



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

January 29, 2007

Mr. Marc Van Dongen
Port Director
Matanuska Susitna Borough
Palmer, Alaska 99645

Re: Knik Arm Ferry
POA-2006-1250

Dear Mr. Van Dongen:

Thank you for meeting with National Marine Fisheries Service (NMFS) staff recently regarding the Knik Arm ferry. We appreciate the additional information on alternative designs that was presented during our December 20, 2006 meeting, and the subsequent information provided by your consulting firm HDR, Alaska Inc. This information included a list of pros and cons on the alternative sites and drawings for the proposed commuter ferry system between Port MacKenzie and Anchorage.

During the December 20, 2006 meeting, several issues were discussed including (1) ferry construction and operation impacts to the depleted Cook Inlet belugas and other living marine resources; (2) physical obstruction, impeding beluga and their prey from using Ship Creek, an important feeding area for Cook Inlet belugas; (3) consideration of cumulative impacts to belugas and salmon, as related to this project and other planned development in upper Cook Inlet, and; (4) conflicting use plans for the Ship Creek estuary.

NMFS has previously provided comments and documentation on numerous occasions¹ that Knik Arm, including the Ship Creek estuary, provides habitat for migrating and/or rearing Chinook salmon, coho salmon, pink salmon, and chum salmon. Additionally, the project area for pile supported structures, as well as the ferry route, provides high value beluga habitat. Construction of a ferry landing that would obstruct the mouth of Ship Creek would be detrimental to proposed, current, and past efforts to restore and rehabilitate the Ship Creek estuary. Previous efforts have included the replacement of three failing culverts with a bridge at the mouth of Ship Creek, several streambank restoration efforts, and several angler access points. Currently, restoring fish passage above existing dams is being discussed. Future restoration efforts may include adopting one of the many "Concept Plans" that have been developed in the past to enhance the ecological function and promote the accessibility and attractiveness to the public for the Ship Creek waterfront and estuary.

Configurations for the ferry terminal at Ship Creek Point, including those that reduce the dock size across Ship Creek would, in addition to having varying degrees of impact on living marine

¹ April 30, 2003 response to review of the Federal Transit Authority's (FTA) June 2003 Environmental Assessment (EA), October 27, 2006 response to the Final Supplemental EA and EFH assessment prepared by FTA and the Matanuska-Susitna (Mat-Su) Borough, and November 9, 2006, response to the Corps of Engineer's Public Notice



resources, preclude the Municipality of Anchorage from use of the existing pad. Thus, this location is not consistent with their long term objectives to enhance the overall ecological function of Ship Creek, while increasing its recreational and commercial potential.

Also, we are aware that possible conflicts exist with North Star Terminal and Stevedore Company Inc., and the Alaska Railroad Corporation on the North Star site, but there may be options that could alleviate those conflicts. The Port of Anchorage has said that the proposed port expansion is needed for new customers. Perhaps opportunities exist to relocate the existing activities at the North Star Terminal to the Port of Anchorage. This would free up the North Star site for use by the ferry and perhaps cruise ships, and still be separate from industrial activities. Such a concept is intriguing and should be considered by the municipality. In addition, should the ferry become a major mode of transportation for the Mat-Su Prison employees, the security opportunities offered at the North Star site may be desirable.

Recommendations

In summary, a healthy, functioning Ship Creek estuary is vital for maintaining populations of salmon and marine mammals in upper Cook Inlet. Future Ship Creek estuary restoration efforts should direct industrial development to the north of Ship Creek (North Star alternative), allowing the area to the south to be restored for increased estuarine function benefiting fish, plants, birds, mammals and other organisms. Location of the ferry landing at Ship Creek Point, particularly with the dock extending across the entrance to Ship Creek, would greatly reduce restoration options. Therefore, NMFS continues to support locating the ferry at the North Star terminal site. In order to mitigate for construction impacts, as agreed to in our December 20, 2006 meeting, any alternative selected should have the following requirements:

- Conduct a noise study while driving the first pile at Ship Creek and Port Mackenzie to determine the affected radius surrounding pile driving activities. A safety zone will be established to ensure whales and pinnipeds are not exposed to sound levels above 160 db Sound Pressure Level. Mark the beluga safety zone with buoys or by use of a transit.
- Employ an independent paid marine mammal observer to be present at the construction site whenever in-water pile driving takes place.
- Stop pile driving if marine mammals are spotted within the safety radius, and do not resume construction until marine mammals are outside the area.
- Require the contractor to use a vibratory hammer to drive piles to refusal, then switch to an impact hammer to complete the pile driving.
- In-water pile driving will be less than 4 hours per day.
- Work with NMFS on an underwater noise reduction plan through the use of structural designs and /or operational procedures.

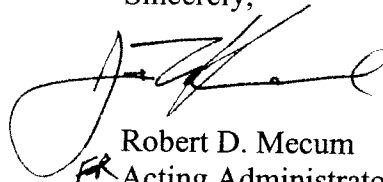
In addition, as in our November 9, 2006, response to the Corps of Engineers Public Notice we recommend the following conditions:

- Require an oil/water separator (or equivalent system) and/or vegetated swales to remove total suspended solids (TSS), oil, and grease from the ferry parking lot,

- ramp, associated buildings, and roads. The applicant should also implement a maintenance and monitoring plan for this system.
- o Conduct in-water and intertidal work at low tide to the extent possible. Conducting work at low tide will decrease the amount of sediment introduced to the water column.

We appreciate the opportunity to comment, and thank you for your patience in us getting back to you. Should you have additional questions on fish habitat, please contact Ms. Jeanne Hanson at 271-3029. Please contact Ms. Barbara Mahoney should you have additional questions on belugas or other marine mammals at 271-3448.

Sincerely,



Robert D. Mecum

Acting Administrator, Alaska Region

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