January 12, 2003

**Opposition Brief of Appellee Intervener Regarding Alaska Glacier**

**Seafoods Processing Plant, Auke Bay, AK**

1) **The need for a plant on the North End of Juneau**

As the dynamics of the fishing industry continues to change, the need for a fish processing facility on the North end of Juneau is greater than it has ever been. The reasons we feel it is important are:

1. Quick turn around times for the fleet. By having a full service facility in Auke Bay, fisherman would save time by not having to navigate their vessels around Douglas Island and then up Gastineau Channel for a delivery of fresh fish. The average transit time around Douglas Island is four hours one way. Hence, by delivering into Auke Bay, each boat would save eight hours of running time, or a full day, by being able to deliver into our proposed site. For the fishermen, this has a huge impact on turn around time for those wanting to make another trip and also for those that are in need of repairs, supplies, etc. By having a processing plant in Auke Bay, it will allow these boats to be more efficient and lower their operating costs which will improve their bottom line.

2. Fresher fish. In today’s seafood market, the trend is towards fresh fish, where as recently as the early 1990’s, the market trend was for frozen. The fresh market is extremely competitive and by being able
to offer fish that is even a day or two fresher can be the difference in making a sale or not. With all the transportation services Juneau has to offer, and a plant in Auke Bay, Alaska Glacier Seafoods would have a competitive advantage by being able to deliver the freshest possible seafood to market.

3. Safety. In the winter and spring, weather is often a factor in trying to deliver product into downtown Juneau. A facility in Auke Bay would give boats a safer option of delivering their catch by reducing travel time, without incurring delays in delivery.

2.) Alternative Locations For A Seafood Processing Plant

In the Appellant’s Opening Brief, several references are made suggesting that Alaska Glacier Seafoods has other potential sites for building a processing plant (Opening Brief, pg. 6). The locations listed included the Allen Marine Dock as well as the space on the East side of the ferry terminal. Neither of these sites are feasible locations for the following reasons:

1. Our lease expired with Allen Marine at the end of 2000. This lease was not renewable as the owners of the dock were expanding their own operations and need more space (R. 7; Tr. 17). It should be noted that fish has not been unloaded from that site since the lease expired.

2. The East side of the ferry terminal, as proposed by DOT, was a short-term lease only (four years), which did not allow for
permanent structures to be built on the property. Therefore, we found that location unfeasible.

3.) **Motion to include Wards Cove Closure Announcement in the Record**

The announcement of the closure of Wards Cove occurred after the planning commission made its ruling about our permit, therefore is not in the record. Because of the substantial impact on the local and statewide fishing industry, we would like to make a motion to include the announcement of the Wards Cove closure into the record. A processing plant in Auke Bay would help offset a portion of the negative impacts on the local fishermen caused by this closure.

4.) **Motion to include Proposed Consistency Determination by DGC**

AGS feels that is important to review the Consistency Determination issued by DGC on December 3, 2002, therefore we would like to make a motion to include this information into the record.

**Conclusion**

For the reasons listed above, Alaska Glacier Seafoods, Inc. feels that the unanimous approval of this project by the Planning Commission should be upheld and this project should be allowed to move forward.

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Jim Erickson  
Co-Owner  
Alaska Glacier Seafoods, Inc.
Mr. Chris Crenshaw  
Agent for Alaska Glacier Seafoods  
R&M Engineering, Inc.  
6205 Glacier Highway  
Juneau, AK  99801-7906

Dear Mr. Crenshaw:

SUBJECT:  AUKE NU COVE 1 (Seafood Processing Facility)  
STATE ID NO.  AK0205-12J  
FINAL CONSISTENCY DETERMINATION

The Division of Governmental Coordination (DGC) has completed coordinating the State's review of Alaska Glacier Seafoods' proposed project for consistency with the Alaska Coastal Management Program (ACMP). After issuance of the proposed consistency determination on 11/26/02, agencies requested changes to the stipulations. On 12/3, parties concurred.

