



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

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

December 22, 2005

Jane Gendron, Environmental Coordinator  
Alaska Department of Transportation and Public Facilities  
6860 Glacier Highway  
Juneau, Alaska 99801-7999

RE: Petersburg Airport Runway Safety  
Improvements Project Number 68207

Dear Ms. Gendron:

The National Marine Fisheries Service (NMFS) reviewed the Alaska Department of Transportation and Public Facilities (DOT&PF) November 23, 2005, request for scoping comments on the proposed improvements to the Runway Safety Area (RSA) at the Petersburg James A. Johnson Airport (PSG). We offer these scoping comments specific to the EFH provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA).

Proposed Work

DOT&PF in conjunction with the Federal Aviation Administration (FAA) intends to bring PSG into compliance with national aviation safety and design standards. The current RSA around Runway 4/22 at PSG does not meet FAA design standards in both width and length. The existing RSA is 200 feet (ft) wide and extends 200 ft beyond each runway threshold for a total length of 6,400 ft. FAA standards require 500 ft of width and a length of 1,000ft beyond each threshold, for a total required length of 8,000 ft.

The proposed action develops an additional 1,600 ft on the southwest end of Runway 4. The runway thresholds would be shifted 800 ft southwest, providing 1,000 ft of RSA at each runway end. The RSA would also be widened about the centerline for a total width of 500 ft. Shifting the runway would require navigational aids and airport electrical systems. The northeastern 8000 ft of the existing runway would be retained and the takeoff run available for Runway 4 would become 6,800 ft. An Environmental Assessment (EA) is being completed for the proposed project.

The condition of the culverts under the existing runway is being evaluated. These culverts may need to be rehabilitated. Specific plans on repair or replacement of individual culverts is currently not available. The existing culverts range from approximately 200 to 400 feet in length.

Environmental Background Information on Wetlands and Anadromous Fish

Information provided with the scoping request indicated the extent of wetlands and the presence of anadromous fish streams. PSG is located predominately on wetlands. With



the exception of those areas on which development has occurred, the entire property consists of emergent and scrub-shrub wetlands. Several streams flow south to north under the runway and into Wrangell Narrows. Two of these streams, 44-10010-2002 and 106-44-10010, are catalogued in the Alaska Department of Fish and Game's (ADF&G) *Atlas and Catalog of waters Important for Spawning, Rearing or Migration of Anadromous Fishes*. Both streams are catalogued for the presence of coho and pink salmon and Dolly Varden char. Adult anadromous fish access to stream habitat on the airport property is limited by chain link fencing. Access to stream habitat upstream of the runway is limited by culverts.

#### Essential Fish Habitat Consultation Process

The environmental analysis for the project must address the EFH requirements of the MSFCMA. Section 305 (b) of the MSFCMA requires Federal agencies to consult with NMFS on all actions that may adversely affect EFH. For such actions, a written EFH Assessment must contain:

1. A description of the proposed action.
2. An analysis of the potential adverse effects of the action on EFH and the managed species.
3. The Federal agency's conclusions regarding the effects of the action on EFH.
4. Proposed mitigation, if applicable.

If appropriate the assessment should also include:

- a) The results of an on-site inspection to evaluate the habitat and the site-specific effects of the project.
- b) The views of recognized experts on the habitat or species that may be affected.
- c) A review of pertinent literature and related information.
- d) An analysis of alternatives to the action, including alternatives that could avoid or minimize adverse effects on EFH.
- e) Other relevant information.

For information on federally managed species and EFH, NMFS directs you to the following web sites:

<http://www.fakr.noaa.gov/habitat/efh.htm> , <http://www.fakr.noaa.gov/maps/default.htm> ,  
and  
<http://www.fakr.noaa.gov/efh/download/efhshp.htm> .

#### Recommendations

NMFS offers the following Scoping comments and recommendations:

##### 1. Anadromous Fish Streams

A chain link fence around the perimeter of the airport blocks passage of adult anadromous fish to upstream habitats. Five streams that transect the runway are catalogued for anadromous fish and juvenile coho are present in the streams up to the runway (personal communication with Jim Cariello on December 20, 2005. Jim is a biologist with the Alaska Department of Natural Resources, Office of Habitat Management and Permitting.) According to Jim Cariello the gradient on these

streams is not over five percent and the stream habitat upstream of the runway would support anadromous fish if the existing culverts did not block juvenile passage. NMFS recommends that stream habitat surveys be conducted on the airport property sections of these streams both downstream and upstream of the runway in order to quantify the amount of fish habitat impacted by the proposed project. In addition, the EA should address providing passage for adult fish to upstream habitat that is currently blocked by the fence.

Widening the RSA will eliminate or negatively impact upstream and downstream habitat. Mitigation is appropriate to compensate for negatively impacted habitat. NMFS recommends that new culverts and rehabilitated culverts under the runway be designed to provide passage for juvenile and adult fish. If this can not be accomplished then compensatory mitigation should be considered for the habitat lost both upstream and downstream.

## 2. Wetlands Mitigation

The Clean Water Act 404 (B)(1) guidelines direct agencies first to avoid impacting wetlands, second to minimize any impacts to wetlands and last to compensate for unavoidable adverse impacts. The Wetland Delineation and Site Characterization (WDSC) for the PSG by Shannon and Wilson Inc., dated August 1, 1996, classifies the riparian wetlands surrounding the airport streams as high value wetlands (areas of special concern), and the remainder of the area as a mix of low to moderate value wetlands. These wetlands are not all low value wetlands as stated in the scoping letter. These wetlands provide functions such as groundwater recharge; water detention; sediment/toxicant retention; stream bank stabilization; nutrient removal and transport; detritus production; etc.

Compensatory mitigation for unavoidable wetland impacts is appropriate for this action and should be addressed in the assessment. In-lieu fees should be considered only after fully utilizing appropriate sequencing to avoid, minimize, and mitigate impacts. If fees are applied the value should be determined by utilizing: a systematic evaluation of the functions of impacted wetlands; the current fair market value of the wetlands being lost; or the real cost of replacing lost or reduced wetland functions.

We recommend that you coordinate mitigation plans with NMFS and other resource agencies. NMFS does not have specific recommendations for compensatory mitigation at this time, but we are willing to work with DOT&PF to identify potential projects.

## 3. Sediment Control/Timing Restrictions


Construction activities should not negatively impact rearing fish, eggs, and larva. The EA should clearly identify what precautions will be taken to avoid these impacts. Some methods worth consideration are utilizing construction timing windows, sediment control, water diversion, and fish barrier nets.

Additional Alternatives/Use of Engineered Material Arresting Systems (EMAS)

The information presented at the December 12<sup>th</sup> scoping meeting indicated that only two alternatives are being considered in the environmental analysis (EA), the proposed action and no action. NMFS recommends that additional alternatives be considered and analyzed in the EA. There should be an alternative that would minimize the amount of wetland fill required by utilizing EMAS. The feasibility and impact of utilizing EMAS is being evaluated at other airports in southeast Alaska including the Juneau International Airport. It is appropriate to consider and evaluate an EMAS alternative for the PSG airport as well.

NMFS may offer additional recommendations as more detailed project information becomes available. If you have any questions regarding our general comments and conservation recommendations for this project, please contact Cindy Hartmann at 907-586-7585.

Sincerely,



Robert D. Mecum  
Acting Administrator, Alaska Region

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