



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

August 12, 2004

Mr. Guy McConnell
U.S. Army Corps of Engineers
Alaska District
EN-CW-ER
P.O. Box 898
Anchorage, Alaska 99506-0898

Re: Unalaska Small Boat Harbor
Draft Environmental Impact
Statement

Dear Mr. McConnell:

The National Marine Fisheries Service (NMFS) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed small boat harbor project located in Unalaska, Alaska. This DEIS is the accumulation of project reviews and meetings, which have specifically discussed potential impacts the project may have on living marine resources under NMFS jurisdiction.

General Comment

The project includes an alternative, referred to as Little South America South - Avoid Mussel Bed Alternative (LSA South) that directly addresses many of the resource concerns NMFS has raised during the design of the proposed project. LSA South incorporates measures to avoid the direct loss of marine habitat and minimizes the footprint of the project in marine waters. These measures include a construction timing window to avoid those times when sensitive fish life stages utilize or migrate through the project area, disposal areas for marine waste, fish cleaning stations, a blasting plan review requirement, and the development of a site specific oil spill response plan. Additional mitigation includes the creation of a 0.8-hectare intertidal habitat area, a 3-year monitoring effort, and the removal of two derelict barges at the head of Captains Bay.

Preferred Alternative Design Comment

The LSA South Alternative addresses specific issues of concern previously detailed by NMFS (NMFS Letter to COE-CW; October 4, 2001) and incorporates design changes, which avoid and minimize fill impacts from the offshore breakwater. The alignment of the breakwater avoids a large intertidal area, which has been documented to contain barnacles, shell hash, mussels, marine vegetation, and cobble. These habitat characteristics are known to be important for juvenile red king crab as settling substrate. Additionally, this alternative moves the breakwater offshore to allow construction of a nearshore breach at or just below the 0.0' MLLW contour. This breach will maintain the nearshore migratory corridor for marine fish and crab.



NMFS offers that this breach is adequate and will allow fish and crab to pass, except for a couple of hours a day for those 10 to 12 days of each month when the lower tide cycle is below 0.0' MLLW.

Essential Fish Habitat (EFH)

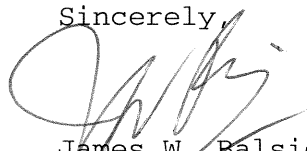
The DEIS concludes that there will be an effect on Essential Fish Habitat (EFH) for any of the design-build alternatives. Many of the mandatory components of an EFH Assessment [50 CFR 600.920 (e)(3); description of the action; effects analysis; action agency conclusions; mitigation] are contained in many sections in the document, however, it is difficult to specifically locate these components. Also, pertinent EFH species information is scattered in other sections of the DEIS, such as the red king crab and fish discussions in Sections 7.4.3 and 7.4.4, respectively.

NMFS recommends that the Final EIS clearly identify and reference where the mandatory components of the EFH Assessment are contained in the document. Reference should also be made to where EFH species are discussed in other sections of the document. Completion of these recommendations will facilitate EFH consultation and ensure provisions of the Magnuson-Stevens Act are satisfied.

Further, should the LSA South - Mussel Bed Avoidance Alternative be constructed and mitigated as proposed, NMFS preliminarily determines, from information in the DEIS, that adverse effects on EFH will likely not occur. Should the project change through your public environmental review process, NMFS may conclude differently.

NMFS remains willing to assist you with EFH and other living marine resource issues if needed. If you have any questions regarding our comments contact Matthew P. Eagleton in Anchorage at (907)271-6354.

Sincerely,



James W. Balsiger
Administrator, Alaska Region

cc: ADEC, ADFG, ADGC, USFWS, EPA - Anchorage