Scope of Project Reviewed
The proposed project is placing fill on privately owned tidelands in Auke Bay at Auke Nu Cove, in Juneau, abutting the west side of the Auke Bay ferry terminal, to support a commercial seafood processing and handling facility. The facility will allow loading and offloading ice, bait, fish and crab from marine vessels. The project does not include any outfall (neither sanitary sewer nor fish waste). Fish waste products from processing will be disposed at sea, per the 5/10/02 authorization from the U.S. Environmental Protection Agency, which states: "...your Notice of Intent (NOI) to be covered by the NPDES Permit AK-G52-000, the general permit for Alaskan seafood processing facilities. ... You have requested authorization to discharge at sea from a vessel underway at speeds greater than three knots in a receiving water with depths greater than −60 feet MLLW and at a distance of one-half mile from shore south of Point Salisbury and southeast of Tantallon Point. EPA ... approves your waiver request and authorizes your discharge under general NPDES permit AK-G52-0000 ... The permit includes an effluent treatment requirement of grinding solid seafood processing wastes to one-half inch ... before discharge, an effluent limit of 10 million pounds of seafood processing waste residues per calendar year, a prohibition on the discharge of petroleum, hydrocarbons, oil and grease, and a narrative limit on the violation of Alaska Water Quality Standards.... The permit requires that you develop and implement a best management practices plan that controls and reduces
pollutant discharges at your site.... The permit requires that you submit an annual report on seafood processing activity, ... and process changes ... conduct periodic monitoring of the sea surface, seashore, and seafloor....”

The fill pad consists of discharge of up to approximately 15,600 cubic yards (cy) of NFS embankment fill and riprap into approximately 0.63 acres of waters and navigable waters. The fill will extend to approximately minus 0.0 foot below MLLW. The fill material will be retained by installation of an H pile and concrete wall panel system. The shotrock will be placed first to construct the panels, and then granulated fill material will be placed. The footprint of the fill is designed to allow for a building, parking, container van staging, and ice machine. A crane would be constructed for unloading seafood from the boats and loading ice. The project is entirely within AGS's privately owned tidelands.

Treatment of sanitary waste will be processed through an approved secondary treatment wastewater system on site; tanks will be cleaned by pumping and removing sewage. No discharge of sewage or gray water will occur into marine waters.

The location is lot 2, ATS 357, T. 40 S., R. 65 E., Section 21, CRM, latitude 58 degrees 22 minutes 56 seconds and longitude 134 degrees 41 minutes and 15 seconds. ATS 357, lot 2, is 165' x 165.8'. Also, at the 4/10/02 meeting, the CBJ advised that this site is outside the Juneau Coastal Management Plan's special waterfront areas.

AGS states that there is a public need for a seafood processor in this area, and also seafood processing is important economically to the community.

Background. In 1999 AGS proposed the seafood processing facility on this same lot located on the west side of the ferry terminal. The 1999 proposal would have been larger, extending onto state tidelands (the project was called Auke Nu Cove 1). In May 2000 the Department of Natural Resources issued a written denial for use of state tidelands on the west side of the terminal, based on information provided by DOTPF that the area would be needed for enhancements to the ferry terminal to accommodate future ferries. The state assigned a pending file number, ID1999-0815J, and prior to starting the state review, AGS withdrew the application. In September 2000 you submitted a new application packet for use of the state tidelands on the east side of the ferry terminal, proposing to use the area for an interim period of time until the area is needed by the ferry system. The east site was the same site as a previous ACMP review conducted in 1998, Auke Bay 132 for a long-term lease for a seafood processing facility, proposed by a different applicant. A review was conducted of the AGS's proposed short-term facility on the east side of the ferry terminal under Auke Bay 135, DGC file AK0010-05J, and a final consistency determination was issued 1/23/01. The facility was never constructed on the east side, by either applicant, and now, in 2002, the proposal has switched back to the west side of the ferry terminal.
ADOTPF has been a review participant in this review, as the Alaska Marine Highway operations may need to expand.

**Mitigation.** The project has been revised in 2002 to mitigate impacts to the environment: (1) to reduce impacts to the environment ASG has deleted the originally planned marine discharge of fish waste products, which previously was a major concern to adjacent residential neighborhoods; (2) no fill or dock structures are proposed outside lot 2, ATS 357. The fill area is designed to be compact and the minimum size needed to support the operation.

**Consistency Determination**

This consistency determination applies to the following federal and State authorizations per 6 AAC 50:

- U.S. Army Corps of Engineers
  - Sections 404 and 10 Permit No. 2-1999-1426

- Alaska Department of Environmental Conservation (DEC)
  - Certificate of Reasonable Assurance (401)

The project received a U.S. Environmental Protection Agency Seafood Processing General Permit #AK-G52-0000. The GP was previously reviewed for consistency with ACMP, and not subject to further ACMP review. The project also requires a local authorization from the City and Borough of Juneau (CBJ). On 8/2/02 the CBJ informed us they received a conditional use permit application.

