



September 11, 2023

Alaska District Corps of Engineers
ATTN: CEPOA-PM-C, Mr. Bruce Sexauer
2204 3rd Street (Bldg 2204)
JBER, AK 99506-1518
Electronically Submitted: Bruce.R.Sexauer@usace.army.mil

Re: General Investigation for Saint Paul Harbor Improvement and Expansion Project

Dear Mr. Sexauer,

Please accept this letter as a formal, renewed request from the City of Saint Paul to work with the US Army Corps of Engineers on a General Investigation for the Saint Paul Harbor Improvement and Expansion Project.

In August of 2021, the City of Saint Paul submitted a General Investigation Request for the Saint Paul Harbor Improvement and Expansion Project. In September of 2021, and again in June of 2023, the City of Saint Paul requested planning assistance from the Corps - Alaska District to provide data collection, planning, and study services, and to provide recommendations related to the Saint Paul Harbor Improvement and Expansion Project.

The City of Saint Paul is willing and able to participate as the Sponsor for the Saint Paul Harbor Improvements and Expansion Project in partnership with the U.S. Army Corps of Engineers, to cooperatively investigate expansion of the breakwater, revision of the harbor entrance channel, relocation of the exit to the Salt Lagoon, expansion of the upland, and expansion of the inner harbor.

The harbor is difficult to enter or exit during rough weather conditions. This is due to entry breakers, the necessity of a hard 90-degree turn at the entrance placing the entering vessel “in the trough”, uneven bathymetry within the harbor, and surge action and long period waves within the harbor. Waves routinely overtop the breakwater and wave surges in the harbor basin combined with strong winds often result in vessels being slammed against mooring infrastructure.

Saint Paul Harbor is a regional port, serving the needs of commercial vessels operating across western Alaska in the maritime industrial, marine transportation and commercial fishing industries. Over time, demand has outgrown the harbor's ability to safely and efficiently serve this fleet. Certain sizes of commercial vessels can't access the port and harbor due to depth limits and configuration of the harbor entrance.

The City of Saint Paul, Alaska understands that a study cannot be initiated unless it is selected as a new start study with associated allocation of federal funds provided through the annual

Congressional appropriations process. It is our understanding that cost-sharing of the feasibility study is typically 50% federal government and 50% local sponsor, at a total cost of \$3 million.

We further understand that your office received updated guidance recently (March 2023 Memo RE: Implementation Guidance for Section 160 of the Water Resources Development Act of 2020, Definition of Economically Disadvantaged Community) that states that communities that qualify under one of four categories are eligible for a full cost share waiver.

The City of Saint Paul meets the following two of these criteria categories:

4.c.

The City of Saint Paul is in proximity of an Alaska Native Village. Saint Paul Island, approximately 44 square miles, is home to both the Aleut Community of Saint Paul Island Tribal Government (<https://www.aleut.com/>) and the Native Village corporation Tanadgusix Corporation (TDX) which was created under the Alaska Native Claims Settlement Act of 1971 to provide economic wellbeing for the indigenous Aleut people who resided in the village of St. Paul (<https://www.tdxcorp.com/about-us/our-history/>). Saint Paul Island has the largest Aleut community in the United States, one of the U.S. government's officially recognized Native American tribal entities of Alaska, with approximately 86% of the population Alaska Native.

Pribilof Islands Aleut Communities of St. Paul & St. George Islands and the Native Village of Saint Paul Island are listed as Tribes Served by the Alaska Region of the U.S. Department of the Interior Indian Affairs (<https://www.bia.gov/regional-offices/alaska/tribes-served>).

Saint Paul Island, AK is listed as a Alaska Native Village in the National Archives and Records Administration's Alaska Native Communities Research Guide (<https://www.archives.gov/files/education/native-communities/alaska-nativecommunities-guide.pdf>)

Saint Paul Island is a federally recognized Alaska Native Village Statistical Areas by the US Census Bureau ([https://www2.census.gov/geo/pdfs/partnerships/psap/G-622.pdf?#:~:text=Alaska%20Native%20village%20statistical%20areas%20\(ANVSAs\)%20are%20statistical%20geographic%20entities,vicinity%20of%20the%20ANV](https://www2.census.gov/geo/pdfs/partnerships/psap/G-622.pdf?#:~:text=Alaska%20Native%20village%20statistical%20areas%20(ANVSAs)%20are%20statistical%20geographic%20entities,vicinity%20of%20the%20ANV)). ANVSAs are statistical geographic entities representing permanent and/or seasonal residences of Alaska Natives who are members of, or receive governmental services from, the defining Alaska Native village (ANV). ANVSAs are intended to include only an area where Alaska Natives, especially members of the defining ANV, represent a substantial proportion of the population during at least one season of the year.

4.e.

According to the Climate and Economic Justice Screening Tool (<https://screeningtool.geoplatform.gov>), the Aleutians West Census Area (of which Saint Paul Island is a part of) is identified as "Partially Disadvantaged". It further states that the 4 Alaska Native Villages in this tract that are Federally Recognized are considered disadvantaged.

The City of Saint Paul, Alaska is aware that this letter constitutes an expression of intent to initiate a General Investigation and study partnership to address the specified water resources problems and is not a contractual obligation. We understand that work on the study cannot commence until it is included in the Administration's budget request, funds are appropriated by the Congress. It is understood that we or USACE may opt to discontinue the study at any time after the FCSA is signed but will commit to work together as partners from the scoping phase, and subsequent decision points throughout the feasibility study, on providing the necessary support to risk-informed decision making. If it is determined that additional time or funding is necessary to support decisions to be made in order to complete the study, our agency will work with USACE to determine the appropriate course of action. We would like to discuss how the City may qualify under the updated guidance for the full cost share waiver of the study. With your assistance, the detailed scope, schedule, and budget for the study have already been completed.

I look forward to working with the Corps of Engineers on this important project. Please contact me at your earliest convenience to arrange a further discussion of this request.

Sincerely,



Phillip A. Zavadil, City Manager

Cc: Senator Lisa Murkowski
Senator Dan Sullivan
Representative Mary Peltola
Saint Paul City Council
Mateo Paz-Soldan, MP Strategies
Curtis Lee, USACE Alaska District