

UNITED STATES DEPARTMENT OF COMMERCE National Oceanic and Atmospheric Administration

National Marine Fisheries Service P.O. Box 21668 Juneau. Alaska 99802-1668

August 18, 2003

Pete Griffin Juneau District Ranger U.S. Forest Service 8465 Old Dairy Road Juneau, AK 99801

RE: Greens Creek Tailings Disposal EFH
Assessment

Dear Mr. Griffin:

Based on the results of our meeting last Friday August 15, 2003, the National Marine Fisheries Service (NMFS) is providing the following recommendations for changing the current program for sampling marine sediments and biota at the Greens Creek Mine. These recommendations may be incorporated as minimization of and mitigation for impacts to Essential Fish Habitat (EFH) in the revised EFH Assessment to be included in the FEIS.

- 1) For sediment samples, include data on grain size of sediments collected at all sampling sites. This information will make possible the evaluation of the level of potential contamination of sediment since concentrations of metals in sediment vary as a function of grain size. This information is also necessary to make viable comparisons between samples from different sampling sites.
- 2) Collect multiple samples for each site for both tissue and sediment. Without this information, determining whether variation in the data is the result of changes in discharges, sampling bias due to non-homogenous distribution of contaminants at a sampling site, or changes in the level of contaminants in sediment and tissue is not possible.
- 3) Conduct surveys for benthic community structure. These surveys will assist in assessing the abundance of prey and for ascertaining whether any changes have occurred in the availability of prey for managed species.
- 4) Sampling of resident fish. This information will assist in determining whether contaminants are bioaccumulating or biomagnifying.



NMFS staff would be happy to work with you to further refine these recommended changes to the marine monitoring program, and to develop an implementation schedule and approach. Please contact Katharine Miller at (907) 586-7643 if you have any questions.

Sincerely,

James W. Balsiger

Administrator, Alaska Region

cc: James P. Burgess, NEPA Coordinator, NOAA Office of Strategic Planning EPA Juneau, Chris Meade USACOE, Colonel Griffith ADEC, ADF&G, ADNR, USFWS, Juneau