



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

Tetra Tech RMC, Inc.
Attn: Bence Close
1900 South Sunset Street, Suite 1-F
Longmont, CO 80501

RE: Bald Ridge Aggregate Project DEA

Dear Mr. Close:

The National Marine Fisheries Service (NMFS) has reviewed the Draft Environmental Assessment (DEA) for the Bald Ridge Aggregate Project. The project site is located at Bald Ridge on the northeast side of Tamgas Harbor on Annette Island. The project consists of development of the Bald Ridge Quarry using open-pit mining techniques, processing facilities, loading and transportation facilities, and large stone processing. Under the preferred alternative, primary crushing of rock would occur at the south end of the quarry site and then be conveyed approximately 0.3 mile to a secondary crushing and processing facility adjacent to Tamgas Harbor between Asparagus Island and Yellow Point. A haul road would parallel the conveyor. A port facility would be developed next to the processing area and small aggregate would be conveyed onto barges.

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. For the purposes of this DEA, EFH includes all segments of streams where salmon reside during any period of the year as well as the marine waters and substrates of Tamgas Harbor. Tamgas Harbor provides habitat for a number of marine species including arrowtooth flounder, dusky rockfish, shortraker and rough-eye rockfish, skates, sculpins, and pollock.

Section 2.2.1 of the DEA indicates that the loading/conveyor system for transferring product from the processing facility to transport barges "would extend approximately 400 feet from the edge of the high water line out to where a barge could safely be moored.....This could be accomplished by either supporting the conveyor on structural supports or over a rock fill structure constructed with on-site materials. The former option would result in less modification to the harbor environment, whereas the latter option could more readily be used or amended as a docking facility for other purposes" The DEA also suggests that the haul road and port facility could be upgraded to stage and load large stone products onto barges. Which of these



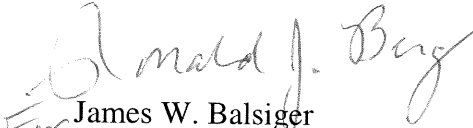
options was used to calculate the approximate acreage of disturbance from dock facilities in Table 2.2-2 is not clear. This should be clarified in the Final Environmental Assessment (FEA).

Section 4.2.6 discusses proposed mitigation for impacts to intertidal and subtidal areas. The DEA proposes restoration of degraded areas of intertidal and/or subtidal habitat on Annette Island at a 1:1 ratio. NMFS supports the use of restoration as a mitigation option, however, NMFS recommends that the ratio of wetland impact to restoration be a minimum of 1:2. The recommended ratio would prevent a net loss of wetland area and would help protect important intertidal habitat on Annette Island.

Finally, the DEA concludes that the proposed activities would impact, but would likely not adversely impact, EFH. NMFS concurs that the proposed best management practices will minimize adverse impacts to EFH. NMFS agrees with conclusion that the proposed activities will not adversely affect EFH.

Please contact Katharine Miller at (907) 586-7643 if you have any questions or for additional information related to this matter.

Sincerely,


For James W. Balsiger
Administrator, Alaska Region

cc: EPA Juneau, Chris Meade
USACOE, Colonel Griffith
ADEC, ADF&G, ADNR, USFWS, Juneau