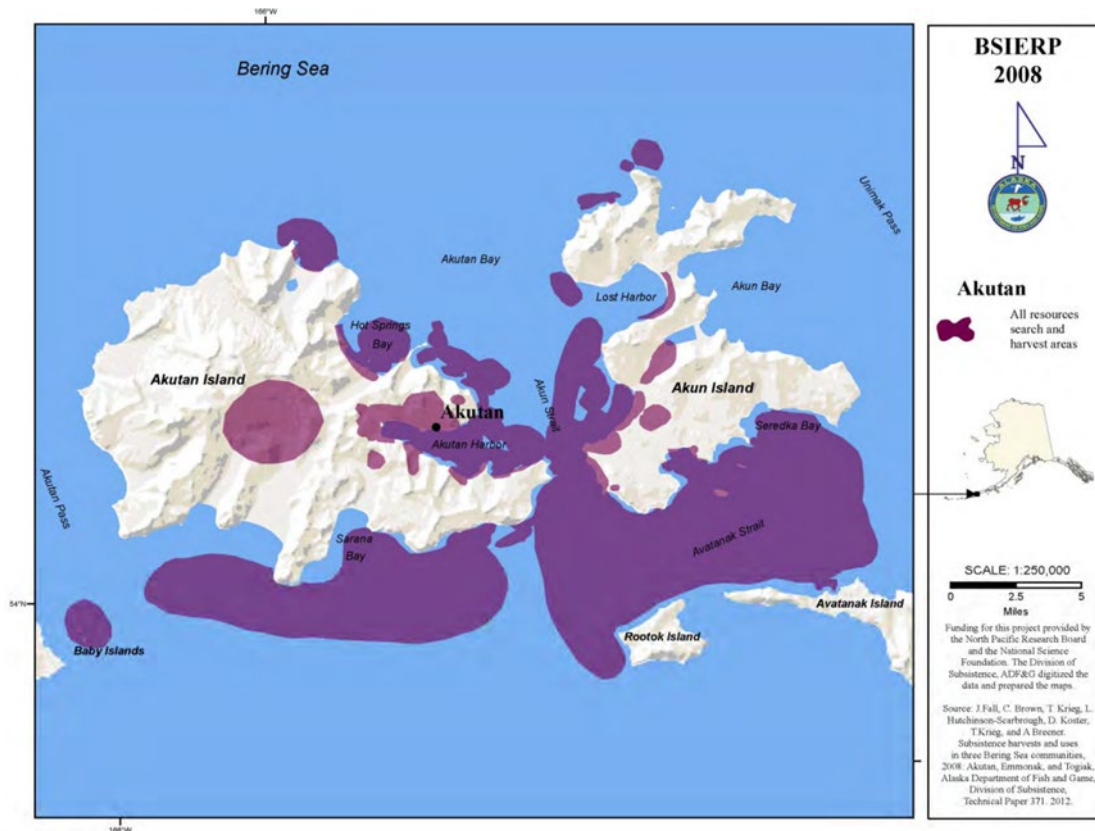


Figure 26: 2008 Subsistence Harvest Locations and Search Areas, All Resources  
Source: Alaska Department of Fish and Game, Subsistence Division

Subsistence harvesting is critical to the residents of Akutan for nutritional and cultural reasons. Akun, as the historical village site, is a key location for harvesting everything from plants to animals. The helicopter is generally not used for subsistence harvest trips due in part to the high cost involved to purchase tickets, but also due to the space/weight limitations of the helicopter to transport the tools needed for harvesting, the material that is harvested, and the harvesters themselves. Community members that have a skiff will transport a small group to Akun for harvesting. However, the crossing to Akun can be difficult in a small, flat bottom, open skiff; therefore, subsistence harvesting participation by the very young and very old is limited due to access.

Weather conditions can also negatively impact harvest of target species. Subsistence resources that have short harvest durations (for example, a salmon run or spring egg harvesting) can be missed if weather prevents access to Akun via skiff during harvest windows.

Subsistence is about more than just access to a harvestable resource. To successfully subsist, individuals must also have reliable access to skiff repair parts, gasoline, etc. Currently, deliveries can be hindered when weather conditions prevent USPS helicopter deliveries to Akutan, and subsistence harvest windows change with the seasons. A delay receiving the necessary parts required for a skiff repair, for instance, could prevent that vessel from being used to subsist.

Additionally, there is currently no ability for community members to transport 4-wheel ATV's to Akun. The distances between harvest sites on Akun can be significant, and the terrain marshy, which makes accessing them challenging on foot.

### **5.3.3. Delivery of Essential Non-Medical Goods**

Many community supporting goods come to Akutan by helicopter – occasionally as a sling-load operation (a net towed below the helicopter on a rope). These goods include everything from mail and packages, food, skiff repair parts and other supplies/materials required for subsistence and traditional practices. Fuel (which is transported from Akutan to Akun to fuel the generators used for the airport) is also transported in barrels by the helicopter and skiff. The helicopter prioritizes people and their luggage above general freight so freight delays can occur, particularly during peak travel times on and off the island. In addition to delays, both community members and the helicopter pilots indicated that mail has been lost in transport.

### **5.3.4. Cultural Identity (non-food gathering traditional practices)**

Maintaining a strong cultural identity is essential for Alaska Native communities to thrive. Cultural traditions are passed from one generation to the next and include both oral and physical components. With the traditional village site being located on Akun rather than Akutan, access to Akun Island is even more important for the cultural practices of this community. The community has identified graves on Akun, along with repatriating some remains that had become exposed due to erosion. Artifacts are very prevalent and can easily be observed. The PDT experienced this while exploring potential project sites on Akun – countless stone tools were witnessed while walking between the preliminary proposed project site locations.

“Culture camps” are hosted on Akun Island, which includes youth participants not only from Akutan but also from neighboring villages.

Non-food materials are harvested on Akun as part of cultural practices (for example, grasses are harvested for traditional basket making).

### **5.3.5. Income Opportunities**

Income opportunities that could be quantified would be included in the NED analysis, however there are potential areas for growth that the community has identified but due to high levels of uncertainty are not able to be quantified. Some of these areas include potential for tourism expansion on Akutan and Akun, along with cattle harvesting on Akun. The Aleutians Pribilof Islands Community Development Association has

expressed an interest in expanding tourism in Akutan/Akun, particularly focusing on bird viewing and/or whale watching opportunities, however tourism development is expensive and there are no immediate plans for implementation.

#### **5.3.6. Community Growth and Expansion**

The community of Akutan is unable to expand its geographic footprint at its current location due to being bounded on all sides by water and bounded inland due to topography. The hillsides are steep and there is little available buildable land. Historically, the community was located on the island of Akun prior to relocating to the island of Akutan. During the project charette, community members indicated that they have been looking into options to expand the community back to Akun. While it would be considered somewhat unlikely to split the population geographically due to hesitancy of community members, under this scenario it is possible that homes and businesses would slowly be built on Akun if/when buildable locations on Akutan are unavailable. Having the airport, the Surf Inn hotel, and historical village sites on the island of Akun encourages this expansion between the neighboring islands.

#### **5.3.7. Transportation Mode Preferences**

Each individual's level of comfort with transportation via helicopter, skiff, or ferry varies. However, during the charette a participant from the community indicated that there is distrust of the helicopter by some in the community and that they prefer marine travel as a method of transportation whenever it is available. This comfort with marine transportation is natural given the remote, Aleutian Island maritime traditions. Additionally, the helicopter can be challenging for those with mobility issues.

#### **5.3.8. Noise Pollution**

Noise pollution is experienced by the community due to the helicopter making repeated trips to and from the island. However, the flight path is designed to minimize the noise experienced by the community by primarily traveling over water. Interviews with the community members indicated that wildlife quickly adapted to the noise and do not flee the area when the helicopter is operating, and that residents are not heavily impacted by the noise either.

#### **5.3.9. Local Vessel Access**

Skiffs are small, open, flat-bottomed boats that are commonly owned by residents of Akutan and used for both commercial and subsistence harvesting. Currently, skiffs are launched on rocky beach areas around Akutan or from a narrow ramp near the skiff moorage area.

Larger vessels capable of commercial fishing seek transient moorage at the skiff moorage area and at Akutan Harbor at the head of the bay.

Residents use their skiffs to cross Akun Strait to reach Akun during optimal weather windows. On Akun, skiffs are tied or dragged onto the beach. However, skiffs are not generally left unattended on Akun and at least one community member often stays

behind with the vessel (preventing that individual from engaging in subsistence or other activities on Akun with the remainder of their group.)

There are no reported incidents of vessel damage due to lack of moorage on Akun by community members.

#### **5.4. Summary of Existing Conditions**

Existing conditions for the community of Akutan include a multi-modal transportation network between islands (fixed wing and helicopter) with annual helicopter service costing approximately \$2.3 million dollars per year which is heavily subsidized by both the Aleutians East Borough and Essential Air Service. Despite the high cost of the annual contract, critical community needs such as transportation for medical services, delivery of critical medical supplies, delivery of non-medical goods, and subsistence access (particularly for the young and old) remains hindered.

## **6.0 FUTURE WITHOUT PROJECT CONDITIONS**

### **6.1. Assumptions**

The resident population of Akutan has remained relatively stable over time, averaging between 55 and 169 people since 1880, with a 2020 population of 113 individuals (see Section 3.1 for additional information.) At this time, there is no reason to assume significant growth or decline in the permanent resident population of the community and this population is assumed to remain static through the forecasted study period.

As this project is formulated for the community of Akutan, rather than for the transient population of the Trident Seafoods processing plant, transient workers are not included in the FWOP baseline. It is worth noting, however, that there is significant uncertainty related to the future of operations of the Trident plant in Akutan and the company is currently researching the feasibility of closing the Akutan based plant and building a new facility in Dutch Harbor. If this were to occur, while the baseline resident population utilized in this analysis would not change, the high cost of the helicopter contract and the impact of weaknesses with the FWOP condition transportation network on long-term community viability would become even more critical after losing the fish tax.

### **6.2. Transportation**

Transportation between the Akutan airport on Akun Island and the community of Akutan on Akutan Island will continue to rely on the costly helicopter service in the FWOP condition, which is often hindered by weather. The Essential Air Service subsidy which provides supporting funding for the helicopter must be renewed every two years, and no backup plan currently exists to maintain the transportation link to the community if that subsidy were to not be renewed. This is considered unlikely and the FWOP assumption is that the subsidy (and service) is maintained.

The Coast Guard will continue to be called in for medical emergencies when weather conditions prevent fixed-wing flights to Akun. Air transportation to medical appointments off island will continue to be delayed, and USPS deliveries of medicines needed from Anchorage will continue to be delayed because of the delays in mail from Anchorage. Delays in delivery of medications can reduce the quality of life and can cause worsening medical conditions.

### **6.2.1. Alaska Marine Highway System Ferry**

The Alaska Marine Highway System experiences funding and staffing challenges, which can lead to difficulties in maintaining service levels across the state. Despite that, it is critical to the transportation network of Alaska (particularly since so many Alaskan communities are not connected through a road system) and it remains a priority for the State of Alaska. For purposes of this analysis, it is assumed that AMHS service to Akutan continues at the same level as has been experienced in the past.

### **6.2.2. Fixed Wing Service**

It is assumed that in FWOP conditions the fixed-wing service to Akun will continue to operate similarly to the existing conditions.

While participation in the EAS subsidy must be renewed every two years, no changes to the EAS service provided by Grant Aviation are anticipated under FWOP conditions. In support of these assumptions, Grant applied for an expanded service period of 3 years (beyond the typical 2-year service period) to EAS for the service window starting in 2023, showing interest in maintaining the service to the island. In addition, a similar but competing regional carrier also expressed interest in the service contract.

### **6.2.3. Helicopter Operations**

It is assumed that in FWOP conditions the helicopter service will continue to operate similarly to the existing conditions.

While participation in the EAS subsidy must be renewed every two years, no changes to the EAS service provided by Maritime Aviation are anticipated under FWOP conditions. Maritime (similarly to Grant Aviation) applied for an extended 3-year EAS contract, supporting the assumption that they plan to remain providing service to the community in the FWOP condition.

Starting in 2012, the Aleutians East Borough committed to providing access between Akutan and the Akun Airport for a period of 20 years which would expire in 2032. At that time, the borough assembly would need to approve an extension if one was desired. The other potential path starting in 2032 would be a shift of the financial burden for the helicopter to the City of Akutan<sup>23</sup>. For purposes of this analysis, it is assumed that the

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<sup>23</sup> Information provided during Project Delivery Team meeting on March 8, 2023 by the Aleutians East Borough



current transportation network will be maintained regardless of the entity paying for the service.

### **6.3. Marine Transportation (Skiff Operations)**

In future without project conditions, it is assumed that the residents of Akutan will continue to choose to utilize their personal vessels to access Akun Island at a similar rate when compared to historical and existing conditions.

