



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

October 2, 2005

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

Re: POA-2005-1062-2
Sitka Sound

Attn: John Klutz

Dear Colonel Gallagher:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced proposal by the Alaska Department of Natural Resources to expand a boat ramp facility, construct an earthen breakwater and wave barrier, and expand parking facilities in Starrigaven Bay, near Sitka, Alaska for the purpose of reconfiguring an existing boat ramp for expanded use at all tidal stages, reducing wave action on the ramp area with construction of a breakwater and wave barrier and providing for better traffic flow and additional parking.

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. Several anadromous fish streams are located within five miles of the project site. Consequently, juvenile salmon use the inshore areas of Sitka Sound during spring and early summer for feeding and predator avoidance prior to migration out to sea. Your public notice for this project further notes that the project may adversely affect approximately 11 acres (harbor interior) of EFH for juvenile/adult salmon, groundfish, crab, scallops and associated species, such as major prey or predator species, not covered by a fishery management plan. The project location is noted as a special aquatic site, "vegetated shallows", which is characterized by 10-20% cover of the brown algae *Fucus*, which diminishes with depth. *Fucus* commonly colonizes riprap structures in southeast Alaska and may colonize the breakwater for this project.

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

1. For the wooden components of the new structures (new timber boarding float and timber sleeper), the use of any wood that has been surface or pressure-treated with creosote or treated with pentachlorophenol should be prohibited and alternatives to treated wood that have no or reduced toxicity should be used wherever practicable.
2. Any wood that comes in contact with marine or aquatic environments should be treated with waterborne preservatives approved for use in aquatic and/or marine environments. These include, but are not limited to: Chromated Copper Arsenic (CCA) Type C,



Ammoniacal Copper Zinc Arsenate (ACZA), Alkaline Copper Quat (ACQ), Copper Boron Azole (CBA) or Copper Azole (CA). The applicant should only use wood that has been treated in accordance with best management practices developed by the Western Wood Preservers Institute. Treated wood should be inspected before installation to ensure that no superficial deposits of preservative material occur on the wood.


3. Over-water wood structures should be designed to prevent abrasion and splintering of treated wood.
4. All cutting and boring of treated wood should take place in upland areas; all waste materials should be kept out of the aquatic environment and be properly disposed of upland. Treated wood materials should not be stored in-water. Any cut wood, chips or sawdust from treated wood should be collected promptly and disposed of at an acceptable upland site.
5. All work below the high tide line should be limited to low tidal stages to reduce turbidity.
6. No in-water work should occur from April 1 through June 15 of any year to protect out migrating juvenile salmon.

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

7. 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).
8. 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).
9. 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).
10. The applicant has indicated that blasting is not currently planned for the project but may become necessary to place pilings. The applicant should determine as soon as possible if blasting is necessary. If blasting is 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.

If you have any further questions, please contact Linda Shaw at 907-586-7643.

Sincerely,


James W. Balsiger
for Administrator, Alaska Region

cc: Applicant
*EPA Juneau, Chris Meade
*ADF&G, Tom Schumacher
ADEC, ADNR, USFWS, Juneau
*email

Literature Cited

Dolat, S.W. 1997. Acoustic 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.