



December 21, 2023

To the Haines Borough Assembly

From: Robynne Thaxton, Progressive Design-Build Consulting, LLC

Re: Status Report on the Lutak Dock Reconstruction Project

I have been requested by the Haines Borough staff to provide a status report on the Lutak Dock project. Although I have had limited time to gather information, I have spoken with and received input from Borough staff, R&M Consultants, the Owner's Advisor to the Project, representatives from MURAD, Turnagain Marine Construction, the design-builder, and Solstice, the environmental consultant for the project. I have also reviewed various reports such as the PND Consultants 2014 engineering report, the letter, website, and white paper from Lynn Canal Conservation, the Notice of Funding Opportunity (NOFO), relevant regulations, and project documents. This Status Report provides some history regarding the project and the current status as well as provides answers the questions presented to Borough staff by Assembly members.

History of the Project

Haines Borough was awarded a RAISE grant from the US Department of Transportation for the renovation of the Lutak Dock facility. To implement the project, the Borough hired several advisors, including R&M Consultants and Progressive Design-Build Consulting. Although the RAISE grant does not allow recipients to be reimbursed for funds that occur prior to finalization of the grant, the Borough recognized that it needed the expertise of these consultants to be able to implement the project. As part of the grant process, R&M Consultants provided a preliminary design and budget for the project. That preliminary design was approved by MARAD, and the budget was used to establish the grant amount.

The Borough conducted a public procurement to select a design-build team that would assist the Borough in designing, permitting, and constructing the project. Prior to publishing the contract with the design-build team, MARAD reviewed the contract and the procurement method. After a thorough review of the three shortlisted firms, the Borough selected Turnagain Marine as the design-builder. As part of the procurement and during the initial phase of the project, Turnagain Marine suggested an alternate design that provided a number of benefits to the Borough, including better environmental outcomes and cost certainty. Turnagain Marine presented the alternate design to the public at a Town Hall Meeting on February 8, 2023, and the Planning Commission considered and approved the Turnagain design on February 9, 2023. On February 28, 2023, the Assembly approved the alternate design, which has been used to obtain MARAD approval as well as the basis of the NEPA and permitting processes. MARAD approved the design because the new design has significant benefits regarding the cost, the environmental impact, and the ability to meet the grant requirements. After approval by MARAD,

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Turnagain used that design as the basis for environmental permits and processes that are required to obtain the grant funding. Among the required steps to obtain final MARAD grant approval is the National Environmental Policy Act (“NEPA”) process. Although the NEPA process states that an agency should not “limit the choice of reasonable alternatives”, agencies going through the process are allowed to develop plans and designs to support permits and approvals.

“This section does not preclude development by applicants of plans or designs or performance of other activities necessary to support an application for Federal, State, Tribal, or local permits or assistance. An agency considering a proposed action for Federal funding may authorize such activities, including, but not limited to, acquisition of interests in land (e.g., fee simple, rights-of-way, and conservation easements), purchase of long lead-time equipment, and purchase options made by applicants.”

40 CFR 1506.1(b)

In fact, to proceed through the NEPA and other permitting processes, the Borough was required to submit a design so that the regulators and agencies reviewing the permits and other applications could understand what would be built. The Borough has not done anything to limit the choice of reasonable alternatives with respect to the NEPA process. The limitations on the Borough’s choices arise from the timing of the MARAD grant.

As part of the progressive design-build process, at 65% design, Turnagain Marine submitted a lump sum price for the cost of the Project of \$25,594,147. The Assembly approved the price on February 28, 2023 and entered into a Phase 2 Amendment with Turnagain Marine. The Phase 2 Amendment includes several protections and milestones that Turnagain Marine must meet before proceeding with the project. Turnagain Marine was required to obtain approval of the final drawings and Construction Documents before proceeding with the Project. *Agreement with Turnagain Marine, Exhibit C, Section 2.03.B.3.* In addition, in the Notice of Intent to Award from the Borough, Turnagain was informed that it would be issuing a Notice to Proceed with the Construction Phase once permitting was approved. Turnagain Marine is fully aware that it cannot be reimbursed for any expenditures on the project until the MARAD grant is approved.