No State or federal agency may issue an authorization before DGC issues a final consistency determination. Most State agencies should issue permits within five days after DGC issues a final consistency determination.

The Alaska Departments of Environmental Conservation, Fish and Game, and Natural Resources and the Juneau coastal resource district have reviewed your proposed project. Based on that review, the State concurs with your certification that the project is consistent with the ACMP with the following alternative measures, which will appear as stipulations on the State permits noted:

**ADEC 401**

1. Fill placed prior to installation of the concrete panel retaining wall must consist of only shotrock. Granulated fill may only be placed after the completion of the retaining wall installation. *(Revised 12/3/02)*
2. Fill material must consist of rock fill and riprap that are free from fines and suspendible material, and free from contamination by petroleum products or toxic substances.

3. The work area must be flagged, and all operation of machinery and equipment on tidelands must remain within the fill footprint. The applicant shall contact CBJ (Teri Camery at 586-0755) to coordinate the flagging effort. (Revised 12/3/02)

4. In-water work is prohibited between March 15 and June 15. This prohibition includes excavation, fill, pile-driving, and other construction.

5. Oil/water separators, or another system which would provide equal or greater protection to water quality, must be used and maintained to always be in good working order. (Revised 12/3/02)

6. Material such as sorbent pads and booms must be available on site to be used to contain and clean up any petroleum product spilled as a result of construction activity. (Revised 12/3/02)

Stipulations 1, 2, and 3 are necessary to protect water quality by minimizing sedimentation in waters, and stipulations 5 and 6 are intended to minimize introduction of petroleum products into the water, per 6 AAC 80.140 Air, Land, and Water Quality. Stipulation 4 is to protect habitat by minimizing disturbance during sensitive life stages, per 6 AAC 80.130 Habitats and Juneau Coastal Management Plan policy 49.70.950(c)(3).

I have enclosed a copy of relevant ACMP standards and approved coastal district policies.

**Discussion of the finding**

The habitat standard in 6 AAC 80.130 and in the Juneau Coastal Management Program (JCM, 44.70.950 require maintaining or enhancing habitats. The standard also contains an exemption, under which this project is found consistent per subsection (d) of 6 AAC 80.130. Habitats in the project area which are subject to the ACMP habitats standard include tideflats. According to the habitat standards, these habitats must be managed so as to maintain or enhance the biological, physical and chemical characteristics of the habitat, which contribute to its capacity to support living resources (6 AAC 80.130 (a) and (b)). In addition, wetlands and tideflats must be managed so as to assure adequate water flow, nutrients, and oxygen levels and avoid adverse effects on natural drainage patterns, the destruction of important habitat, and the discharge of toxic substances 6 AAC 80.130 (c)(3). Subsection (d) of the standard provides: “Uses and activities in the coastal area which will not conform to the standards contained in (b) and (c) of
this section may be allowed by the district or appropriate state agency if the following are established: (1) there is a significant public need for the proposed use or activity; (2) there is no feasible prudent alternative to meet the public need for the proposed use or activity which would conform to the standards contained in (b) and (c) of this section; and (3) all feasible and prudent steps to maximize conformance with the standards contained in (b) and (c) of this section will be taken."

The State recognizes the mitigative measures ASG included in the proposal, and also determines the project meets the exemption requirements of the Habitats standard 6 AAC 80.130(d) and the JCMP policy. ADF&G commented that the project is likely to result in further degradation of nearby eelgrass beds which provide critical habitat for many fish and shellfish species. Eelgrass beds in Auke Nu have been declining at an alarming rate. In 1984 the eelgrass beds covered about 14 acres. By 1996 the eelgrass bed had been reduced to 4.5 acres. A recent eelgrass survey was conducted 9/6/02 by the National marine Fisheries Service, and it found a large continuous bed of 3.82 acres about 145 feet from the edge of the proposed fill, with smaller patches within 13.8 feet and 73 feet. The eelgrass beds will be degraded from the fill and propeller wash.

