



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

June 23, 2006

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

Re: Nationwide Permit # 39
Pre-Construction Notification
Housepad fill, Wren Drive, Juneau

Attn: Mr. Randal P. Vigil

Dear Colonel Gallagher:

The National Marine Fisheries Service (NMFS) reviewed the June 6, 2006, Nationwide Permit (NWP) Pre-Construction Notification for housepad construction in category "A" wetlands located off of Wren Drive and the Back Loop Road in Juneau, Alaska. The applicant, Mr. Roger Lee, proposes to place approximately 800 cubic yards of fill material in .25 acres of wetlands to construct a 180 foot by 15 foot driveway and 40 foot by 60 foot housepad. The purpose of this wetland fill is to construct a single-family home.

We offer the following comments specific to the Fish and Wildlife Coordination Act to avoid, minimize, mitigate or otherwise offset adverse effects to important fish and wildlife habitat.

The site of the proposed fill is part of a large wetland complex, Montana Fen or ML1, described in the Juneau Wetlands – Functions and Values (Adamus 1987). This wetland is a large patterned fen and is rated high for the wetland functions of groundwater recharge, surface hydrologic control, sediment/toxicant retention, nutrient export, and riparian support, and the fen provides a high degree of regional ecological diversity, has a high ecological replacement cost, has high potential for recreational use, and supports downslope beneficiary sites. It is ranked as a Category A wetland in the Juneau wetland management plan and thus should receive the highest level of protection afforded under the Juneau Wetland Management Plan.

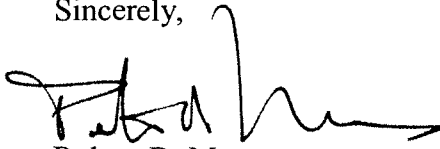
Given the non-water dependant use of the proposed wetland fill, the ecological importance of this wetland and the immediate connection to summer rearing habitat for anadromous Coho salmon NMFS recommends either modifying the proposed project as follows or reviewing the project under an individual permit.

1. The housepad size should be minimized to the smallest practicable footprint. The building pad should extend no further than 15 feet from the footprint of the house from any side. The housepad is planned to extend 15 feet from the front and back and 25 feet from the sides.
2. The applicant should allow the wetland plants that will be destroyed to be salvaged for use in the Nancy Street pond restoration site. NMFS can coordinate collection, storage and planting the wetland plants from the site of the proposed housepad.



If you have any questions regarding our comments and conservation recommendations for this project, please contact Susan Walker (907-586-7646, susan.walker@noaa.gov).

Sincerely,



Robert D. Mecum *for R/M*
Acting Administrator, Alaska Region

cc: Mr. Roger Lee, 8926 Trio Street, Juneau, AK 99801
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