DEPARTMENT OF THE ARMY
ALASKA DISTRICT, U.S. ARMY CORPS OF ENGINEERS
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CEPOA-PMC-E **July 10, 2025**

MEMORANDUM FOR National Marine Fisheries Service, Protected Resources Division

SUBJECT: Monthly Marine Mammal Monitoring Report for June 2025 Unalaska Channels Project, NMFS Consultation Number AKRO-2022-03610

1. General: This memorandum represents United States Army Corps of Engineer's (USACE's) Monthly Marine Mammal Monitoring Report to the National Marine Fisheries Service (NMFS) for the June 2025 Unalaska Channels Project (Project) in Unalaska, Alaska. J.E. McAmis (Contractor) is the contractor completing the dredging for the Project. Operations began June 24, 2025, and are ongoing. Project work is scheduled to be complete no later than September 27, 2025, pending no extensive weather and/or mechanical delays. This monthly report covers work and observations through June 30, 2025, accounting for a total of seven workdays.

2. Introduction: The general natural depth of Iliuliuk Bay in Unalaska, Alaska, is -100 feet Mean Lower Low Water (MLLW). However, there is a sediment bar, Iliuliuk Bar, at -42 feet MLLW that precludes continuous passage of deep draft vessels to and from Dutch Harbor. The purpose of the Project is to dredge the sediment bar to -58 feet MLLW. The Project is using a long reach excavator on top of the barge, *Ellis Island*, for the new work dredging of the Iliuliuk Bar involving 172,000 cubic yards of sediment. Maintenance dredging is anticipated to be performed at year 25 and comprise of approximately 16,000 cubic yards of sediment. The dredged material is then transferred to a dump scow, *Swan Island*. Once the dump scow is full, the tug boat, *Nola Gail*, moves the dump scow to the 110-foot deep in-water disposal site adjacent to the dredged prism and on the east side of the mouth of Iliuliuk Bay for dredged material discharge. Crew boat, *Crew Boat* 2, is used to transfer crew to and from the barge to land. An assist boat, *Loren M*, and survey boat, *Survey 1*, are utilized as needed during operations. The intent is to conduct dredging operations 24-hours a day. A 300-meter shutdown zone was stipulated for the dredging operations through the Biological Opinion (BiOp; AKRO-2022-03610). The Project Incidental Harassment Authorization (IHA) and the BiOp has also stipulated shutdown zones for blasting. However, blasting is not anticipated to occur at this point in time.

3. Observation Summary: The species observed during dredging operations included humpback whales, unidentified whales, northern sea otters, and Steller sea lions. The full set of observation data for June 2025 is available in the Marine Mammal Monitoring Datasheet (Enclosure 1). A summary of observations will be provided by species within this report.

a. Humpback whales: One night observation event of two adults were observed milling approximately 1,000 meters north of the dredge clamshell bucket, well beyond the shutdown zone for dredging operations.

b. Unknown whales: Two day events of two adults were observed traveling approximately 1,600 meters North and Northeast, respectively, of the dredge clamshell bucket. Well beyond the shutdown zone for dredging operations.

c. Northern sea otters: 81 events (67 day and 14 night) involving 82 individuals were observed presenting a variety of behaviors (e.g., floating and/or looking/diving). 80 of the events involved one adult. One event involved 1 juvenile and 1 adult. The northern sea otters ranged from 25 to 500 meters from the dredge clamshell bucket when PSOs were conducting observations. During dredging, the closest sighting was 40 meters from the clamshell bucket.

d. Steller sea lions: 47 events (29 day and 18 night) involving 98 adults were observed presenting a variety of behaviors (e.g., chuffing, looking, traveling). 12 events involved unauthorized take to 33 Steller sea lions as the individuals were first sighted within the BiOp 300-meter shutdown zone for dredging operations. Shutdown procedures were immediately implemented upon sightings of Steller sea lions within the 300-meter shutdown zone. In all cases of unauthorized take, no reaction to the dredging activities took place. During dredging, Steller sea lions ranged from 40 to 250 meters. Unauthorized take notification and reporting is described further in the Unauthorized Take Summary.