Also, the Juneau coastal district commented that the project was reviewed by the Wetland Review Board at the August 2002 monthly meeting on 8/15/02 (Attachment 21, Board Minutes). According to the Juneau Wetland Management Plan, the Wetland Review Board has an advisory role on all projects requiring a Corps of Engineers permit. The Board recommended use of oil/water separators. Board members also noted that the site was shallow and that the cove was formerly very productive and once supported a vibrant herring fishery. Concern was expressed over impact to eelgrass beds from turbulence and discharge from boat traffic. Overall, board members appeared to support the project, especially with respect to existing development in the area, but had reservations about potential habitat impacts.

The CBJ received a report from the National marine Fisheries Service. CBJ Planning Supervisor and ADF&G Habitat biologist conducted a site visit on 9/6, during a minus three tide, for purposes of identifying eelgrass beds near the site. The nearest eelgrass bed was estimated to be 20-30 feet west of the site. Mr. Graham noted the beds as isolated colonies, which were several square feet in size at the largest. As discussed in the letter, NMFS conducted an intertidal dive study on 9/6/92. Divers observed pollack and dungeness crab within the eelgrass bed. NMFS considers eelgrass beds as "special aquatic sites."

Public need. The Juneau coastal district, who receives deference on public need, has informed DGC that the applicant has sufficiently documented the significant public need for the project, as follows: (1) There is a significant need for a seafood processing plant in Juneau. There are multiple letters of support from fishermen and supporting industries; (2) The CBJ Comprehensive Plan supports expansion of the seafood industry. Juneau currently has only one
seafood processing plant on the water edge, Taku Smokeries, which is an 8-hour round trip for fishermen on the west side of Auke Bay. There is a strong need for another facility for fishermen to unload and resupply. (3) The economic benefits of a seafood processing plant support many side industries including marine industries and marine transport, in addition to providing jobs and a significant amount of tax revenue to the city.

Alternatives. Regarding feasible alternatives, the following was considered: (1) The lot on the east side of the ferry terminal is not an option for the owner. The applicant completed the ACMP review process on this east lot, but could not accept terms of the lease from ADOTPF, which prohibited any permanent structures on the lot and limited the lease period to four years. (2) A seafood processing plant can only be on a lot zoned Waterfront Commercial or Waterfront Industrial, according to CBJ Land Use requirements. There are no currently available lots in this zone. (3) The applicant’s dock lease at Harris Harbor downtown will expire at the end of this year, and a future lease is uncertain. Even if the lease may be renewed, the site has no on-site processing capacity (which results in constant shuttling of fish product to the owner's warehouse) and is cost-prohibitive for a longer term seafood operation due to the long travel time for fishing boats through Gastineau Channel. Developing a facility in Auke Bay reduces fishing boat travel time by eight hours and enables extensive cost-saving by having processing at the site where the catch is unloaded.

Regarding measures to maximize conformance, the applicant has minimized the size of the fill from its previous design, has eliminated a seafood processing waste discharge into marine waters, and the Departments of environmental Conservation and Fish and Game, and the Juneau Coastal District, have imposed alternative measures to provide protections. Also, the project will utilize deep-water waste disposal methods in accordance with the EPA general NPDES permit, and the AGS must meet DEC standards for water quality, toxics and septic.

The Juneau coastal district discusses the project’s compliance with other enforceable policies in the JCMP:

1. **Section 49.70.905(18)(A) and (B), Coastal Development.** This project site is just outside the boundary of a Special Waterfront Area designated in the JCMP. Special Waterfront Areas are designed by development in the JCMP, and allow some relaxation of habitat standards, including allowance of intertidal fill. Since this area is not within a Special Waterfront Area, 49.70.905(18)(A) and (B) must be met, which state: “Industrial and commercial uses on or adjacent to the shorelines of navigable waters must be located in the appropriate special waterfront designation established in section 49.70.960 unless:

   (A) There is no feasible and prudent alternative to meet the public need for the use; and
   (B) The nature of the use requires a specific location and no other location will suffice.” Criteria A is met, as discussed in the above Alternatives. Regarding Criteria B, the nature of a seafood processing plant requires a site with adequate marine and land access. The
site east of the terminal is not an option due to the prohibitive terms of the DOT lease, and other appropriately zoned property is unavailable, therefore this criteria is also met.

