August 2, 1990
RP:0131

Lt. Col. Donald T. Wynn
District Engineer (PODCO-0)
U.S. Army Corps of Engineers
Building 230
Ft. Shafter, Hawaii 96858

Dear Lt. Col. Wynn:

Application for Department of Army Permit #2155
Marina Improvements
Malakal, Koror, Palau

The Environmental Center has conducted a brief in-house review of the above referenced document with the assistance of William Grannis.

The applicant proposes to fill a shoaled area to improve an existing marina. A concrete-block bulkhead will be installed to retain the fill and match the existing bulkhead on the north side of the marina. There will be no dredging, and the fill will come from an upland quarry site on Malakal.

We have identified the following subjects which we feel were inadequately addressed in the permit application.

Siltation

The document fails to discuss how siltation will be controlled. We recommend that siltation curtains be used to prevent potential harm to nearby marine habitat.

Engineering Concerns

There is a question as to how the fill is supported on the South side. Will the fill itself be adequately supported to prevent slippage? In addition, what is the intended use of the proposed fill. Possible secondary impacts associated with the intended use of the facility should be addressed in the permitting process.
The permit application states that "removal of the barges will be an aesthetic improvement." However, there is no mention as to where or how the barges are to be relocated. If it is the applicant's intention to sink the barges at sea, an ocean dumping permit will be required.

Thank you for the opportunity to review this document.

Yours truly,

John T. Harrison Ph.D.
Environmental Coordinator

cc: OEQC
L. Stephen Lau
William Grannis