4. Unauthorized Take Summary: The Contractor has subcontracted Fairweather Science, LLC, (Fairweather) to provide Protected Species Observers (PSOs) for the Project's in-water activities. Upon review of the Marine Mammal Observation Datasheet from Fairweather, USACE identified numerous unauthorized takes of Steller sea lions (*Eumetopias jubatus*) and confirmed with Fairweather that no notification was provided to NMFS. USACE contacted NMFS directly for unauthorized takes that had occurred on the project since operations commenced on June 24, 2025. USACE further addressed and clarified reporting requirements for non-blasting unauthorized take with the Contractor and Fairweather and directed the Contractor and Fairweather to complete notifications within 24 hours of unauthorized take as directed in the Marine Mammal Monitoring and Mitigation Plan (4MP and BiOp). The sequence of notification to address unreported unauthorized take was as follows:

a. July 1, 2025: USACE identified numerous unauthorized takes had taken place upon review of the Marine Mammal Observation Datasheet and confirmed no notification had been provided to NMFS by the Contractor or Fairweather.

b. July 1, 2025: USACE notified NMFS via email of unauthorized takes of Steller sea lions.

c. July 1, 2025: Contractor and Fairweather was directed by USACE to provide the notification of unauthorized takes in accordance with the Project 4MP and BiOp as operations continued.

d. July 2-3, 2025: USACE followed up on notification through additional email and phone calls to ensure notification was received due to the Fourth of July holiday.

e. July 3, 2025: USACE received confirmation that the communications were received and NMFS directed USACE to continue Project operations but that consultation would need to be reinitiated due to the number of unauthorized Steller sea lion takes occurring during dredging operations. See Enclosure 2.

5. Work Completed Summary: The dredge rig and tug departed from Astoria, Oregon, via the Columbia River for the Project site in Dutch Harbor on June 3, 2025. The pre-dredge survey was completed by eTrac on June 3, 2025. Based on survey data, approximately 172,000 cubic yards of dredged material needs to be dredged to reach Project depths. 24-hour work days began on June 27, 2025. In June, 14,747 cubic yards were dredged (average of 2,950 cubic yards a day).

6. Shutdown and Delay Summary: Shutdown procedures and delays have occurred during dredging operations due to marine mammal occurrence near and within the 300-meter shutdown zone and insufficient lighting of the shutdown zone during night operations.

a. Marine Mammal Shutdowns: Marine mammal occurrence near or within the 300-meter shutdown zone have resulted in 9 hours and 35 minutes of shutdown and delays. Shutdowns and delays were associated solely with Steller sea lion occurrence. The longest delay of 4 hours and 29 minutes occurred on June 28, 2025, wherein Steller sea lions were observed predominately foraging.

b. Insufficient Lighting: The portions of the shutdown zone west of the dredging operations was sufficiently illuminated by lighting from the Project and nearshore infrastructure. The portions of the shutdown zone east of the dredging operations was not fully illuminated to allow operations to take place for the full 24-hour intended work day. Operations were shut down due to insufficient lighting of the shutdown zone for approximately 4 hours per workday, for a total of approximately 20 hours in June (approximately 4 hours per workday). The Contractor shipped additional floodlights and night vision devices (NVDs) to provide means of observing the full shutdown zone during nighttime operations moving forward and to prevent further shut downs due to insufficient lighting.

7. Contact Information: Please address any questions or concerns as it regards to this memorandum to Ms. Kayla Campbell, Biologist / NEPA Coordinator of the Environmental Resources Section, Civil Works Branch, Alaska District, USACE, at 907-753-2757, or at Kayla.n.campbell@usace.army.mil.

