



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

February 14, 2004

Mark Anderson
Project Environmental Coordinator
Alaska Department of Transportation and Public Facilities
6860 Glacier Highway
Juneau, Alaska 99801-7999

RE: Tenakee Seaplane Facility
State Project 67923

Dear Mr. Anderson:

The National Marine Fisheries Service (NMFS) reviewed the Alaska Department of Transportation and Public Facilities' (DOT&PF) January 27, 2005, request for comments on the essential fish habitat (EFH) assessment for the Tenakee Seaplane Facility Rehabilitation, project number 67923. DOT&PF's EFH Assessment adequately describes the potential impacts to EFH and includes all of the EFH Conservation Recommendations that NMFS made in our November 22, 2004, letter except that the assessment does not state what measures will be implemented to reduce impacts from pile driving sound pressure if monitoring indicates evidence of fish mortality or injury.

The EFH Assessment states: "It is unlikely that sound pressure from driving these small pilings will create adverse effects to fish" and "Measures to reduce impacts from pile driving sound pressure will be implemented if monitoring indicates evidence of fish mortality or injury."

In NMFS's November 22, 2004, letter to you, we offered these specific comments and EFH Conservation Recommendations to address the effects of noise on fish:

Pile-driving can disrupt migration and cause physical damage to fish. To the extent possible, drive piles during low tide periods in intertidal and shallow subtidal areas to prevent injuries to fish. We support your planned use of a vibratory hammer to drive the steel piles and only using an impact hammer to proof each piling at bearing depth. Under those conditions where impact hammers are required for reasons of seismic stability or substrate type, we recommend that the piles be driven as deep as possible with a vibratory hammer prior to the use of the impact hammer. A block of wood placed between the impact hammer and the piling is recommended to attenuate the sound. If peak sound pressure levels from deepwater pile driving exceed the threshold for injury to fish (which is unlikely if small diameter piles are used) implement measures to reduce sound pressure such as: surrounding the pile with an air bubble curtain,

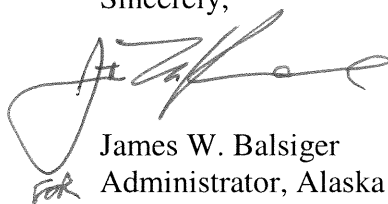


using a smaller hammer to reduce the sound pressure, or using a hydraulic hammer if impact driving cannot be avoided.

NMFS recommends that the Environmental Assessment for the project include a description of the process and measures to be taken if evidence of fish mortality or injury occurs.

If you have any questions regarding our comments and conservation recommendations for this project, please contact Cindy Hartmann (586-7585, cindy.hartmann@noaa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Balsiger', with a stylized flourish at the end.

James W. Balsiger
Administrator, Alaska Region

cc: USFWS, Juneau
EPA, Juneau
ADNR-OHMP, Juneau
ADF&G, Tom Schumacher, Juneau