



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

*National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668*

April 30, 2003

R. F. Krochalis
Regional Administrator
Federal Transit Administration
915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002

Re: Knik Arm Ferry Project
EFH Assessment

Attention: Jennifer Bowman

Dear Mr. Krochalis:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced essential fish habitat (EFH) assessment prepared by the Federal Transit Administration (FTA). The proposed project involves development of a commuter ferry system between Port MacKenzie and Anchorage. As currently planned, one ferry landing would be constructed off the south side of the existing dock at Port MacKenzie on the Mat-Su side of Knik Arm. In Anchorage, ferry landings are proposed at one of three locations: North Star Alternative, Ship Creek Point Alternative, and Second Avenue Extension Alternative.

The FTA has made a determination that the project may adversely affect EFH. NMFS agrees with this determination. The Magnuson-Stevens Fishery Conservation and Management Act requires NMFS to make conservation recommendations regarding any federal action that would adversely affect EFH. The construction and operation of the proposed project would adversely affect EFH and anadromous fish if necessary conservation measures are not followed.

Knik Arm provides EFH for migrating and/or rearing chinook salmon (*Onchorynchus tshawytscha*), coho salmon (*Onchorynchus kisutch*), pink salmon (*Onchorynchus gorbuscha*) and chum salmon (*Onchorynchus keta*). Ship Creek, located within the Anchorage portion of the project area, is listed as anadromous (ADF&G anadromous catalog, Anchorage A-8). In addition, EFH for several species of groundfish occurs in Knik Arm, and of these, sculpins (Cottidae), Pacific cod (*Gadus macrocephalus*), and walleye pollock (*Theragra chalcogramma*) would be the most likely to utilize the nearshore area of the project.



We offer the following recommendations pursuant to section 305(b)(4)(A) of the Magnuson-Stevens Fishery Conservation and Management Act.

EFH Conservation Recommendations

1. FTA should select the North Star Alternative as the preferred option.

Rationale - The placement of fill for the Second Avenue Extension Alternative (9.2 acres) and the Ship Creek Point Alternative (3.5 acres) would result in a permanent loss of EFH in Knik Arm. The North Star Alternative requires no fill and no permanent loss of EFH.

2. In addition to the Best Management Practices listed in the EFH assessment, the applicant should use an oil/water separator or equivalent system that removes total suspended solids (TSS) and oil and grease from the ferry parking lot drainage, associated buildings, and roads. The applicant should also implement a maintenance and monitoring plan for this system.

Rationale - Non-point source pollution can have deleterious effects on salmonids, particularly growth in juveniles. Petroleum hydrocarbons damage developing salmon eggs, larvae, and fry at extremely low concentrations. Sculpin eggs and larvae, and juvenile Pacific cod, which may occur in nearshore areas, would likely experience similar effects.

3. The applicant should submit an annual report containing results of monthly monitoring for TSS and oil and grease to the FTA and NMFS.

Rationale - A report will demonstrate compliance with conservation recommendation # 2. Also, monitoring the performance of the oil/water separator will determine if this treatment system is adequate to protect EFH.

4. Pile driving and other in-water work should be avoided from March 1 through June 30 to avoid disturbance of outmigrating salmon fry and smolt.

Rationale - Pile driving can generate intense sound pressure waves that may injure and kill fish. Dredging and fill activities can contribute sediment to the marine environment, potentially decreasing fish feeding efficiency and smothering benthic organisms.

5. Conduct in-water and intertidal work at low tide to the extent possible.

Rationale - Sound from pile driving is more rapidly attenuated in shallow water than deep water due to reflection at the water surface and absorption by bottom sediments. Conducting other work at low tide will decrease the amount of sediment introduced to the water column.

The following recommendations are pertinent should one of the two fill alternatives (Ship Creek Point Alternative or Second Avenue Extension Alternative) be constructed:

6. FTA should require the applicant to provide compensatory mitigation for the permanent loss of EFH in Knik Arm of 9.2 acres (*Second Avenue Extension Alternative*) or 3.5 acres (*Ship Creek Point Alternative*).

Rationale - A reasonable and prudent alternative exists (North Star Alternative) that requires no fill or permanent loss of EFH.

7. During dredging activities, a silt curtain should be installed and maintained. The curtain should completely enclose the dredge area and remain in place until construction is completed and the side slopes have been stabilized.

Rationale: Dredging and fill activities can contribute sediment to the marine environment, potentially decreasing fish feeding efficiency and smothering benthic organisms. Use of a silt curtain will decrease the size of the affected area.

8. All dredge material must be free of contaminants prior to disposal within the proposed fill area.

Rationale: Dredging and fill activities have the potential to suspend contaminants, if these are trapped in sand and gravel, into the water column where marine resources could be exposed.

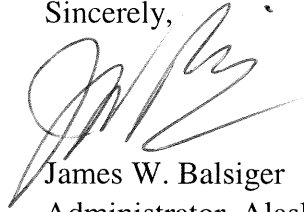
9. Fill below the high tide line should be clean shot rock. Fill should be placed when the site is de-watered by lower tide stages. During construction, the fill site should be graded each work shift to prevent ponding on the fill surface that could trap fishes between high tides.

Rationale: The aforementioned guidelines will minimize disturbance from placement of fill. Fill activities can contribute sediment to the marine environment, potentially decreasing fish feeding efficiency.

We hope that this information is useful to FTA in fulfilling the coordination and consultation requirements of the Magnuson-Stevens Act and 50 CFR 600.920.

Brian Lance is the NMFS contact for this project, and can be reached by telephone at (907) 271-1301.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Balsiger', written in a cursive style.

James W. Balsiger
Administrator, Alaska Region

cc: COE, USFWS, EPA, ADGC, ADFG, ADEC - Anchorage