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2 Encls
1. Marine Mammal Monitoring Datasheet
2. NMFS Response

Kayla Campbell
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CEPOA-PMC-E **August 14, 2025**

MEMORANDUM FOR National Marine Fisheries Service, Protected Resources Division

SUBJECT: Monthly Marine Mammal Monitoring Report for July 2025 Unalaska Channels Project, NMFS Consultation Number AKRO-2022-03610

1. General: This memorandum represents United States Army Corps of Engineer's (USACE's) Monthly Marine Mammal Monitoring Report to the National Marine Fisheries Service (NMFS) for the July 2025 Unalaska Channels Project (Project) in Unalaska, Alaska. J.E. McAmis (Contractor) is the contractor completing the dredging for the Project. This monthly report covers work and observations from July 1, 2025, through July 31, 2025, and, as appropriate, June 2025 observational data due to a reduction in the shutdown zone radius that impacted the number of unauthorized takes that have taken place under the Project. Project work is expected to be completed mid to late August, pending no significant weather and/or mechanical delays.

2. Introduction: The general natural depth of Iliuliuk Bay in Unalaska, Alaska, is -100 feet Mean Lower Low Water (MLLW). However, there is a sediment bar, Iliuliuk Bar, at -42 feet MLLW that precludes continuous passage of deep draft vessels to and from Dutch Harbor. The purpose of the Project is to dredge the sediment bar to -58 feet MLLW. The Project is using a long reach excavator on top of the barge, *Ellis Island*, for the new work dredging of the Iliuliuk Bar involving 172,000 cubic yards of sediment. Maintenance dredging is anticipated to be performed at year 25 and comprise of approximately 16,000 cubic yards of sediment. The dredged material is then transferred to a dump scow, *Swan Island*. Once the dump scow is full, the tug boat, *Nola Gail*, moves the dump scow to the 110-foot deep in-water disposal site adjacent to the dredged prism and on the east side of the mouth of Iliuliuk Bay for dredged material discharge. Crew boat, *Crew Boat* 2, is used to transfer crew to and from the barge to land. An assist boat, *Loren M*, and survey boat, *Survey 1*, are utilized as needed during operations. The intent is to conduct dredging operations 24-hours a day. A 300-meter shutdown zone radius was stipulated for the dredging operations through the Biological Opinion (BiOp; AKRO-2022-03610). The Project Incidental Harassment Authorization (IHA) and the BiOp has also stipulated shutdown zones for blasting. However, blasting is not anticipated to occur at this point in time.

3. Reinitiation of Endangered Species Act Section 7 Consultation: USACE began notifying NMFS of unauthorized taking of Steller sea lions from Project dredging

operations on July 1, 2025, through July 2, 2025. Due to extent of Steller sea lion unauthorized take occurring due to Project dredging operations, NMFS responded reinitiated consultation was warranted under Endangered Species Act (ESA) Section 7 on July 2, 2025. July 9, 2025, USACE and NMFS met virtually to discuss reinitation of consultation under ESA Section 7. It was determined USACE would collect Project Sound Source Verification (SSV) data to inform the shutdown zone radius of 300-meter, and NVD use for nighttime work was discussed.

USACE collected SSV data on July 15, 2025, and determined the project-specific SSV data supported a reduced shutdown zone radius of 50-meters. USACE submitted an SSV analysis to NMFS on July 18, 2025. USACE and NMFS discussed the SSV analysis on July 22, 2025, and NMFS approved the implementation of the reduced 50-meter shutdown zone (concurrence and Meeting Minutes). It was acknowledged that it was likely that unauthorized take of Steller sea lions would continue even with the reduced shutdown zone radius. However, it was determined the unauthorized take within the 50-meter shutdown zone radius would be more representative of when Level B harassment exposure of underwater sound levels from dredging operations would be experienced by marine mammals. An important component of these discussions was the lack of observed response and/or change in behavior from the potentially exposed marine mammals within the reduced shutdown zone.

Correspondence between USACE and NMFS in July included discussion of night vision device (NVD) utilization for nighttime work. The Contractor requested the use of NVDs to monitor the shutdown zone during nighttime work due to physical lighting being insufficient to illuminate the full shutdown zone. USACE determined the use of NVDs was an appropriate means of monitoring the shutdown zone, since NVDs amplify natural and artificial light in the environment to illuminate the surroundings during periods of darkness. USACE follow-up with NMFS with regards to NVD use, and NMFS provided approval for NVD use on July 10, 2025.