### **6.4. Trident Seafood's Operations/Employment**

There is significant uncertainty regarding future operations of Trident Seafoods in Akutan. The company is currently investigating the feasibility of moving their Akutan based processing facility to Unalaska Dutch Harbor, which would likely lead to a full closure of the processing plant in Akutan.

This USACE study is formulated to meet the goals and objectives of transportation improvements serving the community of Akutan, rather than serving the needs of a single business (Trident Seafoods). Due to the significant amount of separation between the two populations (transient workers vs village residents) the impact of a closure of the Akutan based processing facility to the overall analysis is not significant.

While some level of reduction in the transportation demand associated with VIP guests, inspectors, etc. directly associated with plant operations would be expected if the plant were to relocate, the primary transportation method for Trident processing employees is Trident vessels rather than the helicopter/fixed-wing, and any changes to transportation demand would be similarly borne across FWOP and all FWP condition scenarios and is not likely to impact FWP plan selection.

### **6.5. Fuel and Freight**

No shift in fuel and freight operations is anticipated under FWOP conditions. It is assumed that deliveries will continue directly to Akutan via barge, with twice annual fuel barrel deliveries to occur from Akutan to Akun via helicopter or skiff in support of airport operations.

It is not anticipated that an aircraft refueling system would be installed on Akun in FWP conditions, as interviews with aircraft operators indicated that a fuel system on Akun would be very costly to install and maintain and would require testing to maintain aircraft fuel quality.

### **6.6. Other Social Effects**

Significant changes to OSE conditions in Akutan are not expected during the study period. Subsistence is a long-term practice that is critical to the culture and traditions of Akutan residents, and shifts tend to be measured in terms of generations rather than years and significant shifts are not anticipated.

For the community members, expansion to the island of Akun has been proposed to address the land limitations. A community member explained that development of lots on Akun has been proposed, including approval for a greenhouse; however, that development is yet to occur and there is not likely enough to be included in the FWOP condition forecast.

Limitations to access, impacts to safety, and all other key criteria are assumed to remain relatively static for the study period. Any unidentified shifts are anticipated to have a low risk to the project as they would be similarly borne by the FWOP and any FWP alternative scenario.

### **6.7. Summary of Future Without Project Conditions**

Absent federal action to provide navigation improvements to Akutan, transportation cost inefficiencies and negative impacts to OSE are expected to continue throughout the analysis. These adverse impacts are incurred as a result of current and expected future conditions.

A key point of uncertainty is the future of the Trident Seafoods plant in Akutan. Due to multiple reasons including this uncertainty, the population of transient workers that service the plant are not considered as part of this analysis. However, if Trident Seafoods were to cease operations in Akutan the fish tax would no longer be received by the community or the Aleutians East Borough, making the annual helicopter service cost even more prohibitive.

## **7.0 FUTURE WITH-PROJECT CONDITIONS**

### **7.1. Assumptions**

This project is formulated to meet the transportation needs of the visitors and residents of the community of Akutan. As a large private employer in the community, potential significant shifts in employment levels at the Trident processing facility could occur. In existing and FWOP conditions, the primary method of transportation for Trident workers is via Trident vessels going directly from Unalaska/Dutch to their Akutan plant. Additional VIP guests, onboard observers for commercial fishing vessels and processing plant inspectors, etc. do utilize the Akun airport and Akun to Akutan transportation link. However, while significant changes to the levels of Trident-specific passengers may occur, the primary formulation of FWP conditions is to meet the needs of the community and therefore shifts in demand levels for Akun to Akutan transportation by Trident employees and visitors does not directly impact FWP benefits.

The AEB has indicated that they do not want to purchase a ferry vessel and will be contracting for ferry services. Therefore, it is assumed that a contract for a marine ferry will be managed similarly to the current contract for the helicopter.

Annual trip counts to be made by a ferry in FWP conditions is not critical to this analysis, as it is assumed the trips will be adjusted to meet the transportation needs and weather windows similar to the FWOP helicopter service.

All alternatives will accommodate a similar vessel class and allow for utilization of the harbor on Akun. Therefore, differences between FWP benefits are largely dependent on harbor accessibility, OSE focus group response data, and the cost for implementing the alternatives.

All FWP alternatives are expected to take a total PED duration of 30 months, and a construction duration of 30 months (consisting of 3 seasonal construction windows of 6 months each) with construction complete by calendar year end 2032. The base year for benefits (project year one) is estimated as 2033.

## **7.2. Project Alternatives**

### **7.2.1. No Action**

Existing conditions in Akutan will remain the same without the development of navigation improvements. The current transportation method (helicopter) between the Akutan Airport on Akun Island and the City of Akutan will remain expensive and inefficient. Residents of Akutan would continue to experience reliability concerns for airline passengers, medical supplies, and freight.

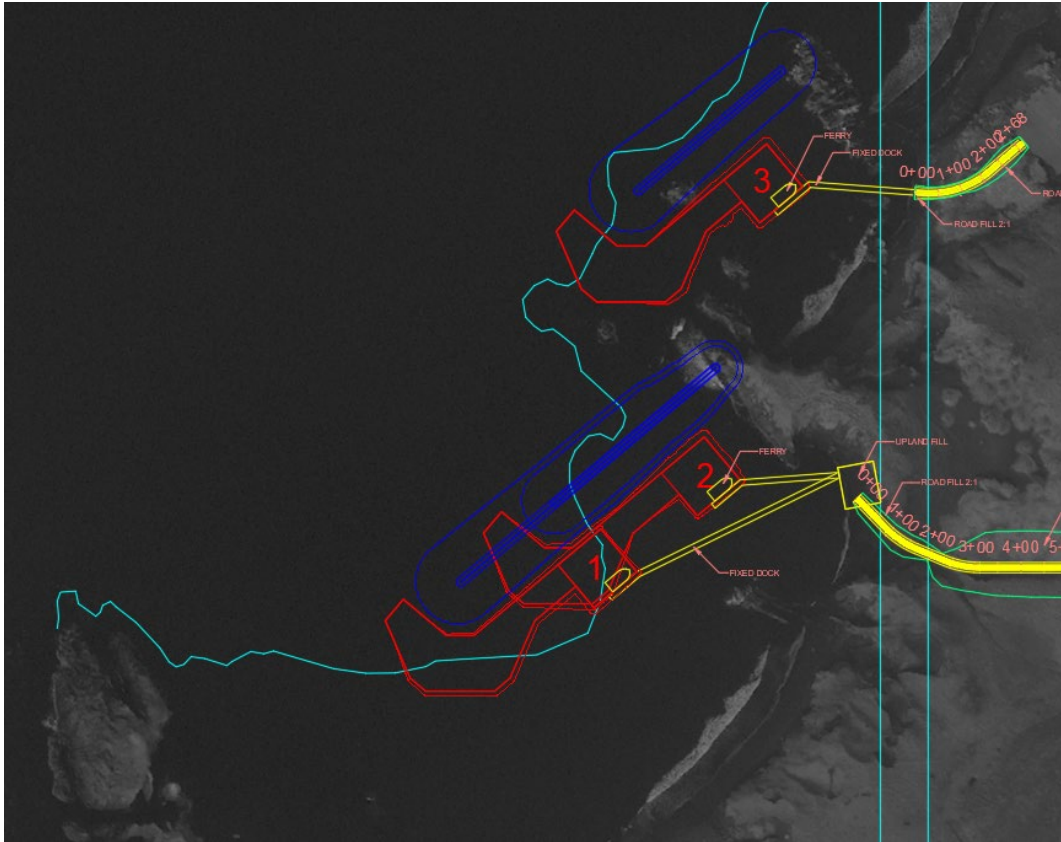


Figure 27: FWP Alternatives

### 7.2.2. Alternative 1: Harbor Southwest of Unnamed Point (without blasting)

The harbor would be sized to accommodate a design vessel with a length of 58 feet and a draft of 8 feet. The 715-foot-long rubble mound breakwater would protect a 120 foot by 120 foot turning basin. Both the entrance channel and turning basin would have a dredge depth of -13.0 feet. It is anticipated that blasting would not be required for the turning basin or entrance channel in this location. The entrance channel would have a minimum width of 60 feet to a maximum width of 120 feet when turning around the nose of the breakwater. Local service facilities required would include a 560 foot long by 12-foot-wide pile-supported dock, 60 foot by 40-foot mooring basin with mooring dolphins, uplands with an area of approximately 0.15 acres for loading/unloading freight from dock, and a 1,100 foot long by 12-foot-wide road connecting the harbor areas with the existing pad to the south of the hotel.

### 7.2.3. Alternative 2: Harbor South of Unnamed Point (with blasting)

The harbor would be sized to accommodate a design vessel with a length of 58 feet and a draft of 8 feet. The 450-foot-long rubble mound breakwater would protect a 120-foot by 120-foot turning basin. Both the entrance channel and turning basin would have a dredge depth of -13.0 feet. It is anticipated that blasting would be required for the turning basin or entrance channel in this location. The entrance channel would have a minimum width of 60 feet to a maximum width of 120 feet when turning around the nose of the breakwater. Local service facilities required would include a 290 foot long by 12-foot-wide pile-supported dock, 60 foot by 40-foot mooring basin with mooring dolphins,

uplands with an area of approximately 0.15 acres for loading/unloading freight from dock, and a 1,100 foot long by 12-foot-wide road connecting the harbor areas with the existing pad to the south of the hotel.

#### **7.2.4. Alternative 3: Harbor North of Unnamed point (with blasting)**

The harbor would be sized to accommodate a design vessel with a length of 58 feet and a draft of 8 feet. The 400-foot-long rubble mound breakwater would protect a 120 foot by 120-foot turning basin. Both the entrance channel and turning basin would have a dredge depth of -13.0 feet. It is anticipated that blasting would be required for the turning basin or entrance channel in this location. The entrance channel would have a minimum width of 60 feet to a maximum width of 120 feet when turning around the nose of the breakwater. Local service facilities required would include a 325 foot long by 12-foot-wide pile-supported dock, 60-foot by 40-foot mooring basin with mooring dolphins, uplands at the existing hovercraft pad for loading/ unloading freight from dock, and a 270 foot long by 12-foot-wide road connecting the existing hovercraft pad.

#### **7.2.5. Akutan-side FWP Considerations and Ferry Operations**

The facility upgrades on Akutan island will be the same for alternatives 1-3. At this time, it is assumed that the ferry vessel will moor in Akutan Harbor. Before each ferry trip, crew to pilot the vessel will board a skiff at the City Dock in Akutan and travel 2 miles to the ferry at Akutan Harbor (or drive on the harbor access road that is currently being constructed). The ferry vessel and crew will travel back to the City Dock where passengers and freight will board the ferry vessel. The ferry will then travel to the proposed harbor on Akun and offload passengers and freight to meet a connecting flight on a fixed wing aircraft. The ferry will travel back to Akutan City Dock with any passenger and crew from Akun. Once all runs for the day are completed, the ferry will be moored at Akutan Harbor, and crew will travel back to the Akutan City Dock via skiff or access road.

Upgrades will need to be applied to the Akutan City Dock in order to accept the ferry vessel. At a minimum, the catwalk with mooring dolphins could be replaced to the appropriate elevation for easy boarding of the ferry vessel.

### **7.3. Description of Future With-Project Conditions**

#### **7.3.1. Transportation**

##### **7.3.1.1. Marine Ferry Operations**

It is anticipated that the ferry service will be operated as a contract (similar to the existing helicopter contract) and that the vessel would not be owned or operated by the AEB.

##### **7.3.1.1.1. Design Vessel Characteristics**

The design vessel of this study is based upon two factors, regularly available vessels in the region and minimum size requirements to safely operate trips between Akutan and Akun in conditions that allow aircraft to land in Akun. Minimization of the vessel size allows for lower annual contract costs which has long term community viability benefits

for Akutan. While a larger vessel would likely have additional weather operability, given the limitations of the fixed wing additional operability would provide a minimal change to transportation while having a significant increase in costs, and was therefore eliminated from consideration.

The design vessel chosen for this study is the F/V Magnus Martens, a 58-foot-long twin screw steel monohull with a 26-foot beam and an 8-foot draft that operates across Alaska, including in the Aleutians. While the exact vessel selected will be a decision of the entity granting the contract (the AEB or similar), for purposes of this analysis it is anticipated that the ferry vessel would be a seiner/crabber/trawler type vessel due to their availability in the region.