Because of significant supply chain issues, Turnagain Marine was faced with a difficult issue in October 2023. Although it had placed a hold in the production line with its steel supplier, the steel supplier informed Turnagain that it would lose its place in the production line if it did not convert its hold into a purchase of the steel. Losing its place in the production line would mean more than a year delay in the project and potentially significantly higher cost. Turnagain Marine was faced with a difficult decision and without informing the Borough or obtaining authorization to proceed, in October 2023 Turnagain Marine decided to convert the hold into a purchase of the steel to avoid the delay and increased costs. Part of Turnagain’s responsibility under its Agreement is to ensure compliance with the MARAD grant requirements; therefore, Turnagain was fully aware that it could not invoice the Borough for the cost until the MARAD grant was approved. Turnagain Marine informed the Borough of the purchase in November 2023, after the purchase had been made. The November 17, 2023 letter from Turnagain is attached. Turnagain has represented that it is managing the delivery schedule so that the cost of the steel will not become due until after the Grant Agreement is approved.

The Borough has not authorized the purchase of any materials. It is the Borough's position that Turnagain Marine purchased the steel at its own risk. Turnagain Marine has taken a different position. The Borough has confirmed with Turnagain Marine that it is not authorized to perform any work that is not associated with completing the NEPA process and obtaining remaining permits for the project. If this project does not continue, the Borough will likely be involved in litigation with Turnagain Marine regarding the purchase of the materials. Borough staff are doing what they can to avoid any litigation.

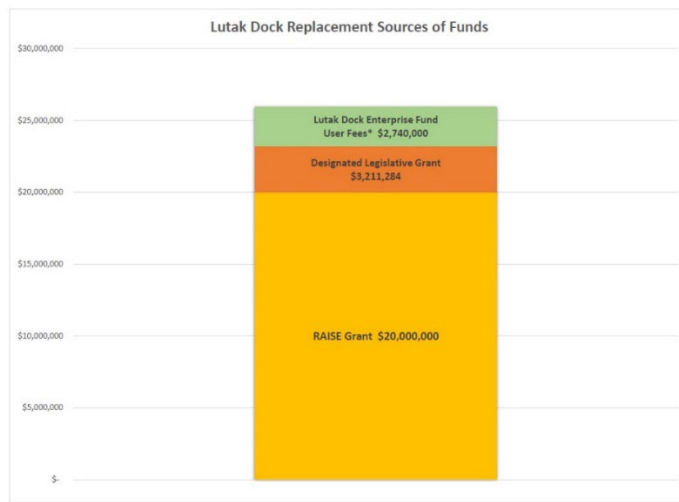
The Borough has informed MARAD of Turnagain's purchase. MARAD has requested additional information regarding the purchase and the contract, primarily if the purchase complied with the Buy America and other federal requirements in the Grant. Turnagain has provided the Buy America certifications from the steel supplier, and we are working with Turnagain to ensure that all federal requirements were met. Currently, the Borough has no information that would suggest that Turnagain's unilateral purchase will endanger the MARAD funding or render the funds ineligible for reimbursement. Again, the Borough's position is that Turnagain has incurred these costs, and the Borough will not be responsible for reimbursing Turnagain unless and until the MARAD funding is finalized.

Current Status

The NEPA process should be completed by February 2024. The Endangered Species Act (ES) consultation is anticipated to be completed by mid-January 2024, and the Incidental Harassment Authorization (IHA) should be issued by the end of January 2024. The USACE Section 10/404 permit should be issued by February 2024. Once the NEPA process is complete, MARAD will review and make a final determination regarding the grant, and the Borough anticipates that this decision will be made by end of February/early March 2024. Currently, the Borough anticipates no reason for MARAD to disapprove the grant. Provided MARAD approves the grant in the time expected, the project is scheduled to be completed by mid-November 2025.

Cost of the Project

With matching funds from the State of Alaska and the Lutak Dock Enterprise fund, the current cost of the facility will be \$25,951,284. A breakdown of the funding for the project is below:



* User fees paid primarily by Alaska Marine Lines & Delta Western

None of the costs for the project currently come from taxes paid by Haines residents. Although R&M performed an estimate for the project of approximately \$29 million, the previous estimate was based on a different design and based on 2023 dollars. If this project were re-designed, there is a significant risk that the cost of the project will increase based on escalation. Further, as explained below, any re-design will likely not meet the funding schedule for the MARAD grant; therefore, the Borough will have to pay for the cost of the new dock out of its own funds.

There have been questions regarding the cost of the maintenance for the dock, and the ability of the Borough to pay for the maintenance costs. The maintenance costs are paid for by the Lutak Enterprise Fund, which consists of user fees currently paid by Alaska Marine Lines and Delta Western, the two primary users of the dock. The cost of the maintenance of the dock is anticipated to be \$150,000 per year, plus approximately \$200,000 per year for anode replacement in 2053 (estimate is based on 2023 dollars). The anticipated revenue from the Enterprise Fund in FY 2023 dollars is \$405,000. The user fees for the dock are based on the cost of maintenance; therefore, the Borough will be able to rely on the Enterprise Fund to continue to support the maintenance costs.