USACE notified NMFS on August 1, 2025, about a July 29, 2025, observation of a Steller sea lion displaying potentially atypical behavior. USACE consulted with the PSO that made the observation and determined it was highly unlikely to be due to the Project, but provided notification to NMFS in case it was of concern. NMFS determined based on their review of the provided context (including video) that the behavior was likely foraging behavior and thus not of concern.

Important correspondence, including Meeting Minutes, is included in Enclosure 1. USACE will continue to coordinate with NMFS to complete reinitiated consultation for this Project. The Project is anticipated to be completed prior to the completion of reinitiated consultation, but USACE has and will maintain frequent, transparent communication with NMFS to ensure unauthorized and potential take of marine mammals is avoided and minimized to the extent practical.

4. Observation Summary: The species observed during dredging operations included humpback whales, unidentified whales, northern sea otters, harbor seals, and Steller

sea lions. The full set of observation data for the Project through July 31, 2025, is available in the Marine Mammal Monitoring Datasheet (Enclosure 2). The June 2025 data was updated to ensure inputs were consistent with the reduced shutdown zone radius of 50 meters. Due to the reduction in the shutdown zone, this report will summarize data since the start of the Project wherein appropriate. Data will be summarized and reviewed by species.

a. Humpback whales: A total of 92 (76 adults and 16 juveniles) humpback whales have been observed during Project activities. This count included the 2 adults observed in June 2025; i.e., 90 humpback were observed in July. No humpback whales have occurred within the 50-meter shutdown zone radius during active dredging operations. The closest a humpback whale has come within the excavator bucket is 90 meters. No unauthorized take or reaction to Project activities has been observed.

b. Unknown whales: A total of 10 adult unidentified whales have been observed during Project activities. This count included the 4 adults observed in June 2025; i.e., 6 adult humpbacks were observed in July. No unidentified whales have occurred within the 50-meter shutdown zone radius during active dredging operations. The closest an unidentified whale has come within the excavator bucket is 1,500 meters. No unauthorized take or reaction to Project activities has been observed.

c. Northern sea otters: A total of 461 (459 adults and 2 juveniles) northern sea otters have been observed during Project activities. This count included the 81 adults and 1 juvenile observed in June 2025; i.e., 378 adult and 1 juvenile northern sea otter were observed in July. The closest a northern sea otter has come within the excavator bucket is 10 meters. No reaction to Project activities has been observed. Shutdowns are implemented as necessary to avoid direct contact between a northern sea otter and Project equipment. No unauthorized take or reaction to Project activities has been observed.

d. Harbor seals: A total of 6 adult harbor seals have been observed during Project activities. All harbor seals were observed in July. Harbor seals have come within 50 meters of the excavator bucket but not during active dredging operations. No unauthorized take or reaction to Project activities has been observed.

e. Steller sea lions: A total of 1,109 (1,108 adults and 1 juveniles) Steller sea lions have been observed during Project activities. Unauthorized take has occurred for 18 adult Steller sea lions (five in June and 13 in July) over four observation events with the application of the 50-meter shutdown zone radius for dredging operations. Unauthorized takes have predominately taken place during the night shift (17 of the 18 unauthorized takes have taken place during night shift). The closest a Steller sea lion has come within the excavator bucket is 10 meters. The closest a Steller sea lion has come within the excavator bucket during active dredging operations is 30 meters. No reaction to Project activities has been observed.

5. Unauthorized Take Summary: The Contractor has subcontracted Fairweather Science, LLC, (Fairweather) to provide Protected Species Observers (PSOs) for the Project's in-water activities. Upon review of the Marine Mammal Observation Datasheet from Fairweather, USACE identified a total unauthorized take count of 18 adult Steller sea lions across four events. The PSO has been actively notifying NMFS within 24 hours when unauthorized take has occurred. This notification occurred in accordance with the active shutdown zone radius. These notifications are not provided with this MMMR. Unauthorized take predominately is a result of the ability of Steller sea lions to suddenly appear within the shutdown zone during active dredging. However, unauthorized take on June 30, 2025, occurred due to Steller sea lion activity within a blind spot during monitoring.

