



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

August 15, 2005

Colonel Timothy J. Gallagher
District Engineer
U. S. Army Corps of Engineers
P.O. Box 898
Anchorage, AK 99506-0898

RE: POA -1973-051
Eastern Passage

Attn: Ms. Carol Jo Sanner

Dear Colonel Gallagher:

The National Marine Fisheries Service (NMFS) reviewed the July 14, 2005, public notice of application for permit for the above referenced proposal by the Alaska Department of Transportation and Public Facilities (ADOT&PF) for work at the Wrangell airport. ADOT&PF proposes to place 1,621,000 cubic yards of fill in 66.93 acres of navigable and other waters of the U.S. and dredge 15,000 cubic yards of material from 0.31 acres of navigable waters of the U.S. to make improvements to Wrangell Airport. The project would expand the Runway Safety Area (RSA); relocate the seaplane pullout ramp; construct an aircraft turnaround; reduce airspace obstructions; and improve the runway, apron surfaces, and drainage. The purpose of the project is to improve airport safety and aircraft operations in accordance with Federal aviation Administration (FAA) acceptable standards.

NMFS provided scoping comments to ADOT&PF in a letter dated March, 18, 2005. NMFS participated in the April 18, 2005, multi-agency meeting in Wrangell and provided comments and mitigation ideas. NMFS submitted comments to ADOT&PF on the environmental assessment (EA) in a July 6, 2005 letter.

We offer the following comments specific to the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA), the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA).

Essential Fish Habitat

Section 305(b) of the MSFCMA (16 USC 1855 (b)) requires federal agencies to consult with NMFS when any activity proposed to be permitted, funded, or undertaken by a federal agency may have an adverse effect on designated Essential Fish Habitat (EFH).

Anadromous Fish

Two waterways within the airport property were identified in site investigations conducted by the U.S. Department of Agriculture and by Pentec Environmental. Both streams were found to contain rearing salmon. Significant anadromous fish streams in



the Wrangell area include the Stikine River, Crittenden Creek and Mill Creek/Virginia Lake. All five species of Pacific salmon (Chinook, coho, chum, sockeye and pink) use the nearshore waters along the airport property at some time of the year. Nearshore habitats are particularly important to juvenile salmon migrating from fresh water to salt water in the late spring and early summer.

Groundfish

The inshore area of the project location also provides important habitat for several marine species, including Pacific cod, Pacific Ocean perch, walleye pollock, dusky rockfish, shorttraker rockfish, yelloweye rockfish, rougheyeye rockfish, sablefish, arrowtooth flounder, Flathead sole, rex sole, skates, sculpins, and various forage fish. Marine species within the project area may be adversely affected by increased turbidity and underwater sound created during construction.

Minimization

Several of NMFS and other agencies recommendations have been incorporated into the project design which results in minimizing the impacts. These actions include using clean shot rock fill instead of wood waste, reducing the planned northwest expansion by 400 feet, reducing the marine footprint by placing Riprap on a 3:1 slope in the intertidal zone, and enhancing the rerouted stream for resident fish passage and habitat.

Proposed Compensatory Mitigation

NMFS supports the proposed compensatory mitigation projects and wishes to stay involved in further discussions involving these projects.

The MSFCMA requires NMFS to make conservation recommendations regarding any federal or state agency action that would adversely affect EFH. Accordingly, we offer the following EFH Conservation Recommendations:

1. The dollar value assigned to compensate for the loss of palustrine wetlands and estuarine, intertidal and subtidal habitats is low. ADOT& PF is proposing to contribute only \$15,500 for the 31 acres of palustrine wetlands (\$500 per acre) and approximately \$350,000 for the 35.83 acres of estuarine emergent, intertidal and subtidal habitats that will be filled. Values normally used by ADOT&PF in southeast Alaska are \$50,000 for highest value wetlands and waters, \$20,000 for ordinary shoreline and \$2,800 for low value wetlands. NMFS recommends that the dollar value placed on the palustrine wetlands and estuarine, intertidal and subtidal habitats be based on the actual costs for replacement. At a minimum the full amount of mitigation funds available for the project (\$500,000 according to a statement made by Tracy Moore) should be utilized.
2. We recommend that construction activities not be conducted during periods of peak use by juvenile salmonids and herring. No in-water work should be permitted from March 15 through June 15 to protect out migrating salmon and rearing salmonid smolts and to reduce the potential impact to schooling and spawning herring.

Upon receipt of these EFH Conservation Recommendations, the MSFCMA requires the Corps to respond to NMFS within 30 days informing us of the agency's decision regarding these recommendations.

Threatened and Endangered Species/Marine Mammals

The project is within the range of endangered humpback whales and threatened Steller sea lions, as well as harbor porpoises, harbor seals and killer whales, which are protected under the Marine Mammal Protection Act. This Act and the ESA prohibit the injury, harm or harassment of marine mammals.

Noise from in-water construction activities or from operational procedures can negatively impact marine mammals. NMFS has set MMPA Level A harassment at 180 dB (root-mean-squared) for cetaceans and 190 dB (rms) for pinnipeds for underwater levels. Noise produced above these levels may result in auditory injury to marine mammals. Precautions may need to be implemented to prevent injury, harm or harassment. NMFS recommends that in-water construction activities, be suspended when marine mammals are observed within 1,000 feet

If you have any questions regarding our comments and conservation recommendations for this project, please contact Cindy Hartmann (907-586-7585, cindy.hartmann@noaa.gov).

Sincerely,



Sue Salveson
Acting Administrator, Alaska Region

cc: Applicant, ADOT& PF, 6860 Glacier Highway, Juneau, AK 99801-7999
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