



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

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

April 18, 2008

Mr. Stephen E. Gilbert  
Director, Program Management Office  
Alaska Communications System  
600 Telephone Avenue, MS8  
Anchorage, AK 99503

RE: Marine Communications Cable

Dear Mr. Gilbert:

The National Marine Fisheries Service (NMFS) has reviewed Alaska Communications System's (ACS) proposal to construct a marine communications cable originating in Florence, Oregon and terminating in Anchorage, Alaska. ACS plans to route the cable northward in deeper waters across the North Pacific and then into Cook Inlet. The cable is to be installed between June and September 2008.

Preliminary consultation between ACS and NMFS identified specific issues. These include avoidance of marine mammal critical habitats and Essential Fish Habitat (EFH), cable burial techniques, position data for any hard coral areas found during cable laying, and notification of the North Pacific Fishery Management Council (NPFMC).

ACS has determined that no adverse effects will occur to endangered or protected marine mammals due to the ship's low speed. NMFS agrees with this determination and believes that noise generated by the operations will also likely be low. Thus, no adverse effects on endangered or threatened marine mammals are anticipated. Be advised that any unintentional take of these species would violate federal law, and the operators should be advised to take reasonable actions (reduce operational noise levels, slow vessel speed, change course) if concentrations of marine mammals are observed in the immediate vicinity.

In addition to early coordination, ACS provided NMFS with subsequent more-detailed plans and routing information. This information assisted NMFS in our assessment. During review, NMFS noticed that a portion of the route approached several of the Alaska Seamount Habitat Protection Areas. ACS responded and supplied NMFS with smaller scale drawings that show the route avoiding these unique features. Lastly, ACS notified the NPFMC at its recent April meeting. The notice informed many commercial fishing interests of ACS's plan and route. NMFS commends ACS for this outreach effort.

ACS has demonstrated the project will not have any adverse effects to endangered and threatened species or EFH. ACS has also provided notice to the NPFMC and alleviated



concerns with cable routing. Therefore, NMFS agrees with ACS's determinations and has no objection to the proposed project.

If you have any questions regarding our comment, please contact Matthew Eagleton at (907) 271-6354 or [matthew.eagleton@noaa.gov](mailto:matthew.eagleton@noaa.gov) or Mandy Migura at (907) 271-1332 or [mandy.migura@noaa.gov](mailto:mandy.migura@noaa.gov).

Sincerely,



Robert D. Mecum  
Acting Administrator, Alaska Region

cc:

[steve.gerbert@acsalaska.com](mailto:steve.gerbert@acsalaska.com)  
[mary.gasperlin@acsalaska.com](mailto:mary.gasperlin@acsalaska.com)  
[marco.radonich@ch2m.com](mailto:marco.radonich@ch2m.com)  
[sgreenshields@nhti.usa.com](mailto:sgreenshields@nhti.usa.com)  
[thomas.atkinson@alaska.gov](mailto:thomas.atkinson@alaska.gov)  
[donald.perrin@alaska.gov](mailto:donald.perrin@alaska.gov)  
[bridgette.lohrman@noaa.gov](mailto:bridgette.lohrman@noaa.gov)  
[mandy.migura@noaa.gov](mailto:mandy.migura@noaa.gov)  
[matthew.eagleton@noaa.gov](mailto:matthew.eagleton@noaa.gov)