



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

February 12, 2004

Mr. Rubin Yost
Project Manager
Alaska Department of Transportation and Public Facilities
6860 Glacier Highway
Juneau, Alaska 99801-7999

Re: Juneau Access Improvements, Project No. 71100
Draft Wetlands Technical Report
Draft Essential Fish Habitat Assessment

Dear Mr. Yost:

The National Marine Fisheries Service (NMFS) has reviewed the draft Wetlands Technical Report and draft Essential Fish Habitat Assessment for the Juneau Access project and provides the following comments.

Wetlands Technical Report

This report assesses the potential impacts to wetlands from road construction, use and maintenance for the proposed alternative road alignments and ferry routes along East and West Lynn Canal that would connect Juneau with Haines and/or Skagway. The report is based on information from the Wetlands Technical Report prepared for the 1997 Draft Environmental Impact Statement, updated to incorporate the site specific wetland information gathered during the 2003 field season. This recent field work resulted in proposed road realignments for the East Lynn Canal route at several locations to avoid disturbance of some wetland units and significantly reduced the acreage of forested, estuarine, and estuarine emergent wetlands that would be lost due to construction of the roadbed.

The report contains a thorough and useful analysis of wetland values and functions for each individual wetland and marine area likely to be directly impacted by each alternative. The report's greatest weakness is a paucity of analysis concerning the indirect and cumulative effects of the proposed project on wetlands and marine areas. Another shortcoming is the repeated reference to other documents (e.g., Wildlife Technical Report, Steller Sea Lion Technical Report) which are not yet available for reference, resulting in data gaps for the reviewers.

The document contains a good description of the physical and chemical factors that combine to form valuable fish habitats, but overstates the importance of wetlands supporting anadromous Pacific salmonids compared to wetlands that support marine fish species. Page 2-8 states "The most valued Alaskan wetlands for fish habitat are those that serve as habitat for anadromous Pacific salmon, with documented use in both winter and summer." This statement ignores the value of the nearshore intertidal areas, especially emergent estuarine wetlands, as spawning and nursery areas for many marine fish species, and the critical importance of submerged aquatic



vegetation (seagrasses and kelps) as habitat for many life stages of commercially and ecologically important marine species and forage species such as Pacific herring, eulachon, sand lance and capelin that are important prey for fish, marine mammals, and birds. Wetlands which do not provide spawning, feeding or overwintering habitat nonetheless provide valuable interconnected wetland functions such as groundwater recharge, discharge and lateral flow, riparian support, and nutrient transformation and export.

The document states “most anadromous fish streams in Alaska have been documented by ADF&G and/or are identified as EFH by NOAA Fisheries.” The ADF&G stream catalog is continually updated and documents approximately 50% of the existing anadromous fish streams. NOAA Fisheries, like many resource agencies, relies on the ADF&G Anadromous Stream catalog as a tool for conducting or reviewing EFH assessments, however EFH is not limited to identified or cataloged anadromous fish streams. For Pacific salmon species, EFH extends from the EEZ to the headwaters of each spawning stream.

We suggest re-wording the Wetlands Technical Report so that it simply and objectively quantifies the extent of affected wetlands by type and function for each alternative, rather than subjectively ranking the importance of each wetland and its functions. The inventory of wetlands and analysis of wetland functions and values contained in the extensive tables and figures of the document appear complete and adequate for the objective quantification suggested above.

We suggest that one function, “downstream/coastal beneficial sites,” be modified to reflect the nearly pristine, uninhabited setting of this proposed project. Rather than rank nearly every wetland as low due to isolation from human structures and residences and/or isolation from surface water outlets, we suggest the function be evaluated on the wetland unit’s only applicable function, its “ability to reduce sediment/toxic contamination in surface water used directly by.....aquatic life.”

Essential Fish Habitat Assessment

Like the Wetlands Technical Report, the draft EFH Assessment is also well-written and comprehensive. The investigations of nearshore, intertidal and subtidal habitat areas potentially affected by each project alternative are mostly thorough and comprise a wealth of site-specific information on Lynn Canal’s marine resources that will be useful for this and other projects.

The introductory sections, such as the definition of EFH and Regulatory Requirements and overview of the EFH consultation process, are accurate and informative to reviewers. A few points need clarification:

- Text on page 1-2 states that, “Based on preliminary consultation with NOAA Fisheries, DOT&PF has determined that the alternative may adversely affect the following fish species....” Yet on page 7-1, the document states that the agency determination [on

whether the proposed project will adversely affect EFH] would be supplied as part of the final EFH assessment. DOT&PF, acting for the FHWA, has already made the determination that the proposed project may adversely affect EFH.

