**UNITED STATES DEPARTMENT OF COMMERCE**
**National Oceanic and Atmospheric Administration**
*National Marine Fisheries Service*
*P.O. Box 21668*
*Juneau, Alaska 99802-1668*

December 23, 2002

Colonel Steven T. Perrenot
District Engineer
U.S. Army Corps of Engineers
Alaska District
P.O. Box 898
Anchorage, Alaska 99506-0898

Re: 2-2002-1281
Iliamna Bay 2

Attn: Dennis Stone

Dear Colonel Perrenot:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced proposal by Wilder Construction Company. The proposed project involves dredging approximately 25,000 cubic yards of material through mud flats to create a 60-foot by 1,350-foot channel with a three- to six-foot depth and 4:1 side slopes. Dredge material will be side cast onto the mud flats on either side. Work is proposed to begin after April 1, 2003, and be completed before June 1, 2003. The applicant also requests authorization to perform maintenance dredging (approximately 6,000 cubic yards) once a year for five years to maintain the channel, again between April 1 and June 1.

The U.S. Army Corps of Engineers (Corps) has made a determination that the project will not adversely affect Essential Fish Habitat (EFH). NMFS disagrees with this determination. The Magnuson-Stevens Fishery Conservation and Management Act requires NMFS to make conservation recommendations to the Corps if we believe the project would adversely affect EFH. The construction and operation of the proposed project would adversely affect EFH for pink salmon (*Onchorynchus gorbuscha*), chum salmon (*Onchorynchus keta*), and Pacific herring (*Clupea pallasii*) if necessary conservation measures are not followed.

**EFH Conservation Recommendations**

Iliamna Bay is a major spawning area for Pacific herring in Cook Inlet. Spawning begins in mid-April, with egg incubation, hatching, and dispersal of juvenile fish through May. Iliamna Bay also supports large runs of pink and chum

salmon in Williams Creek. Out-migrating smolts use the nearshore waters of the bay as a nursery area, gaining energy stores and growth before becoming fully pelagic. The out-migration period and nearshore habitat use occur from approximately late May through July 15. The following conservation recommendations will lessen project impacts to EFH:

1. Dredging should be completed prior to April 15 and/or after July 15.

   *Rationale - This is important EFH for Pacific herring, chum salmon, and pink salmon. Suspended sediment from dredging operations can impact feeding efficiency of adult and juvenile fish, disturb adult herring from spawning, and smother eggs. Generally, spawning adult Pacific herring do not aggregate in Iliamna Bay until mid-April. Restricting work outside the April 15 to May 30 window will lessen impacts to Pacific herring adults, eggs, and juveniles. Restricting work outside the May 15 to July 15 window will lessen impacts to pink salmon and chum salmon smolt which use habitat in nearshore waters of the bay for growth prior to the pelagic life stage. Juvenile salmonids have, for the most part, moved out of the nearshore habitat by mid-July.*

2. If possible, dredge material should be disposed of at an upland site. Alternatively, during construction, the dredge material should be graded each work shift to prevent the creation of pools on the fill surface that could trap out-migrating salmon and other marine fishes between high tides.
   *Rationale - Dredge spoils, as they are reworked by strong tidal action, can create pools that trap out-migrating juvenile salmon and other marine fish species. These trapped fish often die.*

In conclusion, NMFS is concerned about the effects of the proposed dredging on EFH in Cook Inlet. NMFS recommends that any Corps permit for this project include the conservation recommendations above as conditions of the permit. These recommendations will allow the applicant to complete the project, and will lessen the impacts to EFH in the project area.

Please note that under section 305 (b)(4) of the Magnuson-Stevens Act, the Corps is required to respond in writing within 30 days to NMFS recommendations. If the Corps does not make a decision within 30 days of receiving NMFS EFH Conservation Recommendations, the Corps should provide NMFS with a letter to that effect, and indicate when a full response will be provided. Brian Lance is the NMFS contact for this project and can be reached by telephone at (907) 271-1301. Thank you for the opportunity to comment.

Sincerely,

For James W. Balsiger
Administrator, Alaska Region

cc: USFWS, EPA, ADGC, ADFG, ADEC - Anchorage
Applicant