



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

October 24, 2008

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

Re: POA-1985-636-M2
Klawock Inlet

Attn: Mary Leykom

Dear Colonel Wilson:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced permit application by Viking Lumber Company to construct an airport apron at the Klawock Airport. The apron will be constructed, in part, from wood waste originating from the nearby Viking Lumber Company sawmill. The project is the second phase of an ongoing cooperative effort between Viking Lumber Company and the Alaska Department of Transportation and Public Facilities. The proposed work includes the placement of 61,000 cubic yards (cy) of compacted wood fiber, soil, and shot rock into a 240-foot by 1,230-foot area (7 acres). The fill will consist of 34,000 cy of compacted wood fiber placed in a 3.2-foot layer and covered with 12 mil thick nonwoven plastic membrane. Five-thousand cy of topsoil layered 6-inches thick and 22,000 cy of shot rock layered 24-inches thick will be placed on the plastic membrane. Additionally, a 12-foot (top width) by 370-foot temporary access road will be constructed of wood fiber fill. The project will result in the loss of approximately 3.5 acres of palustrine wetlands. Juvenile coho salmon use a small stream draining from wetlands near the proposed site (Mark Minnillo, Alaska Department of Fish and Game, personal communication).

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 EFH Conservation Recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects.

NMFS is concerned that wood leachates originating from the project may adversely impact downstream EFH. Water percolating through wood waste mobilizes a variety of soluble organic compounds including fatty acids, tannins, lignins, tropolones, and turpenes, compounds which are acidic, of high oxygen demand, and acutely toxic to aquatic organisms (Bailey et al. 1999, Field et al. 1998, Peters et al. 1976, Tao et al. 2005, Taylor et al. 1996, Taylor and Carmichael 2003, Woodhouse and Duff 2004, Zenaitis et al. 2002.). NMFS understands that wood waste was utilized as fill during Phase I of this project and that water quality monitoring associated with Phase I was conducted by the Alaska Department of Environmental Conservation. These data



provide an excellent opportunity to evaluate the quality of effluent water from Phase I relative to state water quality standards.

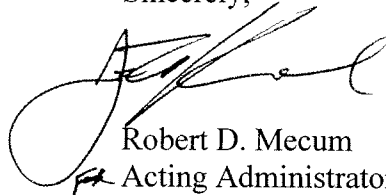
In accordance with Section 305(b)(4)(A) of the Magnuson-Stevens Act, NMFS makes the following EFH Conservation Recommendation:

The results of water quality monitoring associated with Phase I of this project should be analyzed and made available to NMFS and other reviewing agencies. If Phase I effluent does not meet state water quality standards, wood waste should not be allowed as fill material in Phase II of the project.

Under section 305(b)(4)(B) of the Magnuson-Stevens Act the Corps is required to respond to NMFS EFH Conservation Recommendations in writing within 30 days. If the Corps will not make a decision within 30 days the Corps should provide NMFS with a letter within 30 days to that effect and indicate when a full response will be provided.

If you have any questions regarding our recommendations for this project, please contact John Hudson at 907-586-7643 or john.hudson@noaa.gov.

Sincerely,



Robert D. Mecum

Acting Administrator, Alaska Region

cc: Applicant
EPA Juneau, Chris Meade*
ADNR, Mark Minnillo*
USFWS Juneau, Bill Hanson*
ADEC Juneau, Brenda Krauss*
OHMP, Erin Allee*

* e-mail PDF

Literature cited

Baily, H.C., Elphick, J.R., Potter, A., Chao, E., Konasewich, D., and Zak, J.B. 1999. Causes of toxicity in stormwater runoff from sawmills. *Environ. Toxicol. Chem.* 18: 1485-1491.

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