



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

February 10, 2006

Kristin K'eit
Department of the Interior
Bureau of Indian Affairs
P.O. Box 25520
Juneau, Alaska 99802-5520

Dear Ms. K'eit:

The National Marine Fisheries Service (NMFS) has reviewed the Cordova Oil Spill Response Facility Draft Environmental Impact Statement (DEIS). The DEIS evaluates a proposal by the Bureau of Indian Affairs (BIA) to develop a new oil spill response facility at Shepard Point near Cordova, Alaska. As proposed, the facility would consist of a dedicated deepwater port, additional staging and storage area, and an access road to the Cordova road system. NMFS offers the following comments and recommendations pursuant to the Fish and Wildlife Coordination Act, Magnuson-Stevens Fishery Conservation and Management Act, Marine Mammal Protection Act, and Endangered Species Act.

A comparison of project alternatives is presented in Table 2-6 of the DEIS. All the alternatives except the no action alternative (Alternative 1) meet the project purpose and need. The environmental impacts of Alternatives 2, 3, and 5 are similar and involve building a new oil spill response facility and deepwater port on the existing road system. Alternative 4, which is the preferred alternative, involves building a new oil spill response facility and deepwater port at Shepard Point and approximately 4.4 miles of new road.

Alternatives 2, 3, and 5 would involve dredging an estimated 155,000 cubic yards of material from 28 subtidal acres to provide a deep draft navigation channel. As presented in the DEIS, impacts from dredging in the Eastern Channel are expected to be minor (Table ES-1, p. ES-29). Less than 6.0 acres of intertidal areas would be filled for Alternatives 3 and 5. Alternative 2 would result in filling approximately 3.4 acres of eelgrass habitat. Alternative 4 would result in filling 18.7 to 28.2 acres of intertidal area, and approximately 7.1 to 8.9 of those acres include eelgrass. Thus, the impact to marine habitat and living marine resources would be greatest under Alternative 4.

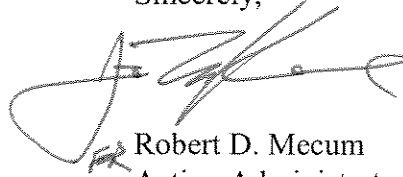
NMFS is concerned about the loss of eelgrass habitat under Alternatives 2 and 4. In particular, the large area of eelgrass habitat that would be lost under Alternative 4, and the resulting adverse effects to living marine resources, do not appear to be justified given the availability of other viable alternatives. According to the DEIS, Alternatives 2, 3, and 5 would meet the project purpose and need, are practicable, and would cost about half as much as BIA's preferred Alternative 4. NMFS was unable to find any explanation in the DEIS as to why the most expensive and environmentally damaging alternative is identified as the preferred alternative.



Based on the information in this DEIS NMFS considers Alternatives 2, 3, and 5 to be environmentally preferable to Alternative 4. We recommend that you select either Alternative 3 or 5 as the preferred alternative in the final EIS.

NMFS offers our assistance in developing further design details for the project to minimize impacts to living marine resources. Please contact Larry Peltz at (907) 271-1332 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Mecum", written over a horizontal line.

Robert D. Mecum
Acting Administrator, Alaska Region

cc: Steve Kokkinakis, NOAA
USFWS, ADNR/OHMP, EPA – Anchorage
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