UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

November 17, 2006

Colonel Kevin J. Wilson
District Engineer
U.S. Army Corps of Engineers
P.O. Box 6898
Anchorage, Alaska 99506-0898

Re: POA-2006-1252-1
Wrangell Narrows, Grudzien Dock

Attn: Serena Sweet

Dear Colonel Wilson:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced proposal by Mr. Richard Grudzien to install a "T-shaped" 5-foot wide by 700-foot long floating dock, consisting of 35 20-foot long sections and a 5-foot by 20-foot section at the end. The dock would be held in place with 22 3-inch diameter steel piles and six 12-inch diameter steel piles.

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. Numerous anadromous fish streams are located within Wrangell Narrows, collectively supporting runs of coho, chum and pink salmon, and steelhead, cutthroat and Dolly Varden trout (see Alaska Department of Fish and Game anadromous fish catalog for USGS quad Petersburg, C-3). 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 Wrangell Narrows 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 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).

3. If an impact hammer is used, 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, Jim Cariello
ADEC, ADNR, USFWS, Juneau
*email