

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

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

September 15, 2003

Ken Vaughn Deputy Director for Engineering U.S. Forest Service P.O. Box 21628 Juneau, AK 99802

RE: EECA Ratz Harbor Former Shop Area

Dear Mr. Vaughn:

The National Marine Fisheries Service (NMFS) has reviewed the Engineering Evaluation/Cost Analysis (EECA) for the Ratz Harbor Former Shop Area Site prepared in support of a Non-Time Critical Removal Action planned by the US Forest Service and Ketchikan Pulp Company. The site was used for logging support and maintenance activities from 1959 until 1967. The proposed removal action involves excavation and off-site disposal of soils contaminated with lead and petroleum hydrocarbons. Battery debris and contaminated sediments will be removed from the intertidal area adjacent to the Buried Debris Lens.

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. For the purposes of this EECA, EFH includes all segments of streams where salmon reside during any period of the year as well as the marine waters and substrates of Clarence Strait. These areas provide habitat for a number of anadromous and marine species including all five species of Pacific salmon, arrowtooth flounder, dusky rockfish, Pacific cod, sablefish, yelloweye rockfish, shortraker rougheye rockfish and sculpins.

The EECA Essential Fish Habitat Assessment concludes that the proposed action would have a temporary impact on EFH during sediment removal. These areas are expected to be quickly recolonized by benthic organisms. Overall, the proposed action will have a beneficial impact on EFH by decreasing contaminant concentrations in the intertidal sediments. To reduce potential impacts to migrating salmon from increased sedimentation, NMFS offers the following additional conservation recommendation:

1. In-water work should not be conducted from March 1 through June 15.



Please contact Katharine Miller at (907) 586-7643 if you have any questions regarding this letter.

Sincerely,

James W. Balsiger

Administrator, Alaska Region

cc: EPA Juneau, Chris Meade
ADEC, ADF&G, AADGC, ADNR, USFWS, Juneau