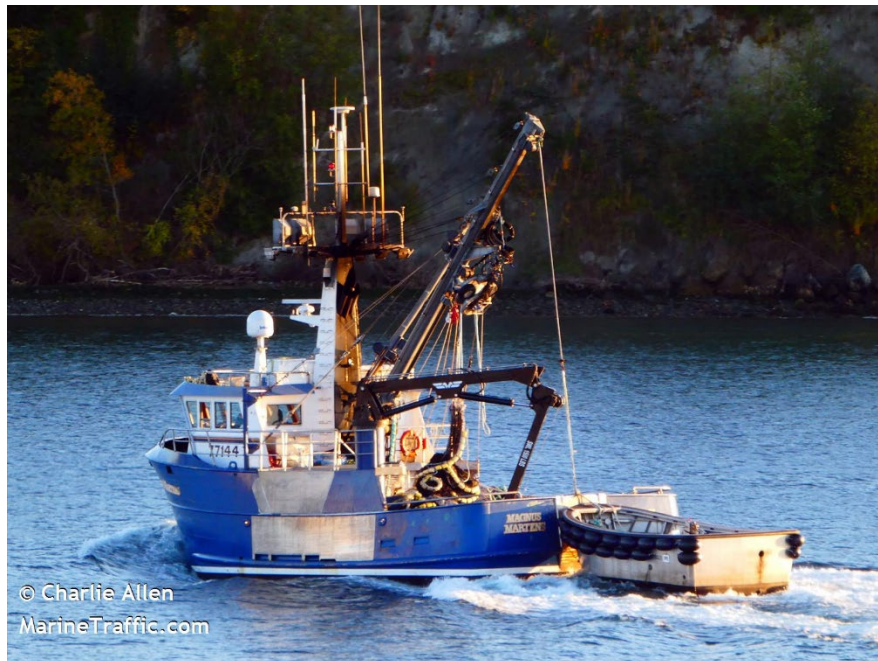


Figure 28: Design Vessel F/V Magnus Martens

Table 15. Design Vessel Dimensions (feet)

Vessel	F/V Magnus Martens
Length Over All (LOA)	58
Beam	26
Load Draft	8

The design vessel determination is heavily influenced by wave/tide conditions and other H&H considerations. Passenger counts and freight requirements are not a limiting characteristic since any vessel that can handle the marine conditions in the Akun Strait meet the passenger/freight capacity of the fixed wing. Changes in demand could impact trip counts in FWOP, but the FWP design vessel size is already minimized and is not likely to be further reduced.

### 7.3.1.1.2. Vessel Operations

This type of vessel can be expected to conduct operations in Beaufort Sea State 3 (BSS3) with a windspeed of 7 to 10 knots and a maximum wave height of 3 feet and survive in SS4 with a windspeed of 11 to 16 knots and a maximum wave height of 5 feet. Wave conditions originating from 290°- 330° and 160°- 220° would filter through the Akun straight and impact the ability of the ferry to operate for the percent of time shown in the figure below.

Table 16. Design Vessel Expected Operational Conditions

58 Foot Ferry		
Likely Operation	Possible Operation	Cease Operation
Seas under 3 feet	Seas 3 to 5 feet	Seas 5+ feet
78%	85%	15%

Note: Statistics are based on significant wave heights (approximately one-half maximum wave height) generated by WIS point 82327 and do not consider wind, fog, and maintenance that may also affect operations.

Transportation times of the ferry are estimated to take 45-50 minutes each way, plus load and unload times. Compared to 12 – 18 minutes for a helicopter trip, the trip duration of the ferry would be increased. However, this would be offset by the capacity of the ferry allowing for a single trip to transport a full fixed-wing plane load of passengers, luggage, and light freight thereby eliminating the multiple trips required by the helicopter. Due to a lack of data on existing condition delay times and uncertainty, and the offset anticipated between the trip count savings for the marine ferry, transportation and delay times are not further quantified for benefit purposes.

### 7.3.1.1.3. Vessel Operating Cost Methodology

Bristol Harbor Group, under a contract through the Marine Design Center, conducted a ferry vessel cost analysis. Under this effort, they gathered information under various scenarios including a new vessel build and an existing vessel conversion. For a 58' design vessel, the costs include an assumption of 2 crew, and a deck anti-icing system.

Table 17. Marine Ferry Cost Analysis Components

<b>Estimated Revenues from Scheduled Operations</b>	<b>Operating Expenses</b>	<b>Administrative Cost</b>	<b>Profit as a percentage of expenses</b>
Passenger Revenue	Crew Comp, Benefits & Travel	Admin Salaries incl. payroll tax	10%
Freight Revenue	Fuel & Lubes	Professional and Contracting	
Mail Revenue	Insurance P&I & H&M	Alaska Worker Compensation Est., Crew & Admin Personnel	
	Vessel Maintenance & Repair	Office Rent/HQ Allocation	
	Vessel Expense	Travel & Exp (3 times per year)	
	Crew Housing & Meal Allowance	Office Supplies	
	Dockage	Utilities	
	Equipment est.		

Source: Bristol Harbor Group Memorandum dated 07March2023

In addition, daily contract rates for existing applicable vessels were also gathered and ranged from \$3,400 to \$4,000 per day or \$1.06 to \$1.25 million per year.<sup>24</sup> Information from the Marine Design Center estimated an annual contract cost of \$1.35 million per year for an existing vessel with no conversion.

Based on this analysis, annual contract cost estimates for a 58' ferry are shown below.

Table 18. 58' Ferry Annual Total Economic Cost Estimates

	<b>58' New</b>	<b>58' Converted</b>	<b>58' Existing</b>
Operating Expense	\$1,958,951	\$1,586,725	\$1,085,716
Admin Expense	\$143,345	\$143,345	\$143,345
10% Profit on Expenses	\$210,229	\$173,007	\$122,906
<b>Total Economic Cost</b>	<b>\$2,312,525</b>	<b>\$1,903,077</b>	<b>\$1,351,967</b>

Source: Bristol Harbor Group Memorandum dated 07March2023

The 58' new vessel option was eliminated from further analysis as the converted and existing vessel options are more much likely. Ultimately, given that the ferry will be managed via an annual contract that will be available for bidding, the annual contract cost is unknown. To allow for this uncertainty, the remaining two cost scenarios (a converted vessel, and an existing vessel) form the basis for the transportation cost savings analysis throughout this study.

<sup>24</sup> Daily contract rates for Babkin Charters (58' vessel) and Mac Enterprises (Miss Alyssa 43' vessel) rcvd via personal communication with USACE staff. Annual rates estimated using 6 days per week and 52 weeks per year to mirror FWOP condition trip schedules)



### **7.3.1.2. Alaska Marine Highway System Ferry**

A focus group held in Akutan in October 2022 was asked whether their AMHS ferry usage would be impacted in any way (positively or negatively) in a FWP scenario. All respondents indicated that usage of the AMHS ferry is independent of the demand for transportation between Akutan and Akun and would remain unchanged.

### **7.3.1.3. Fixed Wing Service**

While participation in the EAS subsidy must be renewed every two years, no changes to the EAS service are anticipated under FWP conditions.

### **7.3.1.4. Maritime Aviation Helicopter**

In all future with-project alternatives, it is assumed that the helicopter service in Akutan would be eliminated and replaced with the marine ferry.

While affordability is a driving factor in the need to look at marine transportation options, there are other potential impacts to consider when investigating the removal of a helicopter from the region in FWP conditions.

During peak fishing seasons, the Coast Guard often maintains a H-60 or H-65 helicopter in Dutch Harbor or (less often) in Cold Bay. However, during the off seasons this helicopter is stationed in Kodiak. It is estimated that under a best-case scenario travel time from Kodiak to Akutan for a medivak would require six hours. In these situations, the primary medivak transportation would also shift from the helicopter (FWOP) to the marine ferry (FWP). Transportation times on the ferry are longer than the helicopter, however the ultimate impact of this increased travel time between Akutan and Akun is offset by the travel time required by the fixed-wing LifeMed. It is anticipated that for medivak purposes the overall impact of a shift from helicopter to marine ferry would be minimal.

Off season search and rescue (SAR) support operations, however, could experience negative impacts as a result of there no longer being a helicopter stationed in the region that could provide immediate assistance. In FWP, SAR operations would default to the Coast Guard with travel times varying depending upon where the nearest available helicopter is stationed and weather conditions along the route.

### **7.3.1.5. Trident Seafoods Transportation Methods**

Trident Seafoods in Akutan processes many species, but the primary species by volume and value is pollock from the Bering Sea. The Bering Sea pollock fishery is the largest sustainably certified fishery in the world. It is well managed and has never been closed to fishing. The annual catch limit varies based on abundance but is very stable. A significant decline in the short- or long-term is not anticipated.

Due to uncertainty in the future operations of the Trident Seafoods Akutan processing plant, this project is not formulated to incorporate benefits associated with transportation of plant employees.

### **7.3.2. Marine Transportation (Skiff Operations)**

In future with project conditions, it is assumed that the residents of Akutan will continue to choose to utilize their personal vessels to access Akun Island at a similar rate when compared to historical and existing conditions.

### **7.3.3. Fuel and Freight**

In FWP conditions, there is the possibility to transfer fuel more cost effectively from Akutan to Akun to support airport operations. In FWP, it is anticipated that fuel would continue to be delivered to Akutan via barge (as occurs in FWOP conditions) with fuel barrels transferred via the marine ferry rather than the helicopter. As a result of this shift, cost savings in fuel delivery fees could potentially be expected. Fuel volumes transferred to Akun for the airport generators and snow removal equipment is minimal, and any cost savings benefits would be equally captured by all FWP alternatives and therefore is not likely to impact plan selection or significantly alter NED benefit levels.

It is not anticipated that an aircraft refueling system would be installed on Akun in FWP conditions, as interviews with aircraft operators indicated that a fuel system on Akun would be very costly to install and maintain and would require testing to maintain aircraft fuel quality.

### **7.3.4. Other Social Effects**

While it can be difficult to quantify a direct link between a navigation project and improvements to the viability of a community, understanding the unique nature of remote Alaska and how transportation improvements could strengthen the resiliency of the village is critical. For example, navigation efficiency has the potential to reduce transportation cost for fuel and goods. According to the American Society for Civil Engineers Infrastructure Report Card for Alaska, “without safe and efficient access to ports and the ocean, the main regional economic driver in many of our communities is gone” (ASCE 2017).

Having affordable and dependable transportation to and from the community will allow both emergency and scheduled medical transport to occur, reducing both risks to life safety and economic costs to community members who could otherwise be impacted while attempting to access medical services in hub communities such as Anchorage and Seattle. Having reliable access to medications and medical supplies could avoid occurrences of some medical emergencies entirely.

However, there are health and safety benefits to the region by having a helicopter stationed on Akutan that could be reduced if the helicopter was no longer serving the community. According to Maritime Aviation, they are frequently involved in medivak transportation (a typical scenario would involve flying a patient from Akutan to Akun where the patient is transferred to a fixed wing ambulance.) The Coast Guard has also conducted medivaks directly from Akutan using an H-60 or H-65. During peak commercial fishing season, the Coast Guard may station a helicopter on Unalaska or Cold Bay (35 and 140 miles away) but most frequently the nearest helicopter is

stationed on Kodiak Island (575 miles away – which typically takes about 6 hours). In addition, having a helicopter stationed on Akutan provides an opportunity for medivak and Search and Rescue assistance to neighboring islands. Recently the helicopter was utilized to assist with a SAR operation on Unalaska following a tragic car accident. In a FWP scenario, the helicopter would likely be removed from Akutan and life safety transportation improvements provided by the ferry could potentially be somewhat offset by increased risks to the region associated with increases in response transportation times by the Coast Guard. However, (while not directly reflected in this analysis or the FWOP conditions assumptions) if funding for the helicopter were not sustained through the study period, not only would the helicopter be removed from the region, but there would be no effective transportation option that would help fill the gaps which would leave an even more severe situation faced in FWOP.

A summary of the OSE criteria FWOP condition, the FWP effect and the relevance to long term community viability, along with specific Section 2006 considerations are outlined in Table 19.

