



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

January 17, 2006

Randal Vigil
Project Manager
U.S. Army Corps of Engineers
Juneau Regulatory Field Office
8800 Glacier Highway, Suite 106
Juneau, Alaska 99801

Re: POA-2005-2047
Hoonah Harbor

Dear Mr. Vigil:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced proposal by the City of Hoonah to remove and replace an existing float system, and construct a new float system in Hoonah Harbor. The work would include driving a total of 58 steel piles ranging in diameter from 12.75 inches to 18 inches. You have indicated that the proposed work would be minor, would not have significant individual or cumulative impact on environmental values, and should encounter no appreciable opposition.

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 potential adverse effects. Several anadromous fish streams are located within five miles of the project site, collectively supporting runs of coho, chum and pink salmon, and Dolly Varden trout (Alaska Department of Fish and Game anadromous fish catalog stream #s 114-34-10080, 10090, and 10100). Consequently, juvenile salmonids use the inshore areas of the project site when out-migrating to sea. Pile driving could harm juvenile salmonids inside the harbor from sound pressure waves. The confined nature of the harbor would further limit the ability of fish to avoid or escape from acoustic impacts during pile driving.

We offer the following EFH Conservation Recommendations pursuant to Section 305(b)(4)(A) of the Magnuson-Stevens Act:

1. Drive piles at a time of year when juvenile salmonids are not present. No pile driving should be permitted from March 15 to June 15.
2. Drive piles at low tides to reduce sound transmission through the water column.
3. 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).

4. Surround piles with an air bubble system. The use of both confined and unconfined air bubble systems may attenuate underwater sound pressure levels up to 28 dB re:1 μ Pa (NMFS 2005).
5. Reduce force used to drive the pile by using cushion blocks and a smaller hammer or a hydraulic hammer for which the force of the hammer blow can be controlled (NMFS 2005).

If you have any further questions, please contact Linda Shaw at 907-586-7643.

Sincerely,



Robert D. Mecum
Acting Administrator, Alaska Region

cc: Applicant
*EPA Juneau, Chris Meade
*ADF&G, Tom Schumacher
ADEC, ADNR, USFWS, Juneau
*email

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.