Questions from the Assembly

1. If Turnagain has a “huge amount of material being prepared” as the KHNS article says, and none of it was pre-approved by Marad, it is my understanding that none of those costs are eligible for reimbursements. Is this true?

Answer: See explanation above regarding the Borough’s position on the costs incurred by Turnagain.

2. Until NEPA is completed and “No Significant Impact” found, the borough is prohibited from taking action that would “limit the choice of reasonable alternatives” 40 C.F.R. § 1506.1(a) Are we in violation of this NEPA regulation?

Answer: See the explanation above. Our consultant is preparing the environmental assessment (EA) following National Environmental Policy Act (NEPA) requirements, the President’s Council

on Environmental Quality guidelines, and the Maritime Administration's NEPA Program Guidance. It is understood that under NEPA, we cannot take action that would limit the choice of reasonable alternatives before NEPA is completed and a finding of no significant impact (FONSI), if warranted, is issued. Examples of choice limiting actions include acquisition, leasing, rehabilitation, demolition, new construction, and ground disturbance work such as clearing, grading or grubbing.

In addition, and likely in question, is the choice limiting action of expending either federal or borough funds in a way that reduces or eliminates the opportunity to choose project alternatives that would avoid or minimize environmental impacts or enhance the quality of the human environment. Funds have not been expended to require the selection on one alternative over another. While funds may have been spent by the contractor on design, permitting, and material, this would not bind MARAD to issuing a FONSI or selection of any alternative.

It should be noted that based on previous project planning and decisions made by the Borough Assembly, the NEPA process has dismissed alternatives from further consideration, which will be documented in the EA. In addition, the EA under development has a "Proposed Action," which is the alternative that was approved through MARAD's White Paper process. The original design included in the RAISE Grant Another is another alternative under consideration in the EA. These alternatives will be considered and fully evaluated in the EA for MARAD's review.

The CFRs (cited on page 1) recognize that to go through the NEPA process, a design must be produced. If the Borough decides to change the design, it will be required to go through the NEPA process from the beginning. The alternatives on the project with respect to NEPA approval still exist; however, the limitations on the funding on the project will not make the project viable if the Borough changes the design. The two issues are separate.

3. Was a Pre-Award Request submitted resulting in written approval from MARAD for Turnagain to incur costs other than design and engineering?

Answer: Yes, and that request is still pending. MARAD will likely respond to the request about the same time that the NEPA process is concluded and the grant is awarded; therefore, although the processes are parallel, they are likely to be resolved at the same time.

4. Does the current Lutak Dock design facilitate transfer of ore?

Answer: The currently designed dock, as well as the original grant awarded design, could transport ore at a limited capacity. The current design gives further options for accessing a barge, such as pass/pass or crane operations, but many of the same limitations still exist to transporting ore. The primary limitations are the uplands space and additional infrastructure. The current project was not designed to facilitate ore as one of its design criteria. To accommodate large scale ore transport, a great deal of infrastructure would be required including a large area, approximately 7-10 acres would be necessary for a concentrate storage facility as well as the following:

- The upland area would have to be expanded by at least 500%.

- An additional truck entrance would have to be added to achieve sufficient flow.
- The berth would have to be dredged to a deeper depth to accommodate ore ships at all tides.
- A material loader would have to be installed, similar to the one at Skagway. A mobile loader would not be viable for a long-term operation. Even if a mobile loader were used, the dock elevation would have to be increased to accommodate the high sides of an ore ship.
- Other facilities required would include:
 - Concentrate Storage Building
 - Concentrate Receiving/Unloading Shed
 - Offices
 - Laboratory
 - Crew Support Facility
 - Warehouse
 - Shop
 - Conveyor System
 - Equipment Wash Facility
 - Water Treatment (industrial waste water)
 - Domestic Waste Water Treatment

The Borough has full control over whether the additional infrastructure can be built.

Construction of these facilities would require both Assembly and Planning Commission approval.

Further, using the Lutak Dock for ore transport is extremely impracticable from the perspective of a mining company because:

- The public road is too close to the dock, and growing the facility with a public road in the middle would not be productive.
- The cost of the investment required to make the Lutak dock suitable for ore export is roughly the same as the improvements needed to convert the Lutak dock for ore transport. Given the cost of the required improvements, the lack of sufficient usable area around the Lutak dock, and the fact that the dock is controlled by a municipality that may change its mind regarding its use, a mining company would more likely build a private facility that would cost about the same amount of money as the improvements and not be subject to as much municipal control.

