



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

April 26, 2004

Kenneth D. Vaughan
USDA
Forest Service, Alaska Region
P.O. Box 21628
Juneau, Alaska 99802-1628

Re: EFH Conservation Recommendations
Coffman Cove Ferry Terminal

Dear Mr. Vaughan:

Thank you for taking the time to meet with National Marine Fisheries Service (NMFS) staff regarding our Essential Fish Habitat (EFH) conservation recommendations for the Coffman Cove Ferry Terminal. Based on the information provided in your April 16, 2004 letter and our meeting, NMFS has revised conservation recommendation #3 and #4 as follows:

3. NMFS understands that pile driving will be conducted from a barge and that, therefore, it will not be possible to drive piles during low tide as originally recommended. Your letter indicates that most piles could be driven to depth with a vibratory hammer or by drilling prior to driving. NMFS' reason for originally recommending that you limit pile driving to low tidal stages was to decrease noise in shallow water from the use of an impact hammer. Since you plan to use a vibratory hammer to the extent practicable, NMFS concurs that EFH will be adequately protected.
4. During our meeting, Mr. Kirk Miller, ADOT, raised some questions regarding the use of the 180 dB re μ Pa threshold specified in NMFS' conservation recommendation for reducing injury to fish. He pointed out that the threshold does not provide enough specification on the range or depth at which the measurements should be taken to allow the standard to be incorporated into a contract for the construction work. Further, we discussed the purpose of the standard, which is to protect primarily benthic fish from swim bladder injury due to sound pressures from impact hammers. Given the small number of piles to be driven for this project, the relatively small diameter of the piles, and the intention to drive as many piles as possibly using a vibratory hammer, substantial injury to fish will not likely occur as a result of pile driving for this project. Therefore, we revise our conservation recommendation to state:

"Measures to reduce the impacts from pile driving sound pressures should be implemented if peak sound pressure levels from pile driving exceed 180 dB re μ Pa, and monitoring of pile driving activities indicates evidence of fish mortality or injury (e.g. floating or injured fish in the vicinity of the project). Fish injury or mortality should be

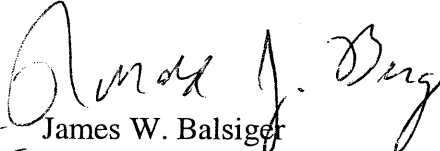


assessed through visual scanning of the water surface at regular intervals during pile driving”.

As indicated during the meeting, NMFS is currently in the process of developing standardized conservation recommendations for pile driving and treated wood use. I appreciate your interest in assisting in this process by reviewing and providing comments on these recommendations when they are developed.

If you have any questions regarding this letter, please contact Katharine Miller at 907-586-7643.

Sincerely,


James W. Balsiger
For Administrator, Alaska Region