



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

November 30, 2005

Colonel Timothy J. Gallagher
District Engineer
U.S. Army Corps of Engineers
P.O. Box 898
Anchorage, Alaska 99506-0898

Re: POA-1922-22-Y
Tongass Narrows

Attn: Shannon Hanson

Dear Colonel Gallagher:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced proposal to expand the existing cruise ship berthing facilities in Ketchikan to include two new cruise ship berths; remove structurally deficient areas of existing pilings and docks and replacement with concrete decking and steel pilings; and construct a 1,200 foot long waterfront promenade.

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act requires Federal agencies to consult with NMFS on all actions that may adversely affect Essential Fish Habitat (EFH). NMFS is required to make conservation recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset potential adverse effects. Juvenile salmon use the inshore area of Tongass Narrows during spring and early summer for feeding and predator avoidance prior to migration out to sea. A small portion of the inshore area of the project location also provides habitat for several marine species including arrowtooth flounder, Pacific cod, sablefish, sculpins, walleye pollock, yellow rockfish, and Pacific ocean perch.

The Corps has determined that the project may adversely affect EFH. NMFS concurs with this determination. To reduce potential impacts to EFH, the applicant proposes to limit in-water construction activities to September 2006 through May 2007 for Berth 3 and September 2007 to June 2008 for Berth 4. The proposed in-water construction windows coincide with spring out migration of juvenile salmon.

We offer the following EFH Conservation Recommendations pursuant to Section 305(b)(4)(A) of the Magnuson-Stevens Act:

1. No in-water work should be permitted from April 1 through June 15 of any year to protect out migrating salmon.

For pile driving activities, the following are specifically recommended to reduce sound pressure levels that may harm fish.



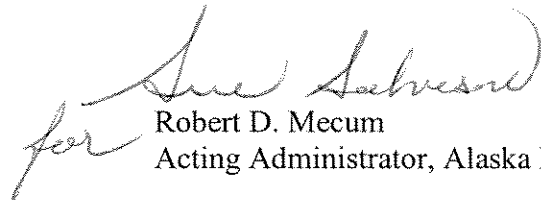
2. Drive piles with a vibratory hammer. If an impact hammer is required because of substrate type or the need for seismic stability, piles should be driven as deep as possible with a vibratory hammer before the impact hammer is used. Vibratory hammers generally produce less intense sounds than impact hammers (NMFS, 2005). Further, fish have been observed to avoid sounds similar to those produced by vibratory hammers and to remain within the field of harmful sound associated with an impact hammer (Dolat, 1997).
3. Surround piles with an air bubble system. The use of both confined and unconfined air bubble systems may attenuate underwater sound pressure levels up to 28 dB re: 1 μ Pa (NMFS 2005).
4. Reduce force used to drive the pile by using a smaller hammer or a hydraulic hammer for which the force of the hammer blow can be controlled (NMFS 2005).

Under section 305(b)(4) of the Magnuson-Stevens Act, the Corps is required to respond to NMFS EFH recommendations in writing within 30 days. If the Corps will not make a decision within 30 days of receiving NMFS EFH Conservation Recommendations, the Corps should provide NMFS with a letter within 30 days to that effect, and indicate when a full response will be provided.

The applicant has indicated that blasting is not currently planned for the project. If blasting becomes necessary, a blasting plan should be prepared and provided to NMFS for review and recommendation of measures to minimize impacts to EFH, marine mammals and endangered and threatened species.

Please contact Katharine Miller at (907) 586-7643 if you have any questions.

Sincerely,


for Robert D. Mecum
Acting Administrator, Alaska Region

Enclosure

cc: Applicant
EPA Juneau, Chris Meade
ADF&G
ADEC, AADGC, ADNR, USFWS, Juneau

Literature Cited

Dolat, S.W. 1997. Acoustics measurements during the Baldwin Bridge Demolition (final, dated March 14, 1997). Prepared for White Oak Construction by Sonalysts, Inc., Waterford, CT/34 pp + appendices.

National Marine Fisheries Service. 2005. Final Environmental Impact Statement, Essential Fish Habitat Identification and Conservation in Alaska, Vol. 2, Appendix G; National Marine Fisheries Service, Department of Commerce. April, 2005.