5. Was the design/build contract with Turnagain (\$25.6 million) approved by MARAD?

Answer: MARAD does not provide final approval of the contract until after the grant is approved. Prior to entering into the contract with Turnagain, the Borough provided MARAD the contract for review, and the Borough incorporated the requirements for federal projects into the Agreement. There are new federal requirements that MARAD has provided to the Borough, and we are working with Turnagain to make sure that these requirements are incorporated into the Agreement.

6. What expenditures have been made relating to the project covered by the grant budget?

Answer: The following are the costs that have been paid as of 12/19/23

Turnagain Marine Construction	294,500
R&M Consultants, Inc.	33,472
Progressive Design-Build Consulting	22,155
In-House Administration (estimated)	21,888
Total	\$372,015.00

7. Are the risk in halting or pausing the work today greater than the risks of continuing?

Answer: Yes. Halting or pausing the work will significantly endanger the MARAD funding and put the Borough at great risk of incurring costs for damages associated with the failure of the dock.

MARAD FUNDING IS AT RISK: If the Borough stops the project and requires a new design, the MARAD funding will be at significant risk. The MARAD grant is not final. Before it can be finalized, MARAD requires that the NEPA process and all permitting be in place well before the commitment date of September 30, 2024. As set forth in the NOFO, on June 30, 2024, “All necessary activities will be complete to allow RAISE grant funds to be obligated sufficiently in advance of the statutory deadline”. The reason MARAD requires that everything be complete before June 30, 2024 is so that MARAD has time to review and commit the funding before September 30. If MARAD cannot complete its process before September 30, then the funding will be rescinded and no longer available to Haines. There is a document produced by LCC that states that the Borough has until September 30, 2029 to make a decision. That statement is incorrect. The September 30, 2029 date is the date that the project must be completed. If the funds are not committed by September 30, 2024, the Borough will lose the funds.

If the design is changed, it is highly unlikely that the Borough will meet either the June 30 or the September 30 deadlines. The consultants working on this project have provided two timelines: one timeline reflects the actual schedule for the project and the other schedule shows an anticipated schedule based on the time frames that the current project has experienced. These two schedules are attached. Highlights of the time needed for a change in the design are below:

- The new design will have to be produced to the level it can be submitted to MARAD. That process will take approximately 4 months.
- The Borough will have to obtain approval from the Planning Commission for the new design.
- The Borough will have to obtain approval from MARAD for the new design. The last approval process took approximately 2 months.
- Once the new design is approved, the Borough will have to re-start the NEPA process as well as all of the permitting activities. Previously, that process required about one year from the date that MARAD approved the design with minimal opposition. With community opposition, it is unclear how long it will take.
- Because the process outlined above will take approximately 18 months and end in July 2025, the project will clearly not be ready for the June 30, 2024 MARAD review, and MARAD will likely pull the grant funding.

- If MARAD pulls the grant funding, then any modifications or damages associated with the Lutak dock will be the Borough's responsibility.

8. What are the projected annual maintenance costs of this design?

ANSWER: The projected annual maintenance costs of the design are \$150,000 per year, plus approximately \$200,000 per year for anode replacement in 2053 (estimate is based on 2023 dollars). The anticipated revenue from the Enterprise Fund in FY 2023 dollars is \$405,000. As noted above, maintenance costs are paid for by user fees through the Lutak Enterprise Fund. Because the user fees are adjusted to match the maintenance costs, the Lutak Enterprise Fund will be able to continue to fund all maintenance.

9. What viable design options do we have?

ANSWER: There are many viable design options, provided the Borough is willing to pay for them out of pocket instead of taking advantage of the MARAD funding. If the Borough wants the MARAD funding, there is only one practical design option, which is to continue with the option that has been approved and pursued for over a year.

10. Is the current dock larger than the "original" design?

ANSWER: Yes, the dock is 5% larger, but the upland area is almost unchanged. Because the new design encapsulates the dock and allows the old cells to be abandoned in place, the size of the dock had to be larger to encompass the old dock. Essentially, the footprint of the dock is bigger, but the usable space is not. This approach eliminates the substantial cost (millions of dollars) required to demolish and remove the old dock and allows the restoration of the dock's ability to support historic uses.

11. What do our clients (AML/Delta Western) think about the design?

ANSWER: Both AML and Delta Western support the design and the refurbishment of the dock. Attached to this Status Report are the correspondence from both AML and Delta Western.

