



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

December 3, 2003

Van Sundberg
Environmental Coordinator
DOT&PF Southeast Region
6860 Glacier Highway
Juneau, AK 99801

RE: Juneau- Douglas Second Crossing EIS
Project Number 68540

Dear Mr. Sundberg:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced scoping letter and the materials provided at the November 4, 2003 agency scoping meeting. The proposed project would involve a second crossing of Gastineau Channel to connect mainland Juneau with North Douglas Island. The primary needs identified for the project are economic development and public safety. NMFS has been asked to serve as a cooperating agency for the preparation of this Environmental Impact Statement (EIS).

NMFS agrees to be a cooperating agency in the preparation of the EIS. We envision our role as follows:

- Providing information on essential fish habitat (EFH), marine mammal populations, and other living marine resources in the project area. This information will include identifying known sensitive areas, providing results of research conducted by NMFS in the project area, providing data on marine mammal populations and use of the project area, and identifying additional studies that are needed to adequately assess the impacts of the project on living marine resources.
- Reviewing drafts of EIS sections
- Attending appropriate meetings and providing input into the development of alternatives.

The enclosed document provides information on recommended additional research, known hot spots for fish and invertebrates within the project impact area, and additional references as requested by the Alaska Department of Transportation and Public Facilities (ADOT&PF). In addition, NMFS has the following general comments with respect to the proposed project:

Essential Fish Habitat

The EFH regulations require Federal agencies to evaluate the effects of proposed actions on



EFH and associated species of fish. This information is necessary for NMFS to fulfill its statutory responsibility to provide EFH Conservation Recommendations to minimize the adverse effects of the proposed action. A Federal agency must prepare an EFH assessment for any Federal action that may adversely affect EFH. The EFH regulations, 50 CFR 600.920 (e)(3), describe mandatory contents that must be provided in all EFH assessments. This information should be incorporated into the EIS.

Scope

The Juneau-Douglas Second Crossing EIS is being tied specifically to the development of Douglas Island as discussed in the West Douglas Conceptual Plan (Goldbelt, Inc. 1997) and, to a lesser extent, in the Comprehensive Plan of the City and Borough of Juneau (1995). These plans envision extensive development of West Douglas that would include residential, commercial and industrial activities. Because of the stated direct relationship between a second crossing of Gastineau Channel and the proposed development on Douglas Island that this crossing would facilitate, including an evaluation of the impacts of the proposed Douglas Island development within the scope of the Juneau-Douglas Second Crossing EIS is appropriate. Among the activities that should be evaluated are:

- Increased traffic on existing roads and/or effect of any proposed road expansion/development on natural resources
- Development in absence of extension of infrastructure (e.g. sewer, water) and the potential impact of infrastructure development
- Proposed port facilities, commercial zones and construction/development near shoreline and offshore

Study Area

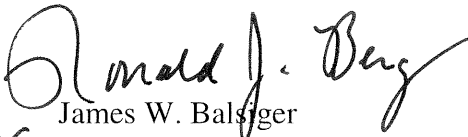

The study area should be expanded to include the west side of Douglas Island from Outer Point to Point Hilda including Hilda Creek and Bay. Fritz Cove and the marine areas adjacent to West Douglas Island have significant EFH (see enclosed list of "Known Hotspots for Fish/Invertebrates"). Fritz Cove is an important overwintering area for herring which are prey for a number of fish and marine mammal species. The north side of Douglas Island to Skull Island is an overwintering area for humpback whales. The west side of Douglas Island supports commercial and recreational fishing for several marine fish species as well as Dungeness and King crab. The EFH in Fritz Cove and the areas adjacent to West Douglas Island may be negatively impacted by proposed development that would be facilitated by the Second Crossing.

Cumulative Impacts

The Juneau-Douglas Second Crossing needs to be evaluated in the context of past, present and potential future impacts to the project area. At a minimum, these impacts should include: the proposed expansion of the Juneau Airport, the proposed Sunny Point Intersection improvements, and the proposed DOT Transportation Plan for southeast Alaska. All of these projects would involve construction and fill in intertidal wetlands with effects on anadromous streams and EFH in the vicinity of the proposed second crossing.