2. **49.70.905(13)(A) through (G), Coastal Development.** Because the project is outside of the Special Waterfront District, it must also meet the exemption criteria to allow intertidal fill, in accordance with JCMP 49.70.905(13)(A) through (G). The project will fill the intertidal area to a tidal elevation of approximately minus one. The section reads: "Filling of intertidal areas below mean high tide, not specifically addressed in section 49.70.960, for the expansion of upland area is specifically prohibited unless clear and convincing evidence is provided showing that all of the following conditions exist that:

(A) "Strict compliance with the policy would prevent the applicant from making a reasonable use of the property or would make compliance unreasonably burdensome." The subject property has no available uplands for development. This limits to development of the property to two options: (1) intertidal fill; or (2) building on pilings. According to the applicant, the submitted design using intertidal fill will have a total project cost of $500,000 to $700,000. If a pile design was used for the entire site, the piles in place and the concrete decking would run up to $1,100,000, which would put the overall project in the range of $1,400,000, which is prohibitively expensive (Attachment 6, 8/2/02 applicant letter). This criteria is met.

(B). *Fill is the only means to allow development of the property which is similar to other properties in the vicinity;*" Other properties in the vicinity, across the boundary within the Special Waterfront Area, have extensively utilized intertidal fill. As noted above, a pile-driven design for the project is cost-prohibitive. This criteria is met.

(C). "Less than the proposed fill would prevent the applicant from making a reasonable use of the property or would make compliance unreasonably burdensome;" Due to the demands of a seafood processing plant, boat mooring, loading/unloading activities, traffic, waste disposal and the small size of this commercial lot, every foot of the lot is needed to run and maintain the operation. Less than the proposed fill would prevent use of the property for this purpose. This criteria is met.

(D). "The proposed project will not be detrimental to the public health, welfare and safety or to other properties in the vicinity." The project will have habitat impacts, but meets additional criteria for exemption, as described in the analysis that follows, and therefore meets the requirements of other JCMP policies. This criteria is met.
(E) "The proposed project will not be detrimental to the public health, welfare and safety or to other properties in the vicinity," No evidence indicates that the project will have health, welfare, or safety impacts. This criteria is met.

(F) "Approval of the project will not authorize uses on the property otherwise not allowed by other state, federal and local laws and regulations;" The project is an authorized use. This criteria is met.

(G) "If applicable, the meaning of the phrase 'feasible and prudent' has been considered and found to support approval of the proposal to fill." Fill is the only feasible and prudent alternative for development of the lot. This criteria and all criteria necessary for allowing intertidal fill have been met.

In addition to the criteria for industrial use outside of a Special Waterfront Area and criteria for intertidal fill, the Coastal Development section also addresses navigation and scenic values.

3. Coastal Development Section 49.70.905(5). "Shoreline industrial developments, ports, harbors and marinas shall be sited, designed, constructed such that: (A) Lawful navigation is not impaired; (B) Facilities for proper handling of sewage, refuse, fuel and waste oil are provided; (c) All feasible and prudent steps are taken to prevent water pollution by incorporating best management practices; (D) Adequate access and utility access are available or can be provided." The proposed plant will be located in an area with heavy marine traffic next the ferry terminal at the mouth of Auke Nu Cove. The State has no evidence to indicate that lawful navigation will be impaired, and has received no comments regarding boat traffic from DOTPF or the Coast Guard. The project will utilize deep water disposal methods for seafood waste. Refuse, fuel, and waste oil will be handled according to DEC standards. The state requires incorporation of oil/water separators into the lot drainage design to ensure that all feasible and prudent steps are taken to prevent water pollution. Adequate access and utility can be provided at the site.

4. Coastal Development Section 49.70.905(12): "To the extent feasible and prudent, development shall not detract from the scenic qualities of the shorelines, shall be compatible with surroundings, and shall not significantly block scenic vistas." The development will impact the scenic quality at the mouth of Auke Nu Cove. However, the project is adjacent to existing industrial development and is therefore compatible with surroundings to the east end of the cove. No feasible and prudent alternative exist to place the development elsewhere, as noted previously.

The JCMC Coastal Development Section includes broader policies, which overlap closely with the seafood Processing Section and JCMC Habitat Standard.
5. a. Coastal Development Section 49.70.905(4). "Dredging and filling shall be prevented in highly productive tideflats and wetlands, subtidal areas important to shellfish, and water important for migration, spawning and rearing of salmon and other sport fish species, unless there is a significant public need for the project and there is no feasible and prudent alternative to meet the public need."

b. Seafood Processing Section 49.70.930(a). "Shoreline use shall not adversely impact important fisheries habitat, migratory routes and harvest of significant fish or shellfish species. Shorelines having banks, beaches, and beds critical to the preservation or enhancement of the fisheries resource base shall be maintained in, or restored to, their original condition wherever and whenever feasible and prudent."

c. ICMP Habitat Standard 49.70.950(c)(3). "(3) Wetlands and tidelands shall be managed so as to ensure adequate water flow, natural circulation patterns, nutrients, and oxygen levels, to avoid the adverse effects on natural drainage patterns, the destruction of important habitat, and the discharge of toxic substances."

