



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

September 6, 2002

Jane Gendron
CH2MHill
P.O. Box 20109
Juneau, Alaska 99802

Re: Hoonah Airport Master Plan

Dear Ms. Gendron:

This is a follow up to the e-mail regarding the Hoonah Airport Master Plan update which was sent to you on August 29, 2002 (attached).

After reviewing the documents provided and comments from other resource management agencies the National Marine Fisheries Service (NMFS) believes this project may have adverse effects to Essential Fish Habitat (EFH). The Hoonah Airport is located in an estuarine setting which provides valuable spawning and rearing habitat for multiple species of anadromous and marine fish.

EFH consists of those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity. For the purpose of interpreting the definition of essential fish habitat: "Waters" include aquatic areas and their associated physical, chemical, and biological properties that are used by fish and may include aquatic areas historically used by fish where appropriate; "substrate" includes sediment, hard bottom, structures underlying the waters, and associated biological communities; "necessary" means the habitat required to support a sustainable fishery and the managed species' contribution to a healthy ecosystem; and "spawning, breeding, feeding, or growth to maturity" covers a species' full life cycle (50 CFR 600.10)

Runway Extension Alternatives:

Both alternatives for runway expansion and taxiway construction would negatively affect fish habitat in Gartina, Coho and Shotter Creeks. Extension of the runway to the east would have negative impacts to essential fish habitat due to



habitat destruction from removal of obstructions to air traffic. Coho Creek would be seriously affected if the full parallel taxiway alternative was constructed. Extending Runway 5 to the west would impair intertidal portions of Gartina Creek and affect both spawning and migration of the creek's salmon populations. We encourage the FAA to examine the need for runway expansion and recommend that any extension of the runway be constructed in a staged fashion. On-site, in-kind mitigation options for associated wetland fills should be developed.

Apron and Lease Lot Expansion

Alternative One would require re-routing Coho Creek substantially, require an additional road crossing, and involve considerable wetland fill, all of which would negatively affect fish habitat and water quality within the creek. Alternative Two would negatively affect Shotter Creek through development of public parking, an access road and additional lease lots. We encourage the FAA to take a hard look at the need for these facilities and investigate other offsite alternatives to fill the airport's need for these facilities.

Security Fencing

While we understand the security need for perimeter fencing, we question the feasibility and practicability of fencing the airport's intertidal perimeter area. Construction and maintenance of the berm necessary to support such a perimeter fence would be both logistically difficult and have serious negative effects to both anadromous and marine fish utilizing this habitat for spawning and rearing. We encourage the Federal Aviation Administration (FAA) to consider other security techniques which are better adapted to this habitat and are less environmentally damaging.

Pursuant to section 305(b)(2) of the Magnuson-Stevens Fishery Conservation and Management Act, Federal agencies must consult with NMFS regarding any of their actions authorized, funded, or undertaken that may adversely affect EFH.

An Essential Fish Habitat assessment should be conducted by the federal action agency, the FAA (or its designee by giving written notice of such designation to NMFS) and a written assessment of the effects of the proposed action on EFH must be provided to NMFS. Mandatory contents of an EFH assessment are:

1. A description of the proposed action
2. An analysis of the effects of that action on EFH and federally managed species
3. The action agency's views on those effects
4. Proposed mitigation, if applicable

Additional information should be included if appropriate, such as:

5. Results of on-site inspections
6. Views of recognized experts on affected habitat or fish species
7. Review of pertinent literature and
8. Alternatives analysis

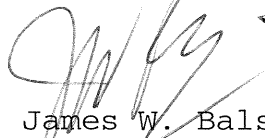
After reviewing the EFH assessment NMFS will provide EFH conservation recommendations regarding measures that can be taken to avoid, minimize or mitigate for adverse effects to EFH.

More information on EFH designation and consultation can be found on our web site at <http://www.nmfs.noaa.gov/habitat/habitatprotection/essentialfishhabitat8.htm>.

General information on the distribution and life stages of federally managed fish species in the project area can be found on our web site at <http://www.fakr.noaa.gov/maps/default.htm>. In addition to pink, chum and coho salmon, the marine and estuarine waters in the vicinity of the Hoonah airport are likely to support the following federally managed species: Dover sole; dusky rockfish; Pacific cod; Pacific ocean perch; shortraker and roughey rockfish; sablefish; various species of sculpins and skates; walleye pollock in all life stages; and yelloweye rockfish.

NMFS looks forward to receiving and reviewing the FAA's EFH assessment and providing EFH conservation recommendations. Please contact Sue Walker, Marine Resource Specialist, Habitat Conservation Division at (907) 586-7636 or susan.walker@noaa.gov with questions or comments regarding this project.

Sincerely,



James W. Balsiger
Administrator, Alaska Region

cc: USFWS, Enriquez
FAA, Jim Lomen
City of Hoonah, Mayor Dick Albert
ADGC, Katharine Heumann
ACOE, John Leeds
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ADEC, Jim Powell
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