



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

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

December 3, 2007

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

Re: POA-2005-75-4  
Tongass Narrows

Attn: Ms. Robin Leighty

Dear Colonel Wilson:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced application by the Ketchikan Gateway Borough to place 92,052 cubic yards (cy) of shot rock and 2,500 cy of crushed aggregate fill into waters of the United States, including wetlands, to construct 1.3 miles of a 28 foot wide roadway with 37 individual waterfront subdivision driveway aprons on North Gravina Island. The purpose of the project is to provide access for industrial, residential and recreational economic development. The project would remove all vegetation and unsuitable organic material along a 120 foot right-of-way and consist of seven permeable roadbed sections interspersed along the corridor running north from the Pacific Log and Lumber (Seley) sawmill site terminating at a cul-de-sac. An additional 250,000 cy of non-usable excavated material and 40,000 cy of shot rock would be placed into wetlands at a proposed waste area and rock quarry location near the sawmill. The project would cross 10 non-anadromous streams with one of nine 24 inch diameter culverts placed at each stream crossing and one 96 inch diameter culvert at the tenth stream crossing. No mitigation has been proposed for this project.

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 adverse effects. Although the streams that the proposed road is crossing are not anadromous, the Alaska Department of Fish and Game's Anadromous Waters Catalog identifies several anadromous streams in the vicinity of the project that drain into Tongass Narrows. These streams support runs of pink, coho, and chum salmon. Juvenile salmon use nearshore habitat during spring and early summer for feeding and predator avoidance prior to migration out to sea. In addition to Pacific salmon, the NMFS Nearshore Fish Atlas indicates that the following species utilize nearshore habitat in the vicinity of the project: sculpin, flatfish, forage fish species, and Pacific sand lance.

The Corps has concluded that "[p]reliminarily the described activity will not affect EFH in the project area." NMFS agrees with this preliminary assessment. However, NMFS foresees future cumulative effects associated with the project that might be minimized or avoided prior to




project approval. The proposed road design includes no utility plans for water or sewer line construction for the intended development. With the stated purpose of the road facilitating industrial and residential development the addition of utility corridors into construction plans should be considered. Development of a community wastewater disposal system on the island would further avoid potential sewage discharge into marine waters, reducing impact on nearshore EFH.

The above comments constitute NMFS' conservation recommendations for this project in accordance with Section 305(b)(4)(A) of the Magnuson-Stevens Act. 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.

Please contact Tim Wilkins at 907-586-7643 or email, [Timothy.Wilkins@noaa](mailto:Timothy.Wilkins@noaa), if you have any questions or for further coordination.

Sincerely,

  
for James W. Balsiger  
Administrator, Alaska Region

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