



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

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

April 25, 2003

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

Re: U-1982-0204
Gastineau Channel 350

Attn: Randal P. Vigil

Dear Colonel Perrenot:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced proposal by Salmon Creek Development Company. The proposed project involves discharge of approximately 1,050 cubic yards of fill into approximately 0.10 acre of Gastineau Channel for construction of a storm water drainage system and to provide additional space for freight operations.

The U.S. Army Corps of Engineers (Corps) has made a determination that the project may adversely affect EFH. NMFS agrees with this determination. The Magnuson-Stevens Fishery Conservation and Management Act requires NMFS to make conservation recommendations regarding any federal action that would adversely affect EFH. The construction and operation of the proposed project would adversely affect EFH, and marine and anadromous fish, if necessary conservation measures are not followed.

A number of anadromous fish streams are located within Gastineau Channel (Juneau Quad, B-2, #111-40-10890, -10200, -10900, -10910, -10920) supporting runs of coho salmon (*Onchorynchus kisutch*), pink salmon (*Onchorynchus gorbuscha*) and chum salmon (*Onchorynchus keta*). In addition, Gastineau Channel includes EFH for several species of groundfish, and of these, sculpins (Cottidae) and Pacific cod (*Gadus macrocephalus*) would be the most likely to utilize the nearshore area of the project. NMFS' primary concern is the potential impact of construction activities on outmigrating salmonid smolts that use the project area during the critical osmoregulatory shift from fresh to salt water. Further, NMFS is concerned that stormwater runoff from parking and work areas, containing sediment and



petroleum products, will affect water quality of nearshore marine waters. We offer the following recommendations pursuant to section 305(b)(4)(A) of the Magnuson-Stevens Fishery Conservation and Management Act.

EFH Conservation Recommendations

1. The applicant should design, maintain, and monitor an oil/water separator or equivalent system that removes total suspended solids (TSS) and oil and grease from the harbor parking lot drainage at an effective removal rate of not less than 99%.

Rationale - Non-point source pollution can have deleterious effects on salmonids, particularly growth in juveniles. Petroleum hydrocarbons are damaging to developing salmon eggs, larvae, and fry at extremely low concentrations. Sculpin eggs and larvae, and juvenile Pacific cod, which occur in nearshore areas, would likely experience similar effects.

2. The applicant should submit an annual report containing results of monthly monitoring for TSS and oil and grease to the Corps and NMFS.

Rationale - A report will demonstrate compliance with conservation recommendation # 1. Also, monitoring the performance of the oil water separator will determine if this treatment system is adequate to protect EFH.

3. In-water construction work should be avoided from March 1 through June 30 to avoid disturbance to outmigrating salmonid fry and smolt.

Rationale - Dredging activities can contribute sediment to the marine environment, potentially decreasing fish feeding efficiency and smothering benthic organisms.

4. In-water and intertidal work should be conducted at low tide to the extent possible.

Rationale - Working at low tide will decrease the amount of sediment introduced to the water column.

5. During dredging activities, a silt curtain should be installed and maintained. The curtain should completely enclose the dredge area and remain in place until construction is completed and the side slopes have been stabilized.

Rationale: Dredging activities can contribute sediment to the marine environment, potentially decreasing fish feeding efficiency and smothering benthic organisms. Use of a silt curtain will decrease the size of the affected area.

6. All dredge material should be free of contaminants prior to disposal within the proposed fill area or any offsite location.

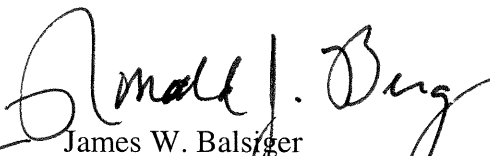
Rationale: Dredging activities have the potential to suspend trapped contaminants into the water column where marine resources could be exposed.

7. Fill below the high tide line should be clean shot rock. Fill should be placed when the site is de-watered by lower tide stages. During construction, the fill site should be graded each work shift to prevent ponding on the fill surface that could trap fishes between high tides.

Rationale: The aforementioned guidelines will minimize disturbance from placement of fill. Fill activities can contribute sediment to the marine environment, potentially decreasing fish feeding efficiency.

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.

Sincerely,


James W. Balsiger
Administrator, Alaska Region

cc: USFWS, EPA, ADGC, ADFG, ADEC - Juneau