



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

August 22, 2003

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

RE: Sitka Sound 153
M-1978-0193

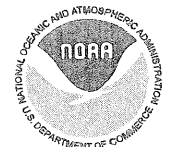
Attn: Ms. Val Glooschenko

Dear Colonel Gallagher:

The National Marine Fisheries Service (NMFS) has reviewed the proposal by Mr. Kevin and Mrs. Tina McNamee to fill 9,100 square feet below the high tide line in Sitka, Alaska for construction of a 30 foot by 150 foot two story building with office and gear storage. The purpose of the project is to provide ocean front lodging for charter fishing clients next to an existing boat dock. An eelgrass bed is located 118 feet seaward of the project's proposed toe of fill.

NMFS has identified essential fish habitat (EFH) in the project area as follows: walleye pollock eggs, larvae, juveniles, and adults; dusky rockfish; flathead sole; Pacific cod; Pacific ocean perch; rock sole; shortraker and roughey rockfish; sablefish; sculpin; skates; yelloweye rockfish and all five species of Pacific salmon (chinook, coho, chum, sockeye and pink.) In addition, a number of Alaska Department of Fish and Game cataloged anadromous fish streams are distributed throughout the project area (see USGS Quad Sitka, A-5, streams # 113-41-10148, -10150, -10153, -10160, -10170, -10175, -10180, -10185), which collectively support spawning and rearing habitat for pink, chum, and coho salmon, and Dolly Varden char. These streams likely contribute to client catches for the applicant's sport fishing charters.

EFH in the project area is enhanced by the presence of the eelgrass bed. The ecological role and value of eelgrass has been well documented (Kurland 1994; Thayer et al. 1997; Fonseca et al., 1998). Studies, including several in Alaska, have shown the importance of eelgrass as spawning and nursery areas for herring, juvenile Pacific cod, juvenile chum salmon, juvenile rockfish (Murphy et al., 2000), and Dungeness crab (Phillips, 1984; Stevens and Armstrong, 1984). One such study was completed in Sitka not far from the project site (M.Byerly, Master's thesis, personal communication). In addition to providing nursery areas for commercially valuable fish species, eelgrass beds stabilize nearshore sediments, improve water clarity and quality, and



contribute both primary and secondary productivity to the marine environment (Fonseca et al., 1998.)

Placement of intertidal fill for the project, with its fairly steep 1.5:1.0 slope, will alter current, wave and boat wake reflection patterns by shortening the distance they travel from shore to the eelgrass bed. This will affect the eelgrass bed by exposing it to higher energy. The effects may be negative by increasing turbidity (and thereby lowering light penetration), eroding substrate sediments and dislodging roots. At Juneau's Auk Nu Cove, where Alaska Marine Highway ferry terminal expansion has introduced similar effects, the eelgrass bed has been documented to be shrinking. From 1984 to 2002, this bed has shrunk by 73%.

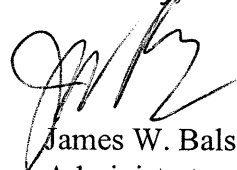
Eelgrass is classified as a special aquatic site by the Environmental Protection Agency's Clean Water Act 404(b)(1) guidelines. The guidelines' recognition of the value of this habitat underscores the importance of considering modifications to projects to avoid impacts to this resource. NMFS has concluded, pursuant to Section 305(b)(4)(A) of the Magnuson-Stevens Fishery Management and Conservation Management Act (MSFCMA), that this project would adversely affect EFH. We, therefore, offer the following **EFH conservation recommendations**.

- The applicant should investigate and report on the feasibility of using pilings instead of fill to support the proposed building. Pilings would allow greater dissipation of wave, wake and current energy than fill, and thereby avoid increased energy stress on the eelgrass bed. Pilings would also maintain shallow nearshore habitat for migrating juvenile salmonids, and provide surface area for growth of sessile marine organisms.

Please note that under section 305(b)(4) of the MSFCMA, the Corps is required to respond to NMFS EFH conservation 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.

If you have any further questions, please contact Linda Shaw of my staff at 907-586-7510.

Sincerely,



James W. Balsiger
Administrator, Alaska Region

cc: Mr. Kevin and Mrs. Tina McNamee, applicant
ADEC, ADNR, USFWS, EPA Juneau

LITERATURE CITED

- Fonseca, M. S., W. J. Kenworthy, and G.W. Thayer. 1998. Guidelines for the Conservation and Restoration of Seagrasses in the United States and Adjacent Waters. NOAA's Coastal Ocean Program Decision Analysis Series No. 12. U.S. Dept. Of Commerce, National Oceanic and Atmospheric Administration, Coastal Ocean Office.
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- Stevens, B.G. and D.A. Armstrong. 1984. Distribution, abundance and growth of juvenile Dungeness crabs, *Cancer magister*, in Grays Harbor Estuary, Washington. Fish Bulletin 82:469-483.
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