Table 19. Summary of Other Social Effects Criteria

Criteria	FWOP Condition	FWP Effect & Relevance to Long Term Viability	Section 2006 Considerations
<b>Health and Safety</b>	<ul style="list-style-type: none"> <li>• Medication is delivered via USPS on the helicopter. Weather cancellations can lead to multiday delays in delivery of key medicines such as insulin.</li> <li>• Medical teams come from outside to serve the community (i.e., Dental teams). When those teams are unable to access Akutan due to weather the community drops to the bottom of the waitlist.</li> <li>• Residents are transported to hub communities for specialized care. Delays in transportation can cause difficulties with off-island appointments and hotel accommodations.</li> </ul>	<ul style="list-style-type: none"> <li>• Increased reliability of access to transportation in the event of medical emergencies</li> <li>• Increased reliability in delivery of critical medicines and medical supplies</li> </ul>	<ul style="list-style-type: none"> <li>• Public health and safety of the local community, including access to facilities designed to protect public health and safety</li> <li>• Welfare of the local population</li> </ul>
<b>Subsistence</b>	<ul style="list-style-type: none"> <li>• Weather conditions can impact the ability to harvest target species (i.e. poor weather can prohibit travel during short duration salmon runs)</li> <li>• The helicopter is generally not used for subsistence harvest trips due to several reasons including weight restrictions.</li> <li>• No ability to transport ATVs to the island, which negatively impacts the ability to harvest given the significant distances between harvest sites on Akun.</li> <li>• Some residents (particularly the very young and very old that would have difficulty in a skiff, or those with limited disposable income to pay for tickets on the helicopter) have difficulty accessing traditional subsistence and cultural sites on Akun. This</li> </ul>	<ul style="list-style-type: none"> <li>• Marine vessel is capable of handling bulky deck-load cargo to support subsistence harvesting.</li> <li>• Lower cost bar to start pursuit of subsistence</li> <li>• Cultural values (sharing)</li> <li>• Health &amp; wellness (traditional foods)</li> <li>• Training of youth</li> <li>• Increased food security</li> <li>• Increased subsistence access for the very young and very old</li> <li>• Vessel access ramps for those with mobility challenges are easily obtained and installed.</li> </ul>	<ul style="list-style-type: none"> <li>• Welfare of the local population.</li> <li>• Access to natural resources for subsistence purposes</li> <li>• Social &amp; cultural value to the community</li> </ul>

	can impact the ability of elders transferring on traditional subsistence knowledge to youth.		
<b>Delivery of Non-Medical Goods</b>	<ul style="list-style-type: none"> <li>• The helicopter prioritizes people and their luggage above general mail/freight so freight delays can occur, particularly during peak travel times and when resuming flights after weather closures.</li> <li>• Both community members and the helicopter pilots indicate that mail has been lost in transport.</li> </ul>	<ul style="list-style-type: none"> <li>• Marine vessel is sufficiently large enough to transport a full planeload of passengers and freight.</li> <li>• Training of youth.</li> <li>• Professional retention.</li> <li>• Increased food security.</li> </ul>	<ul style="list-style-type: none"> <li>• Welfare of the local population</li> <li>• Local and regional economic opportunities</li> </ul>
<b>Cultural Identity (Non-Food Gathering Cultural Practices)</b>	<ul style="list-style-type: none"> <li>• Traditional village site is located on Akun, making access to the island particularly important for cultural reasons.</li> <li>• Culture camps are hosted on Akun Island, including youth from not only Akutan but also neighboring villages.</li> <li>• Non-food materials are harvested from Akun as part of cultural practices (i.e., grass for basket making).</li> </ul>	<ul style="list-style-type: none"> <li>• Access to harvests such as grasses for making baskets.</li> <li>• Increased access for Akun-based culture camps.</li> <li>• Access to historical village locations including burial sites.</li> <li>• Training of youth.</li> <li>• Mental health.</li> <li>• Cultural values (sharing).</li> </ul>	<ul style="list-style-type: none"> <li>• Welfare of the local population</li> <li>• Access to subsistence resources</li> <li>• Social &amp; cultural value to the community</li> </ul>
<b>Income Opportunities</b>	<ul style="list-style-type: none"> <li>• Limited opportunities for cash employment.</li> </ul>	<ul style="list-style-type: none"> <li>• Improved access to Akun for tourism/cattle development potential.</li> <li>• Available cash to pursue subsistence.</li> <li>• Available cash to rebuild critical infrastructure.</li> <li>• Professional retention of talent within the village.</li> <li>• Employment.</li> <li>• Health &amp; wellness (through employment).</li> </ul>	<ul style="list-style-type: none"> <li>• Local and regional economic opportunities</li> <li>• Welfare of population</li> </ul>

<b>Community Growth and Expansion</b>	<ul style="list-style-type: none"> <li>• Geography limits expansion on Akutan.</li> </ul>	<ul style="list-style-type: none"> <li>• Efficient connection between Akutan and Akun could enable expansion on Akun.</li> </ul>	<ul style="list-style-type: none"> <li>• Welfare of the local population</li> </ul>
<b>Transportation Mode Preferences</b>	<ul style="list-style-type: none"> <li>• Some community members indicated a distrust of the helicopter.</li> <li>• The helicopter can be difficult for individuals with mobility issues.</li> </ul>	<ul style="list-style-type: none"> <li>• Connection to the transportation network for those less trusting of helicopters.</li> <li>• Likely access ramp to a ferry for easier access by those with mobility issues.</li> </ul>	<ul style="list-style-type: none"> <li>• Welfare of the local population</li> </ul>
<b>Noise Pollution</b>	<ul style="list-style-type: none"> <li>• Helicopter makes repeated trips to/from the island.</li> </ul>	<ul style="list-style-type: none"> <li>• Marine vessel would eliminate rotor noise.</li> </ul>	<ul style="list-style-type: none"> <li>• Welfare of the local population</li> </ul>
<b>Local Vessel Access</b>	<ul style="list-style-type: none"> <li>• Skiffs are launched from the beach or ramp on Akutan and then tied or dragged onto the beach in Akun. Skiffs are generally not left unattended due to a lack of protected moorage areas.</li> </ul>	<ul style="list-style-type: none"> <li>• Ability to leave skiff unattended (tied or dragged on the beach) behind the breakwater.</li> <li>• Training of youth.</li> </ul>	<ul style="list-style-type: none"> <li>• Welfare of the local population.</li> <li>• Social &amp; cultural value to the community</li> <li>• Access to natural resources for subsistence purposes</li> </ul>

## 7.4. Description of NED Benefits

### 7.4.1. Transportation Cost Savings

Transportation cost savings are computed as the difference between annual contract costs for the helicopter (FWOP) and the estimated marine ferry (as described in Section 7.3.1.1.3) Contract costs are used as a proxy for transportation cost savings in this analysis but may include supplementary charges for items such as return on investment, capital recovery, etc. that are beyond the direct cost incurred for transportation services. The impact of those costs on this analysis are not significant, as they would be similarly reflected in both the helicopter and ferry contracts and would be minimized or eliminated when the differences between the two estimates are calculated for benefit purposes.

It is further assumed that the contract costs utilized are reasonable. The amounts in the FWOP condition are reflective of what is spent on those transportation services for the helicopter, the ferry contract amounts in FWP are an estimate calculated by the MDC and supported by readily available daily contract rates of similar vessels and includes a range of costs to allow for some uncertainty. Given that the transportation in Akutan is heavily subsidized, it is a reasonable assumption that the DOT would not support the subsidy rate if it included unreasonable fees or price gouging due to low competition rates.

### 7.4.2. Total Project NED Benefits

Total project NED benefits are presented in Table 20 and include a range of values to reflect uncertainty.

Table 20. NED Benefits by Alternative (Present Value)

Description	Alt 1		Alt 2		Alt 3	
	Low	High	Low	High	Low	High
Present Value Benefits	\$11,260,000	\$26,887,000	\$11,260,000	\$26,887,000	\$11,260,000	\$26,887,000
Average Annual Benefits	\$397,000	\$948,000	\$397,000	\$948,000	\$397,000	\$948,000

## 7.5. Project Costs

The USACE Alaska District cost engineers developed Rough Order of Magnitude (ROM) cost estimates for the alternatives, including those to construct and maintain facilities. The Cost Engineering Appendix (Appendix D) details the procedures and assumptions used to calculate the estimates. Cost risk contingencies were included to account for uncertain items such as dredged material disposal methods. Project costs were developed without escalation and are in 2023 dollars.

PED is expected to occur over a 30-month period. Construction is expected to occur over 3 years consisting of 3 construction seasons, each 6 months in duration, with construction complete by the end of calendar year 2032. These assumptions inform the interest during construction calculations.

Maintenance dredging and armor rock replacements of varying degrees are assumed for each alternative. H&H developed the maintenance intervals and quantities for maintenance dredging and rock replacement. Cost Engineering developed the Operations, Maintenance, Repair, Rehabilitation, and Replacement (OMRR&R) costs. Maintenance dredging consists of three components: mobilization and demobilization, dredge survey, and dredging, and vary by alternative.

As with benefit cash flows, costs are discounted/indexed to a base year and amortized to compare the average annual benefits. As such, the project first costs detailed in the Cost Engineering Appendix differ slightly from those used in the benefit-cost analysis. Costs used in the benefit-cost analysis include the project's initial cost compounded to the base year using the current discount rate, interest during construction (IDC), and estimated operations and maintenance costs. The costs for the benefit-cost analysis are referred to as NED or economic costs. The economic project costs by alternative for the benefit-cost analysis are shown in Table 21.

Table 21. Alternative Cost Estimates (Present Value)

<b>Cost Component</b>	<b>Alt 1</b>	<b>Alt 2</b>	<b>Alt 3</b>
Project First Cost	\$ 87,316,000	\$ 56,926,000	\$ 59,135,000
Interest During Construction	\$ 3,011,000	\$ 1,963,000	\$ 2,039,000
Operations and Maintenance	\$ 4,487,000	\$ 3,478,000	\$ 4,130,000
<b>Total Economic Cost</b>	<b>\$ 94,814,000</b>	<b>\$ 62,366,000</b>	<b>\$ 65,304,000</b>
<b>Average Annual Economic Cost</b>	<b>\$ 3,343,000</b>	<b>\$ 2,199,000</b>	<b>\$ 2,302,000</b>

## 7.6. Net Benefits and Benefit-Cost Ratios (BCRs)

Net benefits and the BCR are determined using the average annual benefits and average annual costs for each alternative. Net benefits are determined by subtracting the average annual costs from the average annual benefits for each alternative; the BCR is determined by dividing average annual benefits by average annual costs.



Appendix D: Economics

Table 22. NED Net Benefits and BCR's by Alternative

	<b>Alt 1</b>		<b>Alt 2</b>		<b>Alt 3</b>	
<b>Description</b>	<b>Low</b>	<b>High</b>	<b>Low</b>	<b>High</b>	<b>Low</b>	<b>High</b>
AAEQ Benefits	\$397,000	\$948,000	\$397,000	\$948,000	\$397,000	\$948,000
AAEQ Costs	\$3,343,000	\$3,343,000	\$2,199,000	\$2,199,000	\$2,302,000	\$2,302,000
<b>Net AAEQ Benefits</b>	<b>\$(2,946,000)</b>	<b>\$(2,395,000)</b>	<b>\$(1,802,000)</b>	<b>\$(1,251,000)</b>	<b>\$(1,905,000)</b>	<b>\$(1,354,000)</b>
<b>BCR</b>	<b>0.12</b>	<b>0.28</b>	<b>0.18</b>	<b>0.43</b>	<b>0.17</b>	<b>0.41</b>
<b>Most Likely (Average) BCR</b>	<b>0.20</b>		<b>0.31</b>		<b>0.29</b>	

The alternative that reasonably maximizes net benefits would typically be the recommended alternative under the NED account, particularly when the BCR is greater than 1.0 (when benefits exceed costs). In this case, no alternative has benefits exceeding costs. However, Alternative 2 has the highest net NED benefits on both the lower and upper ends of the benefits range.

### 7.7. Regional Economic Analysis

The Regional Economic Development (RED) account measures changes in the distribution of regional economic activity that would result from each alternative. Evaluations of regional effects are measured using a nationally consistent income, employment, output, and population projection. These impacts occur from the construction of the project and from the contribution to a regional economy from the functioning of the project.

The USACE Online Regional Economic System (RECONS) is a system designed to estimate regional, state, and national contributions of Federal spending associated with Civil Works and American Recovery and Reinvestment Act (ARRA) Projects. It also provides a means for estimating the forward linked benefits (stemming from effects) associated with non-Federal expenditures sustained, enabled, or generated by USACE projects. Contributions are measured in terms of economic output, jobs, earnings, and/or value-added. RECONS includes three categories of economic impacts:

- **Direct effects** are defined as expenditures made by USACE. In the impact area in which the project is located, direct effects represent the portion of expenditures that flows to material and service providers in the impact area. For employment and earnings measures, the direct effect represents the jobs associated with the work activity (e.g., onsite construction jobs).
- **Indirect effects** include the backward-linked suppliers for any goods and services used by the directly affected activities.
- **Induced effects** on the region occur from household expenditures associated with direct- and indirect-affected workers spending their income within the impact area. Economic impact measures reported are many jobs, employment earnings output (sales), and value-added (gross domestic product).

RECONS reports indirect and induced effects collectively as secondary effects. The tool was used to perform the RED analysis for the Akutan Navigation Improvements Project.

For purposes of this analysis, the Aleutians East Borough is considered the local impact area, with the state of Alaska and the nation also differentiated.