12. What interest does the Chilkoot Indian Association have in the Lutak Dock?

ANSWER: None, other than as members of the community.

13. What freight handling/transshipment needs does Haines have that are not currently met?

ANSWER: The roll on/roll off ("ro-ro") dock is currently servicing the Borough's minimum needs with respect to goods and supplies that can be containerized. The ro-ro cannot support any transport that would require a crane, such as timber, bridge beams or aggregate. The ro-ro also cannot support the transfer of materials that cannot be easily carried by forklift such as power poles, piling, and light towers. Contrary to representations made in the community, the ro-ro is only temporary, and if the Borough continues to rely on the ro-ro for its needs, the Borough is at great risk. The structure of the ro-ro is dependent on the structural integrity of the Lutak Dock, which is very poor and likely to fail in the near term. The Lutak Dock is to be very frank, falling apart. There are voids in the dock, and the soils are eroding. This area is subject to extreme

geologic events, and even a minor earthquake could cause the dock to collapse. A 2014 engineering assessment of the dock by PND Engineers, Inc., provides a summary of the deterioration of the dock, and PND Engineers' conclusion is that the dock does not meet US Army Corps of Engineers (USACE) safety standards, and the dock "cannot withstand earthquakes at the current 'design event' level criteria mandated by building codes, waterfront design guides, or departments of transportation manuals." The report warns of sinkholes, voids, and collapse without warning. Given that the report was provided almost 10 years ago, and the issues with the dock have not been abated, the dock is in danger of being completely inoperable. The construction of the new ro-ro did not alleviate the urgent need to replace the dock. Significantly, in October 11, 2023, Alaska Marine Lines, the entity that installed the new ro-ro, noted in its letter of support "The need still remains for improving the uplands cargo area and a very real risk exists for the current seawall failing. When you combine the Lutak dock has **'reached the end of its credible 60-year service life and is effectively on borrowed time'** (PND Engineers assessment) and the Federal funding opportunity we support the completion of this project now." (Emphasis in the original)

When the dock collapses, it is unclear how the collapse will manifest, but the following issues are likely:

- The structure of the ro-ro is dependent on the structure of the dock and will either be inaccessible or unusable. The ro-ro was intended to be a temporary solution until a new dock was constructed. A replacement dock will take years, as the Borough will have to remediate any environmental hazard (see below), fix any obstruction (see below) and construct an entirely new dock at its own expense. Until a new dock is in place, goods and fuel will have to be trucked in.
- The collapse will cause an obstruction that the Coast Guard will require the Borough to fix and could impact the use of the adjacent ferry dock.
- A collapse will release any environmental hazards that are in the dock currently and require the Borough to clean up any contamination at its own expense.
- If there is anyone injured or property is damaged as a result of the collapse, the Borough will be liable for the damages. Although there is insurance to cover this cost, the Borough's liability will not be capped at the insurance. Although punitive damages in Alaska are difficult to prove, a plaintiff will likely use the fact that the Borough knew that the dock collapse was imminent and actively decided not to fix the problem as support for the award of punitive damages.

Although some of these costs will be covered by insurance, the Borough will be responsible for any costs over insurance, and it will be without the use of a dock until the dock is replaced. The criticism of the new design developed by Turnagain and approved by MARAD is unsupported by any review by an engineer or any engineering analysis.

14. Could the Borough request a "categorical exclusion" from NEPA requirements if CIV were to agree not to oppose the project?

ANSWER: The Borough's consultant reached out to MARAD to see whether the current design might fall under MARAD Categorical Exclusion (CE) number 4 "Reconstruction, modification, modernization, replacement, repair, and maintenance (including emergency replacement, repair, or maintenance) of equipment, facilities, or structures which do not change substantially the existing character of the equipment/facility/structure." In their response, MARAD stated that it is premature to discuss the level of NEPA review and that the requests for scope changes must go through their grants program office before they will consider the question.

There are specific circumstances which render the MARAD CEs nonapplicable and require preparation of an EA. These include if the action will affect a species listed or proposed to be listed as threatened or endangered under the ESA. In addition, a CE may not apply if the action will impact properties protected by section 106 of the National Historic Preservation Act.

As detailed above, completion of consultation under the ESA for the potential impacts to threatened humpback whales, endangered Steller sea lions, and proposed threatened sunflower sea stars is expected in January 2024. It is expected that Section 106 consultation with the CIV will be completed in the future. Further, the draft EA is nearly complete.

