



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

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

December 8, 2006

Lynn D. Kolund  
District Ranger  
Ketchikan-Misty Fiords Ranger District  
3031 Tongass Avenue  
Ketchikan, Alaska 99802

Re: Administrative Site Upgrade  
EFH Assessment

Attn: John Lang

Dear Mr. Kolund:

The National Marine Fisheries Service (NMFS) has reviewed the Essential Fish Habitat (EFH) Assessment for the Ketchikan-Misty Fiords Administrative Site Upgrade. The project components that may adversely impact EFH include the construction of a new warehouse and office expansion on pre-existing fill adjacent to Bar Harbor in Tongass Narrows. These structures will be pile-supported utilizing a total of 36 piles, 12 of which would be installed in fill at the toe of the fill slope. Material used in the pilings could include steel, concrete, wood (both treated and untreated), plastic, or a combination thereof.

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) requires federal agencies to consult with NMFS on all actions that may adversely affect EFH. NMFS is required to make EFH Conservation Recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects. Juvenile salmon in Tongass Narrows use nearshore habitat during spring and early summer for feeding and predator avoidance prior to migration out to sea. Tongass Narrows is also utilized by Pacific herring and other fish species that are important prey for MSA species.

In accordance with Section 305(b)(4)(A) of the MSA, NMFS makes the following EFH Conservation Recommendations:

1. No in-water work should be permitted from April 1 through June 15 of any year to protect out-migrating salmon.
2. All intertidal work below the high tide line should occur when tidelands are not submerged to reduce turbidity.
3. Use galvanized steel or concrete piles. If wood piles are used, piles that are surface or pressure-treated with creosote or treated with pentachlorophenol should be prohibited. Creosote contains numerous constituents that are toxic to aquatic organisms including polycyclic aromatic hydrocarbons (PAHs), phenolic compounds, and nitrogen, sulfur, or



oxygenated heterocyclics (Poston, 2001). Leaching of these constituents continues throughout the life of the wood and has been associated with the development of tumors, immune system suppression, decreased fecundity and abnormal embryonic development of fish.

4. Treated wood that comes in contact with water should be treated with waterborne preservatives approved for use in aquatic and/or marine environments. These include, but are not limited to: Chromated Copper Arsenic (CCA) Type C, Ammoniacal Copper Zinc Arsenate (ACZA), Alkaline Copper Quat (ACQ), Copper Boron Azole (CBA) or Copper Azole (CA). Use wood treated with waterborne preservatives in accordance with Best Management Practices developed by the Western Wood Preservers Institute. Treated wood should be inspected before installation to ensure that no superficial deposits of preservative material remain on the wood.
5. All cutting and boring of treated wood should take place in upland areas; all wood waste materials should be kept out of the aquatic environment and properly disposed of. Any cut wood, wood chips, or sawdust from treated wood that enters the aquatic environment should be collected and promptly disposed of at an acceptable upland site.
6. Drive piles with a vibratory hammer. If an impact hammer is required because of substrate type or the need for seismic stability, piles should be driven as deep as possible with a vibratory hammer before the impact hammer is used. Vibratory hammers generally produce less intense sounds than impact hammers (NMFS 2005). Further, fish have been observed to avoid sounds similar to those produced by vibratory hammers and to remain within the field of harmful sound associated with an impact hammer (Dolat 1997).

If you have any questions regarding our recommendations for this project, please contact John Hudson at 907-586-7639.

Sincerely,



Robert D. Mecum  
Acting Administrator, Alaska Region

cc: EPA Juneau, Chris Meade\*  
ADNR, Mark Minnillo\*  
USFWS Juneau, Richard Enriquez\*  
ADEC Juneau, Brenda Krauss\*

OHMP, Erin Allee\*  
USCOE, Robin Leighty\*

\* e-mail PDF

## **Literature cited**

Dolat, S.W. 1997. Acoustic measurements during the Baldwin Bridge Demolition (final, dated March 14, 1997). Prepared for White Oak Construction by Sonalysts, Inc., Waterford, CT/34 pp + appendices.

National Marine Fisheries Service. 2005. Final Environmental Impact Statement, Essential Fish Habitat Identification and Conservation in Alaska, Vol. 2, Appendix G; National Marine Fisheries Service, Department of Commerce. April, 2005.

Poston, Ted. 2001. *Treated Wood Issues Associated with Overwater Structures in Marine and Freshwater Environments*. White Paper, Washington Department of Fish and Wildlife. <http://wdfw.wa.gov/hab/ahg/overwatr.htm>