#### 7.7.1. RED - Alternative 1

The expenditures associated with All Work Activities, with Ability to Customize Impact Area and Work Activity at Aleutians East Borough (AK) are estimated to be \$87,316,000. Of this total expenditure, \$41,936,317 will be captured within the local

impact area. The remainder of the expenditures will be captured within the state impact area and the nation. These direct expenditures generate additional economic activity, often called secondary or multiplier effects. The direct and secondary impacts are measured in output, jobs, labor income, and gross regional product (value added) as summarized in the following tables. The regional economic effects are shown for the local, state, and national impact areas. In summary, the expenditures \$87,316,000 support a total of 485.8 full-time equivalent jobs, \$34,214,395 in labor income, \$31,897,724 in the gross regional product, and \$50,786,492 in economic output in the local impact area. More broadly, these expenditures support 1,417.0 full-time equivalent jobs, \$104,081,569 in labor income, \$130,847,061 in the gross regional product, and \$238,010,407 in economic output in the nation.

Table 23. Alternative 1 RED Summary

Area	Local Capture	Output	Jobs*	Labor Income	Value Added
<b>Local</b>					
Direct Impact		\$41,936,317	444.3	\$31,819,375	\$26,420,640
Secondary Impact		\$8,850,175	41.5	\$2,395,020	\$5,477,084
Total Impact	\$41,936,317	\$50,786,492	485.8	\$34,214,395	\$31,897,724
<b>State</b>					
Direct Impact		\$61,327,617	605.9	\$47,261,424	\$37,541,803
Secondary Impact		\$54,218,029	278.3	\$17,436,394	\$31,533,268
Total Impact	\$61,327,617	\$115,545,646	884.2	\$64,697,817	\$69,075,071
<b>US</b>					
Direct Impact		\$82,211,951	707.4	\$55,281,492	\$46,971,875
Secondary Impact		\$155,798,456	709.6	\$48,800,077	\$83,875,185
Total Impact	\$82,211,951	\$238,010,407	1,417.0	\$104,081,569	\$130,847,061

\* Jobs are presented in full-time equivalence (FTE)

### 7.7.2. RED - Alternative 2

The expenditures associated with All Work Activities, with Ability to Customize Impact Area and Work Activity at Aleutians East Borough (AK) are estimated to be \$56,926,000. Of this total expenditure, \$27,340,542 will be captured within the local impact area. The remainder of the expenditures will be captured within the state impact area and the nation. These direct expenditures generate additional economic activity, often called secondary or multiplier effects. The direct and secondary impacts are measured in output, jobs, labor income, and gross regional product (value added) as summarized in the following tables. The regional economic effects are shown for the local, state, and national impact areas. In summary, the expenditures \$56,926,000 support a total of 316.7 full-time equivalent jobs, \$22,306,206 in labor income, \$20,795,843 in the gross regional product, and \$33,110,448 in economic output in the

local impact area. More broadly, these expenditures support 923.8 full-time equivalent jobs, \$67,856,377 in labor income, \$85,306,242 in the gross regional product, and \$155,171,794 in economic output in the nation.

Table 24. Alternative 2 RED Summary

Area	Local Capture	Output	Jobs*	Labor Income	Value Added
<b>Local</b>					
Direct Impact		\$27,340,542	289.7	\$20,744,763	\$17,225,037
Secondary Impact		\$5,769,905	27.1	\$1,561,443	\$3,570,806
Total Impact	\$27,340,542	\$33,110,448	316.7	\$22,306,206	\$20,795,843
<b>State</b>					
Direct Impact		\$39,982,775	395.0	\$30,812,266	\$24,475,522
Secondary Impact		\$35,347,651	181.5	\$11,367,723	\$20,558,235
Total Impact	\$39,982,775	\$75,330,426	576.5	\$42,179,989	\$45,033,757
<b>US</b>					
Direct Impact		\$53,598,396	461.2	\$36,040,980	\$30,623,494
Secondary Impact		\$101,573,399	462.6	\$31,815,397	\$54,682,748
Total Impact	\$53,598,396	\$155,171,794	923.8	\$67,856,377	\$85,306,242

\* Jobs are presented in full-time equivalence (FTE)

### 7.7.3. RED - Alternative 3

The expenditures associated with All Work Activities, with Ability to Customize Impact Area and Work Activity at Aleutians East Borough (AK) are estimated to be \$59,135,000. Of this total expenditure, \$28,401,486 will be captured within the local impact area. The remainder of the expenditures will be captured within the state impact area and the nation. These direct expenditures generate additional economic activity, often called secondary or multiplier effects. The direct and secondary impacts are measured in output, jobs, labor income, and gross regional product (value added) as summarized in the following tables. The regional economic effects are shown for the local, state, and national impact areas. In summary, the expenditures \$59,135,000 support a total of 329.0 full-time equivalent jobs, \$23,171,793 in labor income, \$21,602,821 in the gross regional product, and \$34,395,291 in economic output in the local impact area. More broadly, these expenditures support 959.7 full-time equivalent jobs, \$70,489,528 in labor income, \$88,616,530 in the gross regional product, and \$161,193,199 in economic output in the nation.

Table 25. Alternative 3 RED Summary

Area	Local Capture	Output	Jobs*	Labor Income	Value Added
<b>Local</b>					
Direct Impact		\$28,401,486	300.9	\$21,549,759	\$17,893,450
Secondary Impact		\$5,993,805	28.1	\$1,622,034	\$3,709,370
Total Impact	\$28,401,486	\$34,395,291	329.0	\$23,171,793	\$21,602,821
<b>State</b>					
Direct Impact		\$41,534,297	410.4	\$32,007,929	\$25,425,289
Secondary Impact		\$36,719,308	188.5	\$11,808,845	\$21,355,992
Total Impact	\$41,534,297	\$78,253,605	598.9	\$43,816,774	\$46,781,281
<b>US</b>					
Direct Impact		\$55,678,269	479.1	\$37,439,542	\$31,811,831
Secondary Impact		\$105,514,931	480.6	\$33,049,986	\$56,804,699
Total Impact	\$55,678,269	\$161,193,199	959.7	\$70,489,528	\$88,616,530

\* Jobs are presented in full-time equivalence (FTE)

#### 7.7.4. Summary of Regional Economic Impact Analysis

Since RECONS utilizes project first costs as a basis for determining implementation outlays (construction spending) at the local, state, and national levels, those alternatives with higher construction costs will have higher RED benefits. A summary of RED benefits is shown in Table 26.

Table 26. RED National Summary by Alternative

	Local Capture	Output	Jobs*	Labor Income	Value Added
Alternative 1	\$82,211,951	\$238,010,407	1,417.0	\$104,081,569	\$130,847,061
Alternative 2	\$53,598,396	\$155,171,794	923.8	\$67,856,377	\$85,306,242
Alternative 3	\$55,678,269	\$161,193,199	959.7	\$70,489,528	\$88,616,530

\* Jobs are presented in full-time equivalence (FTE)

In addition to the effects shown above, there is potential to realize local and regional economic opportunities beyond what is captured within RECONS. The regional impact of consistent, affordable transportation into and out of the community of Akutan cannot be overstated. Without affordable access in and out of the community, the long-term viability of the community is threatened (discussed further in the OSE portions of this analysis).

Functioning infrastructure may also result in transfers of economic activity from other regions to the region where the proposed project is located due to the project efficiencies. These represent regional economic gains to the project region but may cause losses to other regions (shifting of the economic activity from one region to

another). The area of regional impacts will vary depending upon the type and scope of the project, and due to the unique nature of the transportation network and the project formulation, no significant regional transfers of economic activity are anticipated for Akutan.

## **7.8. Environmental Quality**

For each alternative plan, positive and negative benefits to the environment must be analyzed consistent with current guidance. The benefit assessment can be quantitative or qualitative and, if appropriate, monetized. The analysis must distinguish between national and regional benefits while ensuring benefits are not accounted for more than once.

The FWOP condition would result in continued air travel of Akutan Bay and Akutan Harbor by helicopter. The extent to which marine mammals and birds are affected by this are unknown, but some level of disturbance when the helicopter is low during takeoff and landing is possible.

Environmental effects, both positive and negative, are similar among all three FWP alternatives. All alternatives would place fill over existing benthic habitat and dredge adjacent benthic habitat. The area inside the breakwaters would be converted to a lower energy environment, but the areas are small overall when compared to overall costal habitat on Akun Island. Confined underwater blasting would be required for alternatives 2 and 3 which would lead to greater impacts to fish and marine mammals, although the impacts are of short duration and would be mitigated to the extent possible by timing windows and shutdown distances. All three alternatives would introduce additional vessel traffic between Akutan and Akun and this would increase underwater noise and the risk of vessel strikes to marine mammals. These potential impacts could be mitigated by observing for marine mammals and altering course and speed as required to avoid vessel strikes. All three alternatives would eliminate helicopter flights and remove this source of potential disturbance.

For additional information on environmental quality, see the environmental discussion in the main report.

## **7.9. Other Social Effects**

### **7.9.1. Cost Effectiveness/Incremental Cost Analysis (CE/ICA)**

Section 7.6 presented the NED analysis and demonstrated that there is no NED Plan. In accordance with the Section 2006 Authority, the CE/ICA is conducted to evaluate the effects of the proposed alternatives beyond the NED perspective. These effects are non-monetary outputs. The CE/ICA is utilized to inform decisions on sound investments by identifying options that yield maximum desired outputs for the least acceptable cost. The selected outputs are measured in Access Capability for the marine ferry as served by navigation improvements. This section first describes the development of the CE/ICA variables, the underlying assumptions, and Hydraulics and Hydrology (H&H) modeling

that form the basis of the outputs or metric. It then discusses the computations and CE/ICA results completed utilizing the IWR Planning Suite II tool.

#### **7.9.1.1. CE/ICA Framework**

The project objectives are to provide sustainable, safe, and reliable access to Akutan by improving key service operations such as the transportation of passengers, goods, mail, and medical supplies between the Akutan Airport on Akun Island and the community of Akutan on Akutan Island over the 50-year period of analysis. The basis of the outputs used in this CE/ICA is rooted in those planning objectives.

Access Capability directly impacts waterborne transportation for Akutan, particularly given the integral significance that the ability to access their airport is to the long-term viability of the community. This metric was chosen rather than Access Days due to the varying factors such as transportation of people, freight, and mail; the complexity involved in coordinating fixed wing flights between Unalaska and Akun with transportation between Akun and Akutan (via FWOP helicopter or FWP ferry), along with additional considerations such as safety (including delivery of essential medications and medivaks) and subsistence (ability to access current resources and benefits associated with FWP alternative sites). A metric encompassing all factors was critical in order for the OSE analysis to reflect the complexity of FWOP and FWP conditions. Therefore, the optimal metric for the CE/ICA is Access Capability. The CE/ICA metric compares the accessibility between the proposed alternative plans and the No Action plan.

The Engineer Regulation 1105-2-100 states the following:

Selecting the National Ecosystem Restoration (NER) plan requires careful consideration of the plan that meets planning objectives and constraints and reasonably maximizes environmental benefits while passing tests of cost effectiveness and incremental cost analyses, significance of outputs, acceptability, completeness, efficiency, and effectiveness.

While the above regulation refers to NER and environmental benefits, it is the same guiding principle for the OSE benefits under which this study is authorized. As such, the development and application of the CE/ICA tools to determine the recommended plan comply with the above guidelines.

The Alaska District H&H collaborated with Economics, Planning, and Project Management on the development of the model metric and model input.

#### **7.9.1.2. Variable Descriptions**

The CE/ICA is performed on Planning Suite II using two variables. First is the non-monetary outputs, and the second variable is the costs for the alternative plans. The non-monetary outputs are measured in Access Capability. In this report, the terms output and metric are interchangeable.

Access Capability is defined as percentage of time that the design vessel (marine ferry) can safely access and moor at the proposed navigation improvements. Access Capability is the non-monetary metric used in this CE/ICA. Safe access represents the percentage of time that the wave and water level conditions meet the safety requirements for the design vessel for each alternative.

Safe access is based on wave and water level conditions at the proposed alternatives and is controlled by the safe operating conditions for the design vessel. The H&H Appendix (Appendix A) details the methodology used to determine the wave and water level conditions. Hindcast wind and wave data was used to estimate the percent of time that the wave conditions at the sites and the entrance of the proposed navigation improvements would have exceeded the safe operating conditions of the design vessel. Transportation to and from the airport occurs year-round for Akutan, and marine accessibility for the airport is similarly evaluated annually.

For purposes of this analysis, the baseline FWOP Access Capability (estimated at 0.70 for the helicopter, see Section 5.1.2.3 for more information) is subtracted from the FWP Ferry Access Capability at each alternative. See Table 27 for additional information.

Table 27. Access Capability Metric

<b>Alternative</b>	<b>Total Access Capability</b>	<b>Access Capability above FWOP</b>
Alternative 1	0.78	0.08
Alternative 2	0.78	0.08
Alternative 3	0.71	0.01

As noted in the Planning Guidance Notebook, the cost-effectiveness analysis evaluates a plan’s level of outputs against its cost. The subsequent incremental cost analysis evaluates a variety of alternatives of different scales to arrive at a “Best Buy” option. Best Buy plans are considered most efficient, which provide the greatest increase in output for the least increase in cost. These analyses help to inform whether or not the next unit of benefit is “worth it”. The costs variable for a CE/ICA refer to the average annual economic costs (AAEQ) of each alternative. These costs include project first costs, interest during construction, and operation and maintenance costs. The costs are amortized using the federal discount rate for FY23 over the period of analysis. The annual average costs used in the CE/ICA is summarized in Table 28.