Conclusion:

The Lutak Dock is necessary for the viability of this community. In the very near future, the Lutak Dock will collapse and cause a great deal of damage, and this Borough has a responsibility to do what it can to avoid what will be a disaster both environmentally and economically. The Borough has a very clear choice:

1. It can continue with the project as approved and have that project be paid for entirely by non-taxpayer funds.
2. It can review the risks associated with a change in scope, which is likely to lead to running out the grant clock and the loss of funding for the project. If funding is lost, the Borough will need to find another way to address the serious liability issues associated with the Lutak Dock entirely at the Borough's expense.

The Borough does not have the choice to continue to use the ro-ro dock to service the Borough's needs. The Lutak Dock is in serious danger of collapse, which will cause significant cost and liability for the Borough in addition to the cost to replace the dock. In addition, although the Borough and Turnagain disagree with respect to the liability regarding the cost of the steel that was ordered, Turnagain will likely sue the Borough with respect to this issue, and the Borough will spend a substantial amount of money in attorneys' fees, all of which can be avoided if the project is allowed to proceed and MARAD approves the grant application, as anticipated.

Attachments:

1. November 17, 2023 letter from Turnagain Marine Construction
2. Current schedule for the project
3. Anticipated schedule for the project if the design is changed.

4. Letters of Support from AML and Delta Western



Friday, November 17, 2023
Haines Borough
ATTN Annette Kreitzer, Borough Manager

Project Status and Funding Confirmation Request

Mrs. Kreitzer,

In accordance with the Lutak Dock Progressive Design-Build Contract executed on September 23, 2022 and as modified by the Phase II Amendment, duly executed on March 1, 2023, Turnagain has progressed the project as required to fulfill our contractual obligations. Per the executed Phase II agreement Turnagain was authorized to commence work on Phase II activities starting on March 1, 2023 and must complete the Phase II scope by August 16, 2024.

To date, Turnagain has completed 38.1% of the contract work for a total value earned of \$9,741,114.61. The majority of this cost is associated securing the steel pipe piling. It is anticipated that the steel pipe piling will be ready for shipment and invoiced for payment shortly after the NEPA process is complete and the grant agreement is in place allowing the Borough to access the Marad Funds.

Work in progress includes:

- Completion of Bill Item 3.2 Purchase, Fabricate and Coat O-Piles – Scheduled completion is 12/15/2023
- Completion of Bill Item 3.3 Purchase Batter Piles and Fab Steel – Scheduled Completion is 3/1/2024
- Progression of Bill Item 3.6 Purchase Ground Improvement Materials and Equipment.

Work scheduled to Begin before 12/31/2023

- 2.1 PROCURE AND CONSTRUCT TEMPLATES PRIOR TO MOBILIZATION
- 2.2 RECEIVE AND STAGE MATERIALS AT FREIGHT FACILITY
- 4.1 PURCHASE PRECAST PILE CAP MATERIALS
- 4.6 FURNISH AND INSTALL BOLLARDS
- 5.1 PURCHASE FENDER ELEMENTS AND MATERIALS
- 6.1 WATER SYSTEM AND UTILITY SUPPORT
- 6.2 ELECTRICAL SYSTEM
- 6.3 PASSIVE CATHODIC PROTECTION SYSTEM (ANODES)

At the Borough Assembly Meeting on November 15, 2023 the Assembly members and the Mayor made several statements indicating that termination for convenience, or a cardinal modification to the scope of work, was a pending possibility. As Turnagain has not been directed in writing to stop or suspend work per the process described in General Condition 11.1 or Article 8 of the Phase II Addendum, Turnagain is continuing to progress the work in accordance with the contract.



Turnagain
Marine Construction

The Phase II Amendment states. "In executing this Amendment, Owner and Design-Builder each individually represents that it has the necessary financial resources to fulfill its obligations under this Amendment, and each has the necessary corporate approvals to execute this Amendment, and perform the services described herein." Prior to initiating any actions that may jeopardize the Borough's receipt and allowable use of the MARAD grant funds, please provide evidence of Borough funding sufficient to fulfill their current and future obligations to Turnagain Marine.