Public Comment

The State received a comment dated 6/24/02 from the public expressing opposition to the project based on: (1) habitat value and high productivity of the cove, (2) an eelgrass bed located close to the proposed project’s fill of intertidal area, which may be covered by sediment or suffocated by decreased water quality in the cove; (3) the recreational and subsistence uses of the cove; and (4) cumulative impacts of the current proposal and past activities. The commenter asked regulatory agencies to investigate the project’s impacts to the eelgrass bed. This comment was distributed to reviewers. The topics are discussed in the letter.

This final consistency determination is a final administrative decision for purposes of Alaska Appellate Rules 601-612. Any appeal from this decision to the superior court must be made within 30 days of the date of this determination.

This final consistency determination represents a consensus reached between you as the project applicant and the reviewing agencies listed above, regarding the conditions necessary to ensure the proposed project is consistent with the ACMP. We are informing the federal agency responsible for approving a federal authorization for your project that your original proposal has been modified subject to the conditions in this consistency determination.
Advisories.

ADEC advises that Alaska Glacier Seafoods is required to obtain an ADEC-approved on-lot treatment plant. DEC system approvals are not normally subject to ACMP review. Please contact Mr. David Khan, ADEC at 465-5317.

ADF&G recommends additional mitigation: (1) replace eelgrass beds that would be impacted by this project with equivalent beds elsewhere in the Auke Nu Cove; or, as an alternative, (2) if eelgrass would not be expected to survive due to cumulative impacts of development in the vicinity, remove and dispose of the abandoned boats from Auke Nu Cove. These abandoned boats are causing habitat damage to tidelands when they are grounded at low tide.

The CBJ comments addressed: (1) Preparation of the fill site and placement of fill material needs to be accomplished so that entry of fines and suspendible material into the ocean is kept to the minimum practicable; (2) the fill structure needs to be designed and constructed to ensure long-term stability; (3) prior to the issuance of a CBJ building permit, the applicant must submit a drainage plan will includes oil/water separators and a maintenance plan for the separators; (4) Prior to the issuance of a CBJ building permit, the applicant must submit a treatment plan for warehouse gray water treatment.

Your consistency determination may include reference to specific laws and regulations, but this in no way precludes the applicant’s responsibility to comply with all other applicable State and federal laws and regulations.

This consistency determination is ONLY for the project as described. If Alaska Glacier Seafoods proposes any changes to the approved project, including its intended use, prior to or during its siting, construction, or operation, they must contact this office immediately to determine if further review and approval of the revised project is necessary. Changes may require amendments to the State approvals listed in this consistency determination or require additional authorizations.

If the proposed activities reveal cultural or paleontological resources, please stop any work that would disturb such resources and immediately contact the State Historic Preservation Office (907-269-8720) and the U.S. Army Corps of Engineers (907-753-2712) so that consultation per section 106 of the National Historic Preservation Act may proceed.

By copy of this letter, I am informing the Corps of Engineers and Environmental Protection Agency of the State’s determination. Please contact me at 907-465-8790, or email lorraine_marshall@gov.state.ak.us if you have any questions.
Sincerely,

Lorraine Marshall  
Project Review Coordinator

cc:  Jim Powell, DEC *  
     Tim Rumfelt, DEC *  
     Carl Schrader, DFG *  
     Brady Scott, DNR *  
     Teri Camery, CBJ *  
     John Leeds, COE *  
     Moira Ingle, ADF&G *  
     Van Sundberg, ADOTPF *  
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     Jim Potdevin, ADOTPF Alaska Marine Highways *  
     Michelle Masuda, Public  
     Horst Schramm, Public  
     John Gitkov, Public  
     Mike Erickson, Applicant  
     Sylvia Kree, DGC *  
     Chris Meade, EPA *  
     Steve Brockmann, FWS *  
     Janet Herr, NMFS *

* = sent by email