



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

October 22, 2002

V.K. Holtzman-Bell  
Commander, United States Coast Guard  
P.O. Box 21747  
Juneau, AK 99802-1747

Attn: Ben White

RE: Draft Environmental Assessment for U.S. Coast Guard  
Helicopter Landing Pad Replacement at Craig, Alaska;  
Essential Fish Habitat Assessment and Request for  
Concurrence

Dear Commander Holtzman-Bell:

The National Marine Fisheries Service has reviewed the Essential Fish Habitat (EFH) Assessment and Draft Environmental Assessment for the U.S. Coast Guard Helicopter Landing Pad Replacement at Craig, Alaska. NMFS has determined that the 0.46 acre of fill in the intertidal zone below Mean High Water would adversely affect EFH. This determination is based on the presence of EFH for numerous species in the area (as indicated in your EFH Assessment), the potential for construction to affect adjacent eelgrass beds through sedimentation, and the loss of intertidal habitat that both directly and indirectly supports federally managed species of fish and shellfish.

NMFS EFH Conservation Recommendations for this project are as follows. The first two recommendations are similar to those proposed in your EFH Assessment. The remaining recommendations are new.

- 1) In-water work should not occur from March 15 to June 15 of any year to avoid disturbance to migrating juvenile salmon and spawning Pacific herring in the project vicinity.
- 2) Silt fencing or other effective erosion prevention should be installed and maintained during the construction phase of the project to prevent suspended sediments from entering the surrounding area and settling on eelgrass beds.



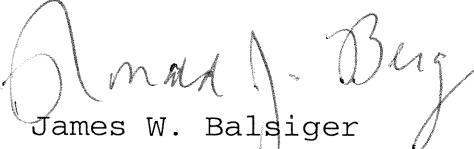
- 3) The access road to the new helicopter landing pad should be built with vertical sheetpile to prevent the toe of fill from encroaching on the adjacent intertidal habitat.
- 4) The helicopter landing pad should utilize a boulder/rip-rap toe of fill to maximize colonization potential for intertidal organisms. The side slopes for the fill should be designed as steeply as possible to minimize the overall area required for the fill pad.
- 2) As mitigation for the loss of 0.46 acre of intertidal EFH, the condemned helicopter landing pad should be excavated to allow intertidal inundation. The site will be excavated to restore the area to the approximate conditions of the surrounding intertidal habitat.

NMFS notes that the condemned helicopter landing pad is considered undesirable for future use because of the noise nuisance it poses to nearby residences. Restoration of the site to intertidal habitat would remove the possibility of the site being used for helicopter landings. The pad may also serve as a fill source for the new helicopter pad.

Please note that under section 305 (b) of the Magnuson-Stevens Fishery Conservation and Management Act, the U.S. Coast Guard is required to respond in writing within 30 days to NMFS EFH Conservation Recommendations. If your agency will not make a decision within 30 days, you should provide NMFS a letter to that effect, and indicate when a full response will be provided.

Thank you for your continued coordination. The contact for this project is Linda Shaw at 907-586-7510.

Sincerely,

  
James W. Balsiger  
Administrator, Alaska Region

cc: ADEC, AADGC, ADNR  
ADF&G, Klawock, Mark Minnillo  
EPA Anchorage, Mark Jen  
USFWS, Juneau  
Lori Durall, NMFS