Table 28. Average Annual Costs for CE/ICA by Alternative

<b>Cost Component</b>	<b>Alt 1</b>	<b>Alt 2</b>	<b>Alt 3</b>
Project First Cost	\$ 87,316,000	\$ 56,926,000	\$ 59,134,000
Interest During Construction	\$ 3,011,000	\$ 1,963,000	\$ 2,039,000
Operations and Maintenance	\$ 4,487,000	\$ 3,478,000	\$ 4,130,000
<b>Total Economic Cost</b>	<b>\$ 94,814,000</b>	<b>\$ 62,367,000</b>	<b>\$ 65,303,000</b>
<b>Average Annual Economic Cost</b>	<b>\$3,343,000</b>	<b>\$2,199,000</b>	<b>\$2,302,000</b>



**7.9.1.3. CE/ICA Calculations and Results**

The CE/ICA consists of four steps. The first is to estimate the average annual benefits of each alternative. These average annual benefits are the non-monetary units measured through the access capability metric. The second step is to estimate the average annual equivalent costs of the alternative plans. The first two steps are completed in the previous subsections. The third and fourth steps use the IWR Planning Suite II software to identify cost-effective plans and estimate incremental cost outputs, respectively.

**7.9.1.3.1. Cost Effectiveness**

The cost-effective analysis results showed Alternative 2 is cost-effective. The incremental cost analysis yielded that the No Action (FWOP) and Alternative 2 are the only Best Buy (most efficient) plans. A summary of the CE/ICA variables and the cost-effectiveness analysis results are shown in Table 29.

Table 29. CE/ICA Results Summary

<b>Alternative</b>	<b>Access Capability</b>	<b>Average Annual NED Cost (\$1000)</b>	<b>Average Annual Cost per Unit of Access Capability (\$1000/Access Capability)</b>	<b>Cost-Effective</b>
No Action (FWOP)	0.00	\$ 0	\$ 0	Best Buy
Alt 1	0.08	\$ 3,343	\$ 41,787.50	Non-Cost Effective
Alt 2	0.08	\$ 2,199	\$ 27,487.50	Best Buy
Alt 3	0.01	\$ 2,302	\$ 230,200.00	Non-Cost Effective

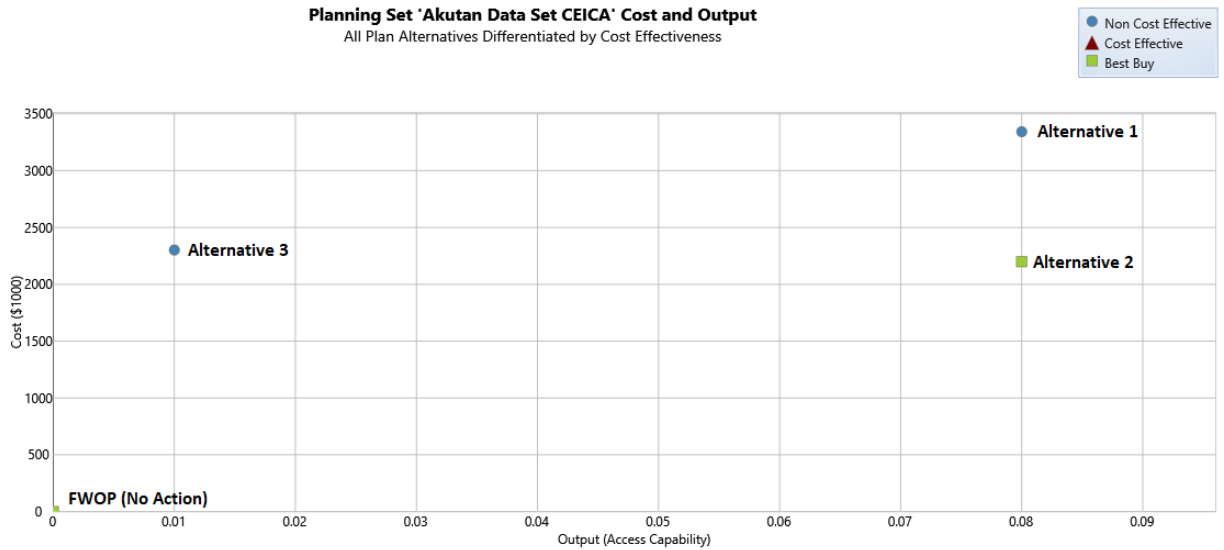


Figure 29: Alternatives Differentiated by Cost-Effectiveness

Figure 29 illustrates the CE/ICA concept well. Cost effectiveness analysis is conducted to ensure that the least cost plan alternative is identified for each possible level of environmental output; and that for any level of investment, the maximum level of output is identified. In Figure 29, it can be seen that when comparing Alternative 1 and Alternative 2, both provide the same level of Access Capability but Alternative 2 does so at a lesser cost. When comparing Alternative 2 and Alternative 3, it can be seen that Alternative 2 outperforms Alternative 3 both by having a lesser cost and by having a higher level of Access Capability. The No Action (FWOP) is always considered cost effective since it also meets the criteria of being the least cost (\$0) plan for the given level of output (which is also zero). As no other alternative provides greater benefits at a lesser cost, Alternative 2 and No Action (FWOP) are the two Cost Effective and Best Buy plans.

#### 7.9.1.3.2. Incremental Cost Analysis

The Incremental Cost Analysis is performed by determining the incremental cost per unit between successively larger Best Buy plan alternatives, which helps answer the question of whether the next unit of benefit is “worth it”. The Cost-Effective Analysis identifies the No Action (FWOP) and Alternative 2 as the two Best Buy plans to be compared by the incremental cost analysis. The Incremental Cost Box Graph in Figure 30 displays the Best Buy plan comparisons resulting from the incremental cost analysis and the incremental cost per unit for Access Capability provided by Alternative 2, as there is no incremental cost or output for No Action.

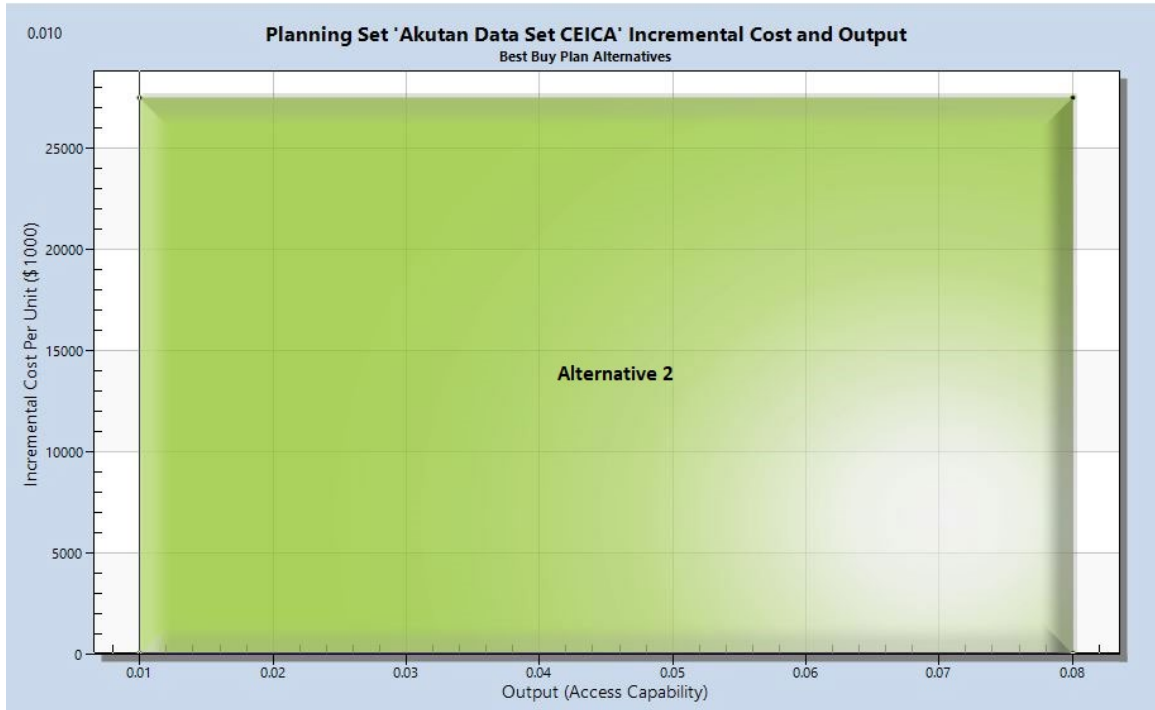


Figure 30: Incremental Cost Analysis of Best Buy Plans

The gain in access capability (i.e., non-monetary outputs) relative to the increase in cost for each alternative is shown in Table 30.

Table 30. Best Buy Plan Incremental Cost Analysis

Alternative	Access Capability (Output)	Incremental Cost (\$1000)	Incremental Output	Incremental Cost per Output
No Action (FWOP)	0.00	0	0.00	\$ 0
Alt 1	0.08	1,041	0.07	\$ 14,841.43
Alt 2	0.08	-1,144	0.00	\$ 0
Alt 3	0.01	2,302	0.01	\$ 230,200.00

### 7.9.2. Multi-Criteria Decision Analysis (MCDA)

While Access Capability is the optimal metric representing the opportunity for safe access at each alternative plan, the metric alone inadvertently assumes all alternatives provide a uniform level of benefits for that access. By this assumption, the nuances of benefits and their contribution to community viability are not fully captured within that metric. The Multiple Criteria Decision Analysis (MCDA) is used to account for these OSE benefit intricacies. The specific OSE metrics which impact community viability are described in detail and qualitatively discussed in Section 5.3, Section 6.6, and Section 7.3.4.

Multicriteria decision analysis has great value for providing a method and structure for informed discussions of the relevant conflicts and values between potential alternatives. MCDA is a decision aiding tool and allows for clarification and conveyance of tradeoffs across alternatives (CDM Smith, 2017). It can serve to demonstrate that the final decision is informed through a rational process fully cognizant of stakeholders' criteria (Trade-Off Analysis Planning and Procedures Guidebook, IWR 02-R-2), and it is important to understand that MDCA is a decision-making aid, not a decision in itself.

The selection of criteria for the MCDA is based on key benefits that support community viability and meet the planning objectives. As discussed in Section 5.3, Section 6.6, and Section 7.3.4, these criteria were formulated throughout the study process and then vetted and revised during a community focus group consisting of key stakeholders. Table 31 presents the OSE criteria selected for the MCDA.

Table 31. MCDA OSE Criteria

Criteria 1	Health and Safety
Criteria 2	Subsistence
Criteria 3	Delivery of Essential Non-Medical Goods
Criteria 4	Cultural Identity (non-food gathering cultural practices)
Criteria 5	Income Opportunities
Criteria 6	Community Growth/Expansion
Criteria 7	Transportation Mode Preferences
Criteria 8	Noise Pollution
Criteria 9	Local Vessel Access

### **7.9.2.1. Assigned Quantitative Values**

The MCDA follows the methodology set out in the IWR Planning Suite II User Guide (CDM Smith, 2017). Weighted Scoring is utilized as the ranking method for this analysis as it is simple, intuitive, and the most commonly used method. Under weighted scoring, qualitative criteria such as those presented in the preceding Table 31 are each assigned a quantitative score (by alternative) and weight (by criteria). Each criterion represents a measured quantity in the MCDA decision matrix.

MCDA involves optimizing criteria, whereby the minimization of undesirable effects and maximization of desirable effects are considered. Since the selected criteria represents a benefit that supports community viability, a maximization of each criterion is considered favorable.

It is acknowledged that assigning values to criteria has some limitations, for example a Medium ranking is almost twice that for the Low ranking. However, for the level of analysis for the MCDA, it was determined that ranking values by the focus group was appropriate.

Alternative sites were utilized for the MCDA scoring rather than alternatives in this case. This was done for two reasons. First, it was determined that sites would be the primary driver for differences between scores of alternatives. Second, scoring the potential

alternative sites rather than specific alternatives enables the outputs from the focus group to remain valid even if alternative designs are subsequently optimized.

Each focus group participant conducted scoring of each criterion from 1 to 10 (with 1 being the lowest, and 10 being the highest) based on the individual’s best knowledge of the conditions and how well the proposed site would meet the planning objectives. The criteria rankings clarify the incremental benefits of Access Capability across alternatives. Additional information on criteria scores is included in Table 32.

