



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

March 14, 2003

Mr. Reuben Yost
Regional Environmental Coordinator
Alaska Department of Transportation
and Public Facilities
6860 Glacier Highway
Juneau, Alaska 99801-7999

RE: Draft Essential Fish Habitat (EFH) Assessment,
Gravina Access Project, #67698/ACHP-0922(5)

Dear Mr. Yost:

The National Marine Fisheries Service (NMFS) has reviewed the referenced Draft EFH assessment. NMFS offers both general and specific revisions for your consideration.

General Comments:

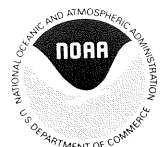
Page 1, Section 1.0, B., second paragraph, last sentence, and Page 13, Section D.:

This sentence states that "Alternatives F1 and F3 would require placing culverts in an unnamed anadromous fish stream that would cause loss of EFH." Section D. reiterates this point. The EFH assessment and DEIS should include, as an alternative for analysis, the use of bridges for these alternatives. Bridges usually eliminate or significantly minimize adverse effects to EFH.

Page 10, Section 4.0, A., first paragraph, fourth and fifth sentences:

These sentences state that "There would be some permanent loss of eelgrass beds from placement of fill in Tongass Narrows. Pier footings and the bridge structures could slow the growth of eelgrass beds by shading, which indirectly would negatively impact EFH."

The EFH assessment should document how much eelgrass would be impacted and where it is located. Figure 1 should map the location of the eelgrass beds, as well as other sensitive habitats, including kelp beds and wetlands. A sentence should



be added to this section that mentions the loss of interspersed eelgrass and kelp in the next section "Impacts of Pier Construction and Modification." Acreage of impacts by habitat type of eelgrass, kelp and wetlands should be included in Table 1-1, which currently provides only "freshwater" and "marine" impacts.

Page 11, Section 4.0, A., third paragraph:

This paragraph outlines plans for channel widening that would deepen a 2,000 foot long by 550-750 foot wide area from -10 to -40 mean lower low water (MLLW). According to this section "This action would eliminate interspersed eelgrass and kelp beds located in this area. Newly exposed soil and rock surfaces would be re-colonized over a period of years. Ultimate benthic assemblages are expected to resemble those now found in similar substrates and depths. Because of the loss of some shallow water habitats, especially on the southwest side of the channel, overall productivity in the area would be less than current productivity in the existing shallower areas."

This discussion should indicate how much eelgrass and kelp would be eliminated, and where it is located (preferably on a map). It is unlikely that these communities would re-establish in the deeper depths that would result. Eelgrass is typically found to -20 feet MLLW in southeast Alaska, and kelp to -60 feet MLLW. This should be clearly stated, and the document should provide a more specific description of the benthic communities referred to as replacing those eelgrass and kelp communities. NMFS may be able to assist with a dive survey to document the benthic habitat in this area. United States Fish and Wildlife Service staff have also expressed interest in a possible dive survey for this project (Mr. Ed Grossman, personal communication, March 11, 2003).

Page 14, fifth bullet:

The blasting plan will need to be reviewed by NMFS for both EFH and marine mammal impacts.

Page 15, fourth bullet:

Placement of riprap along stream banks to maintain stream bank integrity should include the use of bioengineering techniques to improve habitat value of the riprap, by incorporation of willow stakes, or other locally available vegetation.

Specific Comments:

Page 3, section 3.0, penultimate sentence:

Add boldface type to sentence as follows.

"These include Government Creek, Airport Creek **and its tributary**, and two unnamed streams (Figure 1)."

Page 4, section 3.0, A., third sentence:

Replace "dusty rockfish" with "dusky rockfish".

Page 4, section 3.0, A., fourth sentence:

Replace "shore tracker" with "shortraker rockfish".

Page 4, section 3.0, A., eight sentence:

Replace "species; they", with " species, which".

Page 5, section 3.0, C., fifth sentence:

Remove the word "and" from "lower (>1000 meters) and slopes and basen (>3000 meters) (NMFS 1999)."

Page 5, section 3.0, C., "Arrowtooth Flounder" paragraph, fourth sentence:

Remove "s" from word "desmersal" to spell as "demersal".

Page 5, section 3.0, C. "Dusty (sic) Rockfish" paragraph, title and first sentence:

Replace "Dusty rockfish" with "Dusky Rockfish".

Page 6, section 3.0, C. "Pacific Cod":

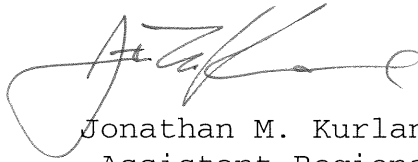
Add the sentence "Juvenile Pacific cod have been captured in nearshore eelgrass and kelp beds."

Page 6, section 3.0, C. "Shore tracker (sic) and Rougheyeye Rockfish":

Replace "Shore tracker" with "Shortraker"

Thank you for the opportunity to review the draft EFH assessment. Please direct any questions you may have regarding these comments to Linda Shaw at (907) 586-7510.

Sincerely,



Jonathan M. Kurland
Assistant Regional Administrator
for Habitat Conservation

cc: EPA, Juneau
ADEC, AADGC, ADNR, ADF&G, USFWS, Juneau
ADF&G, Ketchikan