Sincerely,

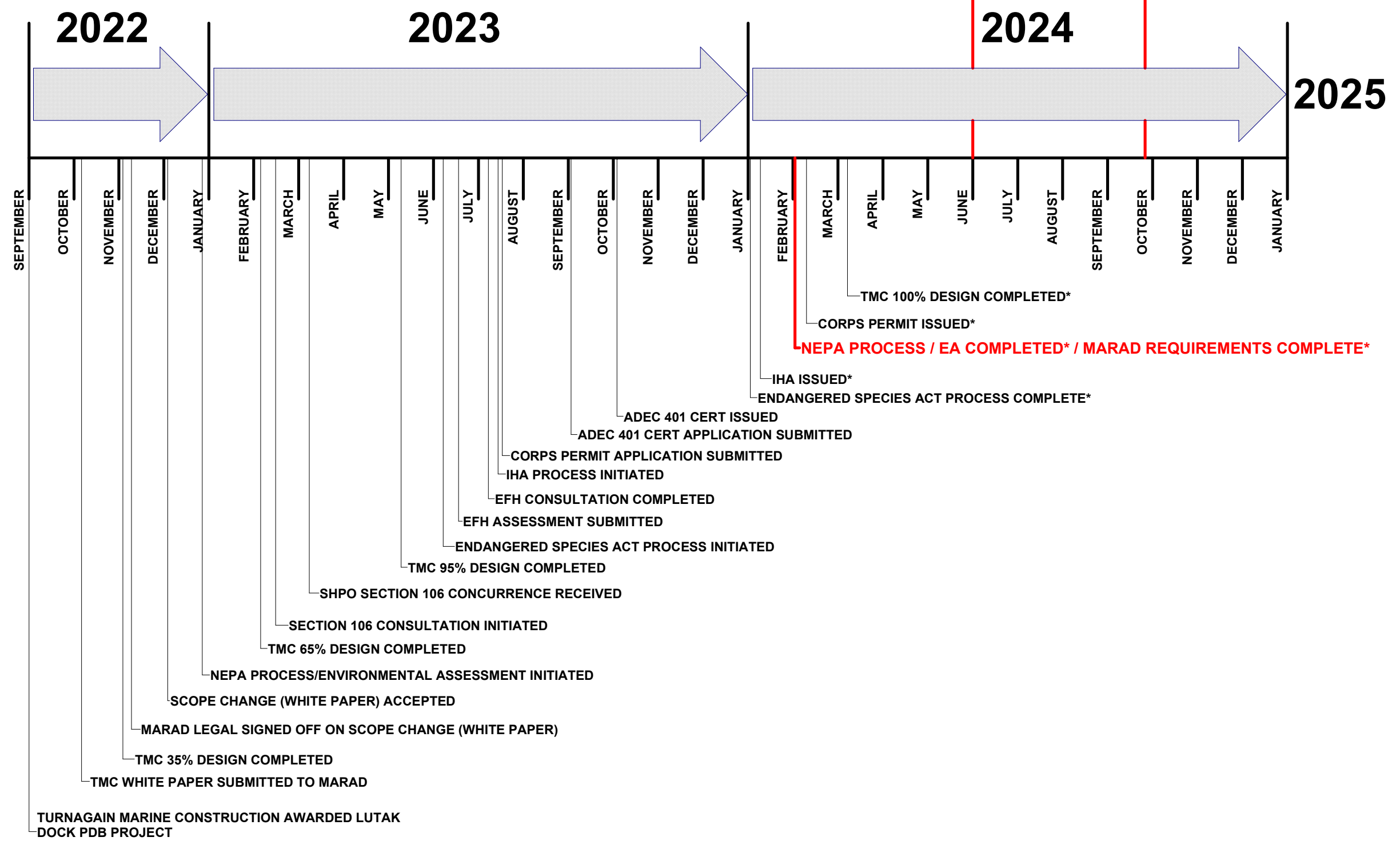
Jason Davis

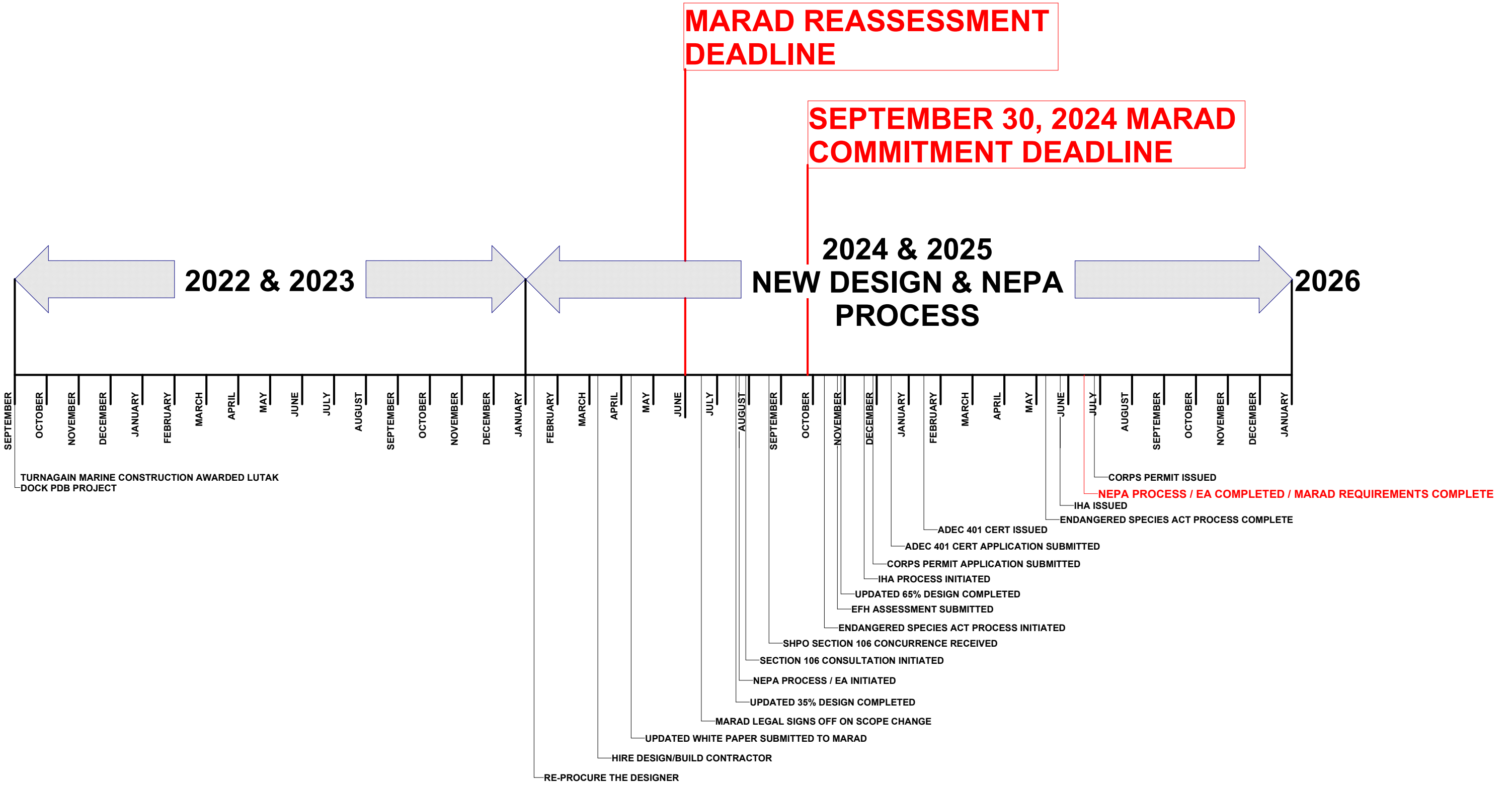
Jason Davis
President
Turnagain Marine Construction

CURRENT DESIGN & NEPA PROCESS

MARAD REASSESSMENT DEADLINE

**SEPTEMBER 30, 2024
MARAD COMMITMENT DEADLINE**







100 Mt. Roberts Street
Juneau, AK 99801
Main: (907) 586-3790
jnuoffice@lynden.com

To Whom It May Concern,
10/11/23

Alaska Marines Lines would like to offer its support for the Lutak Dock Replacement. The project is vital in keeping the supply chain intact for future generations and an integral piece to link Haines Borough, Southeast & Interior Alaska, and the Yukon. Furthermore, the grant funding was 1 of only 3 grants awarded to projects in Alaska.

In addition to these facts, AML invested \$2.6 million dollars in a Ro/Ro ramp which solved the immediate need when environmental issues impacted the Lutak Dock making it unusable for pass/pass operations. The need still remains for improving the uplands cargo area and a very real risk exists for the current seawall failing. When you combine the Lutak dock has **“reached the end of its credible 60-year service life and is effectively on borrowed time”** (*PND Engineers assessment*) and the Federal funding opportunity we support the completion of this project now.

Sincerely,

A handwritten signature in black ink that reads 'Adam S. Anderson'.

Adam S. Anderson
Southeast Regional Manager
100 Mt. Robert St.
Juneau, AK 99801
adama@lynden.com
907-419-5600

Hi Annette,

My apologies for the delay in responding- it's been a busy month. As a tenant of the Haines Borough, Delta Western supports reliable operations, and is therefore in favor of the rehabilitation of the Lutak Dock. Should the dock not be rehabilitated, there could be an increased risk of fuel shortage to the residents of the Haines Community. The only alternative to delivering fuel via barge is delivery by truck, which is not as safe or environmentally friendly as delivering fuel via barge.

Jake Eckhardt

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