Table 32. MCDA Criteria Scores

Criteria #	Description	Total Score by Criteria			
		FWOP	Alternative 1	Alternative 2	Alternative 3
Criteria 1	Health and Safety	78	89	89	26
Criteria 2	Subsistence	49	70	70	28
Criteria 3	Delivery of Essential Non-Medical Goods	70	89	89	38
Criteria 4	Cultural Identity (non-food gathering cultural practices)	49	77	77	31
Criteria 5	Income Opportunities	47	82	82	26
Criteria 6	Community Growth/Expansion	45	79	79	32
Criteria 7	Transportation Mode Preferences	62	87	87	28
Criteria 8	Noise Pollution	20	44	44	27
Criteria 9	Local Vessel Access	38	73	73	41

Not all criteria are equally important to the decision. With criteria defined and scored, each was then individually weighted (from low to high) based on the focus group participants best knowledge of the conditions and how important each criterion is to community viability.

Following the focus group, the criteria were then transformed numerically using the following: low equal to a weight of 1, medium-low equal to 2, medium equal to 3, medium-high equal to 4, and high equal to 5. These numerical weights were then summed and averaged to determine a weight for each criterion. Additional information on criteria weights is included in Table 33.

Table 33. MCDA Criteria Weights

Criteria #	Description	Criteria Weight (1 = low, 5 = high)	Criteria Rank (by Importance)
Criteria 1	Health and Safety	5.00	1
Criteria 2	Subsistence	4.78	2
Criteria 3	Delivery of Essential Non-Medical Goods	4.00	4
Criteria 4	Cultural Identity (non-food gathering cultural practices)	4.00	4
Criteria 5	Income Opportunities	3.78	6
Criteria 6	Community Growth/Expansion	3.44	8
Criteria 7	Transportation Mode Preferences	3.78	6
Criteria 8	Noise Pollution	1.78	9
Criteria 9	Local Vessel Access	4.22	3

### 7.9.2.2. MCDA Ranking Results

For purposes of the MCDA, the score for criteria was calculated as the change from FWOP to FWP for alternative. The two criteria that were previously utilized in the CE/ICA (Access Capability and AAEQ Cost) are also included for the MCDA.

The MCDA aims to support and unpack the complexities within the single metric of access capability. Weights and scores were analyzed within the MCDA module of the IWR Planning Suite II software utilizing weighting scoring by range (as recommended within the IWR Planning Suite users guide). Utilizing this technique, for this portion of the analysis the tool assigns the poorest performance of each criterion a value of zero. Given the desire to minimize cost, for this analysis the poorest performance for the cost criteria is the highest cost plan (Alternative 1) and it is therefore assigned a zero value. Given the desire to maximize all other criteria, for this analysis the poorest performance (lowest scores) across all other criteria is Alternative 3 and therefore they are given zero values. Figure 31 shows the MCDA criteria outputs by Alternative, and the subsequent alternative rankings.

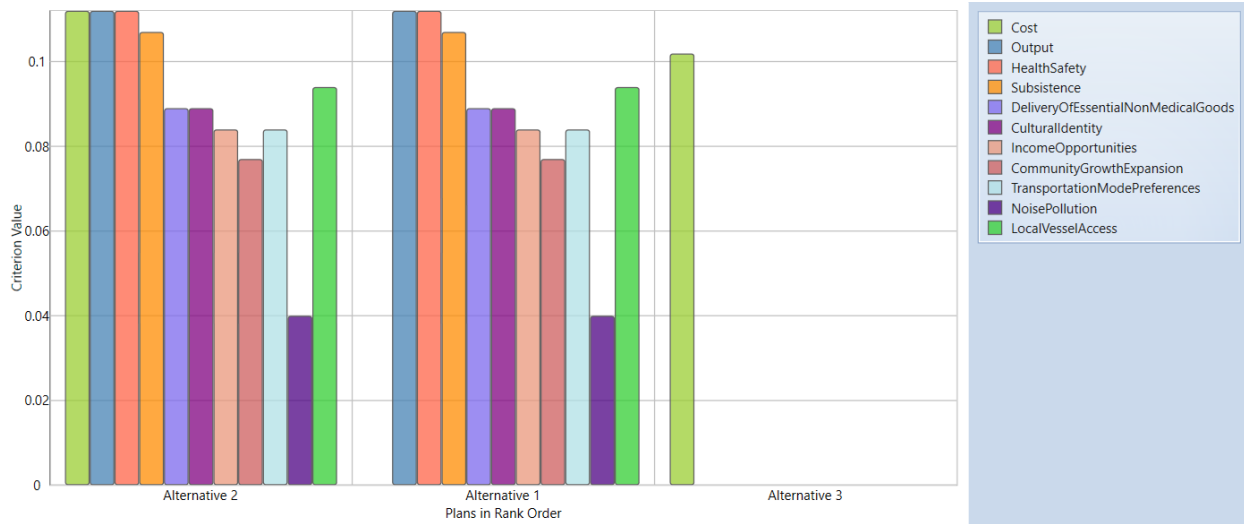


Figure 31: MDCA Criterion Weighted Scoring by Range Outputs by Alternative

Alternative 2 scores highest in the MCDA analysis, with Alternative 1 following close behind and Alternative 3 a distant third. The alternative plan scores are normalized by range, with each score varying from 0 to 1. See Figure 32 and Table 34 for additional information.

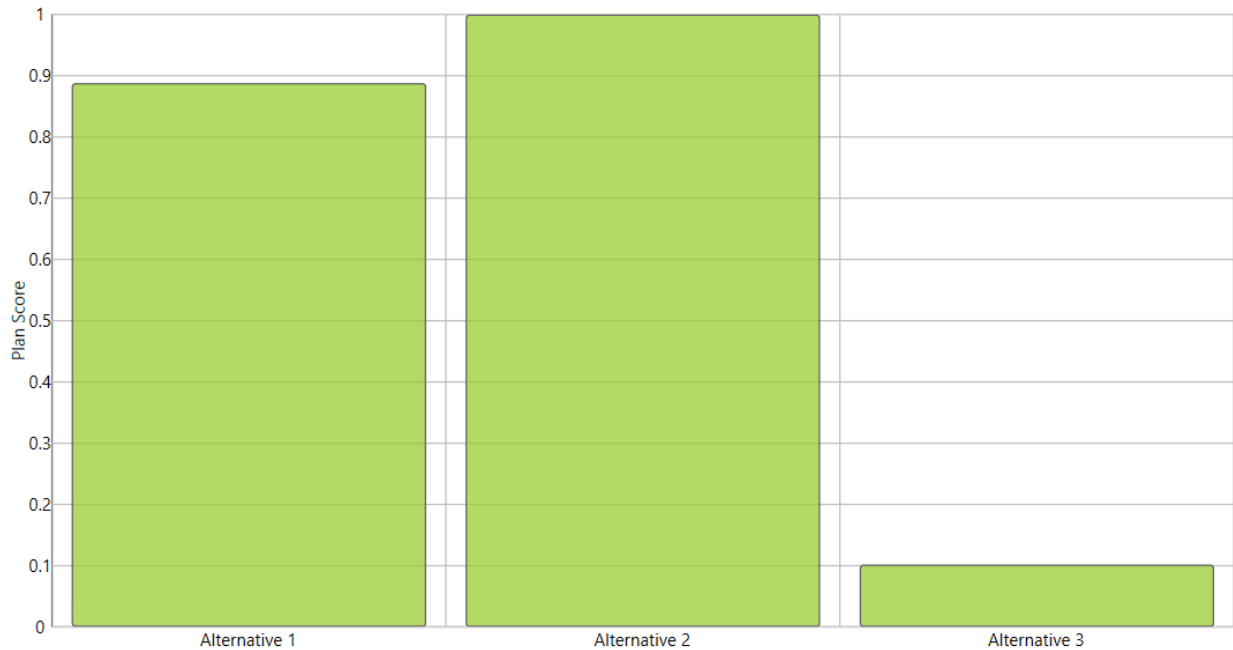


Figure 32: MDCA Plan Outputs by Alternative

Table 34. MCDA Scored Values by Alternative

Alternative	MCDA Score	MCDA Rank
Alt 1	0.888	2
Alt 2	1.000	1
Alt 3	0.102	3

## 7.10. Summary of Future With-Project Conditions

Absent federal action to provide navigation improvements to Akutan, transportation cost inefficiencies and negative impacts to OSE are expected to continue throughout the analysis. These adverse impacts are incurred as a result of current and expected future conditions. In all Future With-Project Alternatives, a marine ferry contract would replace the helicopter with a transportation cost savings of \$397,000 to \$948,000 annually.

A key point of uncertainty is the future of the Trident Seafoods plant in Akutan. Due to this uncertainty, the population of transient workers that service the plant are not considered as part of this analysis. However, if Trident Seafoods were to cease operations in Akutan the fish tax would no longer be received by the community or the Aleutians East Borough, making the transportation cost savings between the helicopter and marine ferry service contracts even more critical.

Remote Alaska communities face significant challenges. Higher costs of living, limited cash employment, and unreliable and expensive transportation are challenges the village already faces daily. In the event that Trident ceased operations in the community, these challenges would only intensify. In this scenario, the already significant OSE benefits associated with the FWP would become increasingly critical for long term viability of the community.

Each alternative provides varying degrees of improvement as described throughout Section 7.0. Alternative 2 provides the greatest increase in benefits when the benefits across all four economic accounts are looked at comprehensively.

## 8.0 RISK, UNCERTAINTY AND SENSITIVITY

### 8.1. Design Vessel

While the PDT has made informed decisions regarding selection of a design vessel, ultimately the vessel that would provide ferry services would be determined by which contractors are interested in bidding on a ferry service contract and which vessels they have access to. To help account for this uncertainty, the contract cost that is the foundation of the transportation cost reduction analysis includes a range of potential contract fees as informed by the Marine Design Center ferry analysis.

For additional information on design vessel uncertainty see the H&H appendix and main report.



## 8.2. Project Benefits

The FWOP and FWP conditions for this study have been formulated based on the permanent resident population of the village of Akutan, rather than incorporating the transient population of Trident, due to significant uncertainty regarding the future of the Trident Seafoods processing plant in Akutan. While the primary mode of transportation of Trident workers in the existing condition is tramper vessels to/from Unalaska Dutch, if Trident were to shift its plant to Unalaska Dutch Harbor, as is currently being explored, transportation demand associated with the plant would similarly be reduced in both FWOP and FWP conditions. If a shift like this were to occur, there is likelihood that the frequency of trips for both the helicopter (FWOP) and marine ferry (FWP) would similarly be reduced and subsequently lessen the estimated cost for an annual contract of each method. The impact of this reduction in trip count would likely be a lessening of NED benefits (as the difference between a FWOP and FWP annual transportation contract cost would be lessened if trip counts and subsequently annual contract rates for each service method were lessened) it is not expected to impact alternative recommendation.

Contract costs for the helicopter (FWOP) and marine ferry (FWP) form the basis for the transportation cost savings benefit and are considered reasonable for this purpose. These contract costs are likely to include return on investment and other cost components not directly tied to the transportation services, however the impact of these costs to the benefit calculation is minimal as they would be included in both the helicopter and marine ferry contract costs and would be minimized or eliminated during the benefit comparison (cancelled out). Additionally, given that the transportation in Akutan is heavily subsidized, it is a reasonable assumption that the DOT would not support the existing subsidy rate if it included unreasonable fees due to things like ROI or price gouging due to low competition rates.

In a scenario where Trident were to shift operations from Akutan to Unalaska Dutch, the fish tax base resulting from plant operations would shift from the Aleutians East Borough to the Aleutians West Borough. A loss of both an economic driver for the community of Akutan, and an income source to the AEB, would make affordable and reliable transportation for the village of Akutan even more critical. Under a FWOP condition scenario where Trident shifted operations out of Akutan, the village would be facing all the previously discussed losses along with an annual contract for helicopter operations that is costly even under the existing conditions. The OSE benefits associated with a marine ferry would become even more impactful to the community in this scenario and support long term community viability to an even greater degree. While this shift in operations is not likely to impact alternative plan selection, it would be likely to lead to an even stronger OSE justification than would be expected if Trident were to maintain operations in the community.

### **8.3. Project Depth/Optimization**

Project depth was formulated to accommodate wave/tide conditions and the design vessel. Depth can be optimized throughout the study process, but the impact of this uncertainty would be expected to be similarly borne by the full suite of alternatives and is unlikely to impact plan selection. The project depth and design are expected to continue to be optimized during PED.

## **9.0 FOUR ACCOUNTS EVALUATION SUMMARY**

This appendix presented the economic analysis of three alternatives for providing navigation improvements at Akutan, Alaska. The alternatives were evaluated using the four accounts established in the Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies: National Economic Development (NED), Regional Economic Development (RED), Environmental Quality (EQ), and Other Social Effects (OSE).

