

HAMMER SLUGH
ED

MEMORANDUM

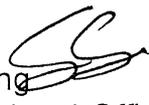
State of Alaska

Department of Environmental Conservation
Southeast Regional Office

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TO: Bill Ballard
ADOT/PF - Southeast Region
Design and Construction

THRU:

FROM: Sally Schlichting 
Southeast Regional Office
Water Quality Section

DATE: February 13, 1995

FILE NO:

TELEPHONE NO: 465-5350; FAX: 465-5362

SUBJECT: Petersburg Airport
Runway Resurfacing Project
Environmental Assessment

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

DEC has reviewed the above referenced document concerning the proposal to resurface the Petersburg Airport runway, taxiway, apron to compensate for differential settling and to improve drainage by installing ditches and culverts.

We are concerned with the potential impacts caused by drainage from the project into Hammer Slough Creek. This stream is currently on the State's Tentative Revised 303(d) list for TMDL (Total Maximum Daily Load) impaired waterbodies. Hammer Slough is listed as impaired for sediment and habitat modification. This means that the load allocation for the amount of sediment the stream can handle has been exceeded. With regard to habitat modification, this stream's anadromous properties have been heavily impacted by stream re-routing, obstructions in the stream bed, or other physical modification.

Our concerns lie specifically with the sedimentation produced by the proposed project's activities. The EA lists controls proposed to limit sediments entering Hammer Slough. The controls are focused at construction-phase impacts. However, DEC has additional concerns with long term impacts which are not addressed in the EA. Sedimentation from chronic runway/apron runoff has severely impaired Hammer Slough, threatening its anadromous functions.

DEC recommends that the final design plan include the following protective measures:

1. During the construction phase, State Water Quality standards for sediment load in anadromous streams must not be exceeded (18 AAC 70.020 (1)(C)).
2. To confirm that State WQS are not being exceeded during the construction phase, monitoring for turbidity shall be conducted in the upper tributary of Hammer Slough that is designated to receive drainage from the project.
3. Before this project proceeds, DOT should develop permanent BMP's that would include preventive measures such as sediment traps or silt fences to catch silty runoff from the runway caused by sand and gravel usage during the winter months. The plan should include regularly scheduled maintenance cleaning of these traps.

4. Sediment and erosion control shall be actively employed during construction. Techniques for sediment and erosion control shall include, but are not limited to:

- a. Using clean shot rock for all discharge.
- b. Placing silt barriers along footing of fill where fill comes in contact with surface water.

Thank you -- we appreciate the opportunity to comment.

cc: Art Dunn, Dunn Environmental Services
Janet Schempf, Dept. of Fish & Game
Bob Palmer, Dept. of Natural Resources
Leo Luczak, City of Petersburg
Christine Valentine, DGC