6. Work Completed Summary: The dredge rig and tug departed from Astoria, Oregon, via the Columbia River for the Project site in Dutch Harbor on June 3, 2025. The pre-dredge survey was completed by eTrac on June 3, 2025. Based on survey data, approximately 172,000 cubic yards of dredged material needs to be dredged to reach Project depths. 24-hour work days began on June 27, 2025. In June, 14,747 cubic yards were dredged (average of 2,950 cubic yards a day).

On July 29, 2025, the gross amount of material dredged was 133,384 cubic yards. This amount does not account for 2 days worked in July 2025, and thus is biased low. The average quantity dredged since the start of the Project is approximately 3,705 cubic yards of material per day. This does not account for work time lost due to shutdowns and partial work days that occurred between June 24 through June 26, 2025. Of the 543 hours and 27 minutes of Project work complete by July 31, 2025, 479 hours and 13 minutes was worked in July.

Work is anticipated to be completed on or about mid to late August 2025. Upon completion of dredging, a survey will be conducted to confirm no additional dredging is required to reach Federally-authorized depths.

7. Shutdown and Delay Summary: Shutdowns and delays occurred during dredging operations due to marine mammal occurrence near and within the 300-meter until July 22, 2025, when the reduced shutdown zone radius of 50 meters was implemented. There were also shutdowns, delays, and periods of no construction associated with equipment maintenance, weather and lighting conditions, and other circumstances. This section is focused on delays and shutdowns that occurred in July.

a. Marine Mammal: Marine mammal occurrence near or within the applicable shutdown zone have resulted in 48 hours and 39 minutes of shutdown and delays according to the observations logs. Shutdowns and delays prior to the implementation of the reduce marine mammal shutdown radius on July 22, 2025, accounted for a total of 47 hours and 15 minutes of delay and shutdown. Shutdowns and delays were due to the occurrence of Steller sea lions, humpback whales, and northern sea otters. Variations in the total duration of marine mammal shut downs and delays is attributed to (1) differences in methods of inputting data into the construction activity log versus the

observation log and (2) inputs being recorded by separate individuals. The total duration for marine mammal delays and shutdowns for July based on the construction activity log (i.e., 49 hours and 31 minutes) is higher than the total inputs recorded on the marine mammal observation log.

b. Insufficient Lighting: Portions of the shutdown zone west of the dredging operations does not have sufficient natural lighting and requires the use of floodlights and/or NVDs to monitoring the zone during the darkest period of nighttime work. Prior to the authorization to use NVDs, the Contractor could not conduct nighttime work due to lack of artificial lighting. The allowance to use NVDs enabled the Contractor to conduct work 24/7 except wherein weather conditions were not conducive to NVD use (e.g., rain or fog).

c. Weather: Weather delays accounted for in July equaled to 31 hours and 41 minutes. Fog and rain were the predominate weather conditions that caused a delay or shutdown due to reduced visibility of the full shutdown zone. Working personnel were also required to shut down operations and move back to shore and higher ground during a tsunami warning on July 16, 2025. The operator called a delay to dredging operations due to a large swell. This was captured as a weather delay.

d. Equipment or Maintenance: There were shutdowns and delays predominately associated with the excavator and excavator computer maintenance and repairs. These were typically covered under “No Construction– on watch” entries, which accounted for 99 hours and 3 minutes of downtime.

8. Contact Information: Please address any questions or concerns as it regards to this memorandum to Ms. Kayla Campbell, Biologist / NEPA Coordinator of the Environmental Resources Section, Civil Works Branch, Alaska District, USACE, at 907-753-2757, or at Kayla.n.campbell@usace.army.mil.

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2 Encls
1. Correspondence
2. Marine Mammal Monitoring Data Sheet

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United States Army Corps of Engineers