Consistent with Section 2006 of WRDA 2007 – Remote and Subsistence Harbors, as amended, a NED analysis was performed, which demonstrated that none of the alternatives had a benefit-cost ratio (BCR) greater than 1.0. Since there was no NED plan, Cost Effectiveness and Incremental Cost Analysis (CE/ICA) was used to inform plan selection. Additionally, the Multiple Criteria Decision Analysis (MCDA) tool was used to aid in capturing the incremental value of the CE/ICA metric of Access Capability. Economic risks and uncertainties were identified and discussed to support risk-informed planning and decision-making under uncertainty.

Alternative 2 had the highest average annual net NED benefits, however the BCR is below 1.0. The No Action and Alternative 2 were identified as Best Buy plans through the CE/ICA, meaning Alternative 2 provides the greatest increase in output for the least increase in cost. The results of the MCDA similarly pointed to Alternative 2 as the best option. The CE/ICA with the MCDA for OSE benefits demonstrate how the proposed alternatives support Akutan's long-term viability. For additional information see Table 35. These analyses inform plan selection as detailed in the Draft Integrated Feasibility Report.

Table 35. Four Accounts Evaluation Summary

Alternative	Benefit-Cost Ratio	AAEQ Net NED Benefits	EQ	RED	OSE (CE/ICA results, MCDA Rank)	
					Best Buy	NA
No Action (FWOP)	0.00	\$ 0	Neutral	Neutral	Best Buy	NA
Alt 1	0.12 to 0.28	\$(2,946,000) - \$(2,395,000)	Neutral	Increased employment and income for the region and state	Non-Cost Effective	2
Alt 2	0.18 to 0.43	\$(1,802,000) - \$(1,251,000)	Neutral	Increased employment and income for the region and state	Best Buy	1
Alt 3	0.17 to 0.41	\$(1,905,000) - \$(1,354,000)	Neutral	Increased employment and income for the region and state	Non-Cost Effective	3

### 9.1. Comprehensive Documentation of Benefits Policy Directive Requirements

Consistent with the 5 January 2021 Policy Directive on Comprehensive Documentation of Benefits in Decision Document, each study must include, at a minimum, the following plans in the final array of alternatives for evaluation:

1. The “No Action” alternative.
2. A plan that maximizes net total benefits across all benefit categories.
3. A plan that maximizes net benefits consistent with the study purpose.
4. For flood-risk management studies, a nonstructural plan, which includes modified floodplain management practices, elevation, relocation, buyout/acquisition, dry flood proofing and wet flood proofing.
5. A locally preferred plan, if requested by a non-federal partner, if not one of the aforementioned plans.

For Akutan, a “No Action” alternative is included so the first requirement is met. Additionally, the same plan (Alternative 2) meets the criteria for both item two and item three in the guidance. The fourth and fifth criteria do not currently apply as this is not a flood-risk management study and the sponsor has expressed support for Alternative 2.

# CWA 401 Water Quality Certification Request

version 1.25

(Submission #: HPZ-GAZB-EK2CG, version 1)

Digitally signed by:  
dec.alaska.gov  
Date: 2023.11.28 16:40:02 -09:00  
Reason: Submission Data  
Location: State of Alaska

## Details

---

**Site:** Akutan Harbor

**Submission ID** HPZ-GAZB-EK2CG

## Form Input

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### Form Instructions

Instructions for filling out the 401 Certification Form are located on the Alaska DEC website at the link below.

[401 Certification Form Instructions](#)

### Contact Information (1 of 3)

#### Required Contacts

---

The following contacts are required for this application. Multiple roles may be selected per contact.

- Applicant (Responsible Party)
- Billing contact

#### Contact Role(s)

Application Preparer

#### Contact

**Prefix**

NONE PROVIDED

**First Name    Last Name**

Christoper    Hoffman

**Title**

Biologist/NEPA Coordinator

**Organization Name**

USACE

**Phone Type    Number    Extension**

Business    9077535524

**Email**

Christopher.a.hoffman@usace.army.mil

**Mailing Address**

CEPOA-PMC-E (Christopher Hoffman)

P.O. Box 6898

JBER, AK 99506

### Contact Information (2 of 3)

## Required Contacts

---

The following contacts are required for this application. Multiple roles may be selected per contact.

- Applicant (Responsible Party)
- Billing contact

### Contact Role(s)

Applicant  
Agent  
Billing Contact

### Contact

**Prefix**

*NONE PROVIDED*

**First Name    Last Name**

Christopher    *Hoffman*

**Title**

*Biologist/NEPA Coordinator*

**Organization Name**

*USACE*

**Phone Type    Number    Extension**

Business    9077535524

**Email**

Christopher.a.hoffman@usace.army.mil

**Mailing Address**

CEPOA-PMC-E (Christopher Hoffman)

P.O. Box 6898

JBER, AK 99506

## Contact Information (3 of 3)

### Required Contacts

---

The following contacts are required for this application. Multiple roles may be selected per contact.

- Applicant (Responsible Party)
- Billing contact

### Contact Role(s)

Application Preparer

## Contact

**Prefix**

NONE PROVIDED

**First Name      Last Name**

Christopher      Hoffman

**Title**

Biologist/NEPA Coordinator

**Organization Name**

USACE

**Phone Type      Number      Extension**

Business      9077535524

**Email**

Christopher.a.hoffman@usace.army.mil

**Mailing Address**

CEPOA-PMC-E (Christopher Hoffman)

P.O. Box 6898

JBER, AK 99506

## Facility Information

### Identify the applicable federal license or permit

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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)

**Permit License Number (eg. POA-XXXX-XXXX)**

NONE PROVIDED

**Federal Agency**

Army Corps of Engineers (USACE)

### Project Information

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**Project Name or Title**

Akutan Harbor

**Project Address**

[NO STREET ADDRESS SPECIFIED]

Akun, AK 99553

**What is the land use designated as?**

Federal

Visit the link below to help with conversion between DMS and Latitude/Longitude

[DSM - Lat/Long converter](#)

**Project Location**

54.14685729547455,-165.6234403689384

, Akun, AK

Visit the link if you need to convert the lat/long to get the PLSS information.

[Converter for Township and Range](#)

**PLSS Location (Public Land Survey System)**

Borough/Municipality	Meridian	Section	Township	Range
Aleutians East Borough	Seward	1	70S	111W

**Directions to Site**

The project site requires transportation by small aircraft, helicopter, or marine vessel, typically from Unalaska, Alaska, west of Akun Island.

**Nature of Activity (Description of project, include all features)**

The project intends to create a protected moorage for a ferry vessel that will transport people and cargo between the community of Akutan and its airfield on Akun Island. The recommended plan includes construction of a harbor in Surf Bay consisting of a 450-foot-long rubble-mound breakwater; a 120-foot by 120-foot mooring basin; and a -13-foot MLLW deep entrance channel. Also included in the project are a mooring basin and dolphins, pile-supported dock, a small pad for parking and freight loading/unloading, and a road connecting the pad to an area near the Surf Bay Inn.

**Project Purpose (Describe the reason(s) for discharge)**

The purpose is to identify feasible navigational improvements that provide for the safe, reliable, and efficient (cost-effective) transportation of passengers and cargo between the Akutan Airport on Akun Island and community of Akutan located on Akutan Island.

**Discharge Information**

**For fill material, identify the material source**

On-island Sources (Temporary construction pad) & Established Quarry (Project-constructed breakwater)

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

Type	Cubic Yards
Terrestrial fill (coarse sand and gravel from on-island sources)	115,000
Quarry Rock (C-rock B-rock and armor stone)	14,000
Aggregate material (constructed upland road)	45,000

**Surface area in acres of wetlands or other waters filled**

Surface Area	Units
1.6018595	Acres

**Is this a linear project?**

No

**Is dredging involved?**

Yes

**How many acres?**

1.12029385

**How much volume? (cubic Yards)**

9,840.00

**Is the dredging considered a new project, or maintenance?**

New Project

**Proposed Placement of dredged material**

Upland

**Placement of Dredged Material**

54.147579,-165.609258

**Has a Tier analysis been conducted of the dredged prism?**

No

Note, If marked no, this may later be required upon review of request. (for example of Tier analysis, see the below links)

EPA Inland Testing Manual

<https://www.epa.gov/cwa-404/inland-testing-manual-under-cwa-section-404>

or

**Is any portion of the work already complete?**

No

**Identify the location and nature of any potential discharge that may result from the proposed project and the location of receiving waters**

---

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.

**Waterbody Name (Unnamed Wetlands - Not Allowed)**

Surf Bay

**Location of potential discharge (Decimal Degrees, 6 places), describe if necessary**

#	Activity	Description	Receiving Waterbody Name	Longitude	Latitude
1.	Dredge	Dredging Activities to develop the harbor turning basin, navigation channel, and a construction access channel.	Surf Bay	-165.616821	54.148983
2.	Fill	Breakwater	Surf Bay	-165.616821	54.148983
3.	Fill	Temporary construction pad	Surf Bay	-165.616821	54.148983

**Is the project within 1,500 feet of a known contaminated site?**

No

**Parameter(s) of Concern**

---

Identify the parameters of concern that may be present in your discharge. Consider if other parameters may be present from past activities in the area.

**Parameter(s)**

Turbidity

**Describe if known 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**

Placement of rock for the breakwater and constructed uplands is not expected to significantly increase turbidity in the project area, as the substrate contains little in the way of fine particles to be disturbed. Rock and fill material would contain residual fines that may become suspended in the water column and contribute minimally to turbidity.

**Impaired Waters**

---

See the link below for the most recently approved report and category listings.

<https://dec.alaska.gov/water/water-quality/integrated-report/>

**Does a discharge of any parameter identified above occur to an impaired waterbody 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?**

No

**i** 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).

**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**

Community services provided  
 Public health or safety improvements  
 Recreational opportunities  
 Cultural amenities

**Economic Importance Analysis**

Access to recourses  
 Commercial activities  
 Access to a transportation network

**Describe**

The proposed project may be a benefit to the public health and safety of an economically disadvantaged community by increasing access to natural resources for subsistence purposes, increasing local and regional economic opportunities, increasing welfare of the local population, and adding social and cultural value to the community.

**Description of Social or Economic Importance, if needed**

[Appendix C\\_Economics\\_Akutan Draft.pdf - 11/28/2023 12:30 PM](#)

**Comment**

The is Appendix C of the Integrated Feasibility Report and EA Draft that has been released for public and agency review.

**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**

Temporary fill would be removed along with the existing bottom to the project depth after blasting is complete. Furthermore, the energetic wave environment and exposure of Surf Bay to tides and currents would rapidly dissipate any suspended sediments from road construction, fill placement, drilling, blasting, and dredging. An effective stormwater pollution prevention plan would be implemented to greatly reduce such impacts as well.

**Have you been working with anyone in the Army Corps of Engineers (USACE)**

Yes

**USACE Contact**

<b>First Name</b>	<b>Last Name</b>	
Christoper	Hoffman	
<b>Phone Type</b>	<b>Number</b>	<b>Extension</b>
Business	9077535524	
<b>Email</b>		
Christopher.a.hoffman@usace.army.mil		

**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
SHPO	Finding of Effect Concurrence	TBD	6/17/2023	NONE PROVIDED	NONE PROVIDED
NMFS/USFWS	IHA/LOA Authorization	TBD	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
NMFS/USFWS	ESA Section 7 Concurrence	TBD	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED

\*Would include but is not restricted to zoning, building, and flood plain permits.

**Addresses of Adjoining Property Owners, Lessees, Etc. Whose Property Adjoins the Waterbody**

#	Name	Address	City	State	Zip
1.	AK DOT & PF	4111 Aviation Drive	Anchorage	Alaska	99502

**Attachments**

**Include documentation that is listed as required below**

Other: Draft Integrated Feasibility Report (without Appendices) and Prefiling Request

Required: Figures and/or Drawings/Plan Sets

Tier Analysis of dredged material

**Copy of Federal Application (USACE)**

[404\(b\)\(1\) Evaluation of Akutan Harbor.pdf - 11/28/2023 12:34 PM](#)

**Comment**

NONE PROVIDED

**Figures and/or Drawings/Plan Sets**

[Concept Design.pdf - 11/28/2023 12:32 PM](#)

**Comment**

In feasibility stage only a concept is developed.

**Document Attachments**

[Draft Akutan Feasibility Report.pdf - 11/28/2023 12:33 PM](#)

[Prefiling Request.pdf - 11/28/2023 12:35 PM](#)

**Comment**

Appendices available upon request. Tier 1 analysis was captured throughout the CWA Section 404(b)(1) evaluation and Draft Akutan Feasibility Report indicated material would likely be suitable for upland placement and subsequent beneficial use due to lack of contaminated sites and sources. Further characterization of material in reconstruction engineering and design should be performed to properly characterize the type of sediment and its suitability for proposed beneficial (other on island construction uses).

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.