



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: Wrangell Narrows 139
O-1978-0272

Attn: Ms. Shannon Hansen

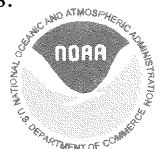
Dear Colonel Gallagher:

The National Marine Fisheries Service (NMFS) has reviewed the proposal by Petersburg Shipwrights to expand and upgrade an existing ship repair operation to improve access to a marine haul-out facility by sizeable vessels during high tide. The addition of fill by the project would allow accommodation of as many as five vessels at one time. New work associated with the project includes dredging of 7,000 cubic yards of material from 1.0 acre below the high tide line to a depth of -12 mean lower low water; placement of 38,000 cubic yards of fill material into 1.3 acre of area below the high tide line; and construction of a 20-foot by 100-foot crane wharf in approximately 0.1 acre below the high tide line.

The Corps suspects that dredge materials for this project are contaminated, but has indicated to NMFS that testing will not be done because dredge spoils will be contained in a fill embankment area behind a timber-faced, geotextile lined retaining wall, reinforced with three foot thick rip rap. The Corps has further stated that the upgrades to this project will allow the applicant to collect runoff from ship repair operations, containing paints, oils, solvents, and other toxic substances, and properly dispose of such runoff at an approved landfill. NMFS agrees that this feature of the project will reduce future contamination of nearby marine waters.

According to the Corps, new work associated with the project may adversely affect 2.4 acres of essential fish habitat (EFH) for juvenile and adult salmon and groundfish by dredging and direct fill. NMFS agrees, and pursuant to Section 305(b)(4)(A) of the Magnuson-Stevens Fishery Management and Conservation Management Act (MSFMCA), we offer the following **EFH conservation recommendations**.

1. No work shall occur below ordinary high water during the period March 15 through May 30 to minimize disturbance to out-migrating juvenile salmonids.

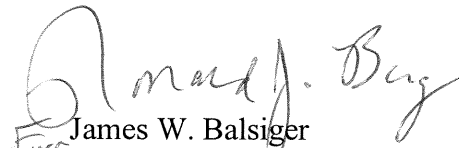


2. The applicant shall investigate and report on the feasibility of using a dredge other than a clamshell bucket, such as a hydraulic pipeline/cutterhead dredge. Clamshell bucket dredges expose dredge materials to the water column thereby resulting in increased turbidity, suspended solids, and exposure of contaminants to the marine environment. Particularly because dredge materials are suspected of being contaminated for this project, a dredging system that keeps materials isolated to the fullest extent from mixing with the water column should be used.

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: Petersburg Shipwrights, applicant
ADEC, ADNR, USFWS, EPA Juneau
ADNR, Petersburg (Jim Cariello)