



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

April 26, 2008

Colonel Kevin J. Wilson
District Engineer
U.S. Army Corps of Engineers
P.O. Box 898
Anchorage, Alaska 99506-0898

Re: POA-2005-2000
Wrangell Narrows

Attn: Ms. Marcia Heer

Dear Colonel Wilson;

The National Marine Fisheries Service (NMFS) reviewed the April 3, 2008, public notice for the permit proposal by the Alaska Department of Transportation and Public Utilities (ADOT&PF). ADOT&PF proposed to discharge approximately 830,000 cubic yards of fill material into 79.4 acres of waters of the U.S. The project's purpose is to improve Petersburg airport safety by upgrading the Runway Safety Area to meet Federal Aviation Administration design standards and provide airport facilities that accommodate commercial and general aviation and medical evacuation services. The applicant is proposing to apply \$192,200 in compensatory mitigation funding towards the Falls Creek Fish Ladder Improvement Project. If any funds remain after construction of the fish ladder, they would be sent to the Wetlands Conservation Fund.

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act requires federal agencies to consult with NMFS on all actions that may adversely affect Essential Fish Habitat (EFH). NMFS is required to make conservation recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects.

NMFS provided comments to ADOT&PF at various stages of this project. A copy of our three most recent letters is enclosed for your reference. We have no additional EFH comments to make in regards to this public notice except to question the amount of money proposed for compensatory mitigation. Based on the correspondence NMFS has had with ADOT&PF it is our understanding that ADOT&PF will provide \$198,000 for compensatory mitigation for this project not \$192,200 as identified in the public notice. The \$198,000 amount is derived accordingly: \$45,500 for mitigation for 91 acres of wetlands; \$60,000 for mitigation for reduced flow to 1,200 linear feet of anadromous fish habitat (HS-5 downgradient); \$53,500 for 1,070 linear feet of anadromous fish habitat lost (HS-4, 6, 7; and MS-1 downgradient); and \$39,000 for 1,300 linear feet of resident fish habitat lost (HS-4, 6, 7; and MS-1 upgradient).

NMFS does not oppose this proposed work if at least \$198,000 is contributed for compensatory

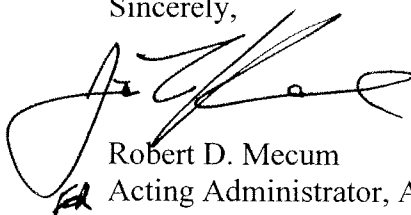


mitigation as ADOT&PF agreed to do. If funds remain upon completion of the repairs to Falls Creek Fish Ladder they should be designated for mitigation projects that would benefit marine or anadromous resources.

Under section 305(b)(4) of the Magnuson-Stevens Act, the Corps is required to respond to NMFS EFH recommendations in writing within 30 days. If the Corps will not make a decision within 30 days of receiving NMFS EFH Conservation Recommendations, the Corps should provide NMFS with a letter within 30 days to that effect, and indicate when a full response will be provided.

If you have any questions regarding our recommendations for this project, please contact Cindy Hartmann at 907-586-7585.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Mecum', with a large, stylized flourish extending to the left.

Robert D. Mecum
Acting Administrator, Alaska Region

cc: Jane Gendron, ADOT&PF, 6860 Glacier Highway, Juneau, AK 99811-2506
COE, Anchorage, Marcia Heer*
ADNR, Petersburg, Jim Cariello*
USFWS, Juneau, Richard Enriquez*
ADF&G, Juneau, Tom Schumacher*
NMFS, HCD, Juneau, Cindy Hartmann*
NMFS, AKR, Records
* electronic copy