



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

July 15, 2003

Dave Schmid
District Ranger
U.S. Forest Service
Thorne Bay Ranger District
P.O. Box 19001
Thorne Bay, AK 99919

RE: Draft Environmental Assessment: Coffman Cove: Dog
Creek Bridge to Ferry Terminal and Draft Biological Evaluation
Coffman Cove Ferry Terminal

Dear Mr. Schmid:

The National Marine Fisheries Service (NMFS) has reviewed the Draft Environmental Assessment (EA) for Coffman Cove - Dog Creek Bridge to Ferry Terminal. This project would upgrade the Forest Service 3030295 Road on Prince of Wales Island between Dog Creek Bridge and add a new road segment to the proposed ferry terminal. The project also includes construction of a shared use trail adjacent to the road. NMFS has also reviewed the Draft Biological Evaluation (BE) for the Coffman Cove Ferry Terminal. We are providing the following comments and recommendations on these documents.

The Draft EA evaluates only a single alternative for the proposed ferry terminal. The draft states that a second alternative at an existing Forest Service log transfer facility was not analyzed because it did not meet the design criteria, goals, purpose and need. As currently written, the EA does not provide sufficient information for NMFS to evaluate the potential impacts of the alternative compared with other reasonable alternatives, if available. If no other reasonable alternatives are available, the draft should explain why.

The BE contains an assessment of the potential impacts of the ferry terminal on Essential Fish Habitat (EFH). Appendix A, Essential Fish Habitat, states that no surveys were conducted to ascertain substrate and vegetation at the proposed terminal location. This section references a personal communication with Elaine Price, Project Coordinator for the City of Coffman Cove, indicating that no eelgrass occurs at the proposed ferry terminal site. What this information is based on (e.g. previous surveys of the site) is not clear. Without more substantive information, NMFS is not able to concur that implementation of conservation measures may avoid, minimize or otherwise offset potential adverse effects to EFH.



The filling of the intertidal area to create the terminal facility and parking area will directly affect EFH by removing habitat, and could have indirect effects as a result of runoff from the parking area and impeding fish migration. The BE does not evaluate potential biological impacts from the terminal facility and parking area. These activities are briefly covered in the EA which states that the removal of habitat through filling would have a negligible impact on available habitat and total productivity within the intertidal zone. NMFS agrees that the proposed fill will affect EFH but is unlikely to have a significant negative impact on available habitat and productivity.

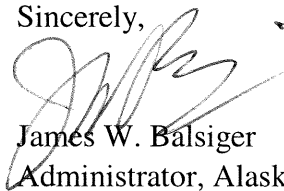
For indirect impacts to water quality, the EA states that these impacts will be minimized through implementation of best management practices (BMPs), including capturing and treating runoff water. The EA does not specify the BMPs that will be implemented nor does it discuss how runoff water will be captured and treated before reaching Coffman Cove. Design elements and facilities for capturing and treating runoff water are not included in the proposed ferry terminal site plan (Figure 5). NMFS agrees that methods for controlling water quality impacts from the terminal and parking area are necessary and should be included in the design of these facilities. To ensure that these measures adequately protect EFH, we would need to review the specific designs for runoff collection and treatment.

Finally, the BE concludes that construction and operation of the ferry terminal may affect but is unlikely to adversely affect humpback whales and Steller sea lions. NMFS concurs with this finding.

In conclusion, the EA should (1) be revised to include reasonable alternatives to the single proposed ferry terminal site, if available, (2) include surveys of the potential terminal locations to ascertain substrate and vegetation for the purposes of assessing impacts on EFH, and (3) provide more detailed information on the specific actions that will be taken to protect water quality from runoff associated with the terminal and parking facility.

Please contact Katharine Miller (907) 586-7643 if you have any questions regarding this letter.

Sincerely,



James W. Balsiger
Administrator, Alaska Region

cc: EPA Juneau, Chris Meade
USACOE, Colonel Griffith
ADEC, ADF&G, ADNR, USFWS, Juneau