- The list of managed species includes a forage fish category consisting of eulachon, capelin and sandlance eggs, juveniles and adults. While this is correct, because these are species included in the Gulf of Alaska Groundfish Fishery Management Plan, this can be confusing to reviewers because Pacific herring are a very important forage fish species, but are not listed under the forage fish category. The document would be strengthened by explaining why Pacific herring are not an FMP species but are included in the EFH analysis. We offer assistance with the wording on this confusing topic. The Alaska Department of Natural Resources, Office of Habitat Management and Planning has provided a comprehensive description of the natural history and current status of the Lynn Canal Pacific herring stock with emphasis on the Berner's Bay spawning history. We recommend incorporating this summary into the document.
- The description of EFH for Pacific salmon species should be corrected to reflect that "EFH for Pacific salmon, which includes all estuarine and marine areas used by all five species of Pacific salmon [regardless of the geography of their natal origin] extends from the headwaters of natal streams to the limits of the EEZ (200 miles offshore)."
- Table 3-7 refers to "verucaria" being observed in several intertidal survey evaluations. Please replace this with either the correct spelling of this genus, "Verrucaria" or a more commonly understood common name such as black lichen.
- At least two subtidal surveys (Sawmill Cove and William Henry Bay) identified groves of soft corals, sea pens and/or sea whips. These Pennatulacean corals are living marine substrates and constitute EFH for several species of federally managed fish. They are also considered a Habitat Area of Particular Concern (HAPC) because of their ecological importance, sensitivity to disturbance, and rarity. While several other sea pen groves exist in the Juneau area, they are rare. Four federally managed species have been observed in surveys of similar soft coral groves: juvenile red king crab (*Paralithodes camtschaticus*), juvenile walleye pollock (*Theragra chalcogramma*) and juvenile flatfishes (southern rock sole, *Lepidopsetta bilineata* and yellowfin sole, *Limanda aspera*). Sea pens and sea whips provide important rearing habitat for these species.
- The purpose of conducting an EFH Assessment is to provide information needed to develop conservation recommendations that will result in avoidance or minimization of the adverse effects on EFH, rather than to categorize the relative value of each parcel of EFH. Moreover, the single point in time surveys employed in this study are not a sufficient basis for determining relative habitat value. Attempts to value EFH appear throughout the document, and are summarized in section 5-1 and Table 5-1, yet the application of this rating system appears to be flawed. An example is the assessment of

the impact of considerable dredging and filling for ferry terminal construction near the Katzehin River. The EFH assessment characterizes the effects of construction of the ferry dock as “negligible to minor” because they are short term, and the effects of the ferry terminal basin and building/parking area as minor because subtidal vegetation is sparse and the site is less valuable as EFH compared to more protected and productive areas. We do not agree with these characterizations and such valuations are of little use in the planning process. Instead we recommend that you simply quantify the type and amount of each habitat type likely to be adversely impacted, and assess the effects of these impacts on the managed species.

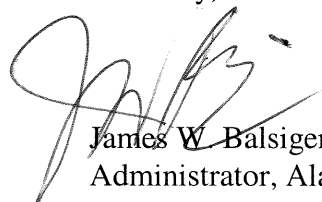
- Do not capitalize the common name of *Onchorhynchus tshawytscha*, chinook.
- More information is available on the occurrence of rockfish in Lynn Canal than is presented in the document. We will assist in providing more information on these species.
- Section 4.3.7 should be expanded to include Pacific herring due to the importance of this species for the Lynn Canal ecosystem. Even though herring is not a federally managed species, including an analysis of the project’s effects on herring in this section would be prudent. An adverse effect on Pacific herring would likely be construed as an adverse effect on EFH because herring are important prey for managed species and a diminished herring stock could reduce the quality of foraging habitat for other species.
- Page 5-2 refers to an EFH Assessment completed for ferry terminal modifications at the Auke Bay Ferry Terminal. NMFS determined that due to the nature of that project and with the incorporation of project and site-specific conservation recommendations, adverse effects to EFH were minimized. Conservation recommendations developed for that project may not be transferrable to the proposed Haines or Skagway Ferry Terminal modification.
- Page 5-2 refers to the effects of ferry terminal operations on EFH and describes the current practice of ferry waste treatment and effluent discharge. Given the brief description of waste management, NMFS cautions that the current practices, if conducted in sheltered areas, could result in significant impairment of EFH from eutrophication and chronic chlorine contamination.
- Page 5-3 describes the proposed ferry terminal at Katzehin River. The site survey for Katzehin River was conducted when visibility was less than one foot. We recommend this site be re-surveyed during the winter low-flow period when visibility will likely be greater.
- Sewage treatment for ferry terminals would likely consist of on-site secondary treatment using aeration septic treatment units with marine outfalls. NMFS recommends dive

surveys of proposed outfalls and mixing zones to avoid sensitive marine habitats.

- Alternative 2A would involve construction of a ferry terminal at Sawmill Cove and Slate Cove, and north of Katzehin River. Alternatives 4B and 4D would involve construction of a ferry terminal at Sawmill Cove. ADOT suggests that ferry terminal construction would have negligible effects on EFH. NMFS disagrees, as ferry terminal construction at Sawmill Cove would involve the filling of intertidal and subtidal habitat, dredging a boat basin, pile driving, and continual ferry operations with attendant propeller wash, hydrocarbon input and waste disposal issues. The effects of these (and all) proposed project components should be quantified in terms of habitat type, location, and effects on EFH.
- Proposed Conservation Measures, Page 6-1 mentions only limited in-water construction windows and construction BMPs to protect water quality. This is not a comprehensive discussion of available conservation measures and should be expanded to include siting considerations that would avoid or minimize impacts, consideration of construction alternatives (e.g., pilings versus fill), and operational modifications that would avoid or minimize impacts to EFH.
- This document, along with the Wetlands Technical Document, lacks any mention, discussion or proposal for mitigation of adverse effects to EFH or wetland losses. NMFS looks forward to working with ADOT to develop useful and feasible mitigation measures.

Please contact Susan Walker (907-586-7646, susan.walker@noaa.gov) with any questions regarding this review.

Sincerely,



James W. Balsiger
Administrator, Alaska Region

cc: Tim Haugh - FHWA, Juneau
Moir Ingle - ADNR-OHMP
Carl Schrader - ADNR-OHMP
Bruce Halstead - FWS, Juneau
Chris Meade - EPA, Juneau