Linda Shaw is the point of contact for NMFS' involvement in this project. All requests for assistance and participation should be made through her. She can be reached by calling (907) 586-7510 or via email at linda.shaw@noaa.gov.

Sincerely,


For  James W. Balsiger
Administrator, Alaska Region

Enclosure

cc: K. Koski, ABL
K. Miller, HCD

Information Requested by ADOT&PF Juneau-Douglas Second Crossing EIS Scoping

Needed Research in Study Area

1. Determine location, characteristics and seasonal use of spawning habitats in Gastineau Channel and adjacent areas for important forage fish species, particularly capelin, sand lance, herring, and eulachon.
2. Determine location, characteristics and seasonal use of intertidal/subtidal rearing habitat for juvenile Dungeness crab and other crab species in Fritz Cove, Gastineau Channel and west side of Douglas Island.
3. Establish a baseline to characterize the seasonal range of tidal conditions as they relate to freshwater mixing and drainage patterns from the Mendenhall River and numerous streams draining into the area in Gastineau Channel and Mendenhall Wetlands. This baseline should include current speed and volume and salinity, flow direction, and sediment transport.
4. Model the effects of different crossing structures (e.g., floating bridges, bridges with piers, fill, tunnels, etc) on tidal currents, flow and sediment transport in relation to fish and wildlife habitat including emergent vegetated wetlands, mudflats, tidal sloughs, and substrate composition.
5. Determine the seasonal utilization of nearshore marine habitats on the west side of Douglas Island by marine and anadromous fish and marine mammals.
6. Estimate the impacts from the 2nd Crossing and the proposed development modules on the west side of Douglas Island on the commercial and recreational fisheries that occur there.
7. Determine/model the effects of a structure across Gastineau Channel on the migration of juvenile and adult salmon.
8. Establish a baseline of water quality characteristics for Gastineau Channel before, during and following completion of the project that includes natural and contaminant parameters .
10. Determine the marine/brackish shallow water fish and invertebrate fauna between Salmon Creek and Fritz Cove.
11. Determine spawning grounds, summer and winter adult distribution, and distribution of juvenile starry flounder from the Fritz Cove spawning stock.
12. Determine seasonal distribution and habitat requirements of pink shrimp (*Pandalus eous*) and sidestripe shrimp (*Pandalopsis dispar*) in Fritz Cove.

Known Hot Spots for Fish/Invertebrates

1. The mouth and intertidal area of all streams (about 20) and tidal sloughs encompassed by the Study Area and Mendenhall Wetlands provide rearing habitat and migratory habitat for anadromous and marine species of fish.
2. Fritz Cove is an important wintering area for herring and is used extensively throughout year by marine mammals and commercially important fish and shellfish species, particularly Dungeness, King, and Tanners crabs
3. Fritz Cove and the adjacent tideflats provide rearing and spawning areas for important flatfish.
4. The mouth of Fish Creek and Gastineau Channel support important recreational fisheries for trout and salmon that use these habitats as a migratory corridor.
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6. Gastineau Channel from about 9-mile Creek to the 1st navigational marker in Fritz Cove is used by capelin and sand lance for spawning.
7. The intertidal area at the end of the Mendenhall Peninsula near the mouth of the Mendenhall River is a highly productive area, as evidenced by high catches of marine and anadromous fish in NMFS EFH wetland surveys.
8. Picnic Cove near Outer Point is a prime recreational fishery location for King salmon as is Fritz Cove from the North Douglas boat launch to the entrance of Gastineau Channel.
9. The emergent vegetation in the wetlands is a major source of carbon and nutrients for the estuary and its organisms.
10. Wetlands within the Refuge provide secondary and tertiary treatment of regulated pollutants generated by sources such as municipal sewage treatment systems, Juneau International Airport, and non-point urban runoff. Control of such pollutants is critical to fish habitat quality and safe consumption of seafood from local sport and commercial fisheries.

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