



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

October 15, 2007

Jane Gendron, Environmental Coordinator
Alaska Department of Transportation and Public Facilities
6860 Glacier Highway
P.O. Box 112506
Juneau, Alaska 99811-2506

RE: Petersburg Airport Runway Safety Area Draft
EFH Assessment
Project Number 68207

Dear Ms. Gendron:

The National Marine Fisheries Service (NMFS) reviewed the Alaska Department of Transportation and Public Facilities (ADOT&PF) Draft Essential Fish Habitat (EFH) Assessment on the proposed improvements to the Runway Safety Area (RSA) at the Petersburg James A. Johnson Airport. We offer these comments pursuant to the EFH provisions of the Magnuson-Stevens Fishery Conservation and Management Act.

Proposed Work

DOT&PF in conjunction with the Federal Aviation Administration (FAA) intends to upgrade the airport to meet FAA design standards for RSA length and width. The proposed action would expand the RSA dimensions to 8,000 feet by 500 feet from the existing 6,400 foot length and 200 foot width. This would be accomplished by shifting the runway west by 800 feet, extending the west end of the runway fill embankment 1,400 feet, and widening 300 feet about the runway centerline. Existing culverts would be replaced or abandoned. The existing culverts range from approximately 200 to 400 feet in length. Four new large diameter culverts will be installed at three tributaries of Hammer Slough (HS-4, HS-6, and HS-7) and one tributary of Mill Slough (MS-1). One new culvert would be added to drain across the expanded RSA at the west end of the project at a tributary of Mill Slough (MS-4). Other up gradient small drainages would be routed along the southern edge of the runway to connect to the new large diameter culverts or around the west end of the runway. The security fence would be relocated and extended to enclose the shifted and expanded RSA. Navigational aids and lighting would be relocated and or located to accommodate the shifted runway. The proposed action would require an estimated 830,000 cubic yards of fill material and generate approximately 370,000 cubic yards of waste consisting mostly of muskeg soil.



General Comments

As a stand alone document (not included in an Environmental Assessment (EA)) the EFH Assessment could be improved by adding some additional information, further clarifying information, or referencing where information can be found. The information provided could be improved in the following areas: distribution of anadromous fish both current and historical; acres and classification of wetlands impacted; anadromous fish habitat surveys; effects of increased or decreased stream flow on stream hydrology and stream habitat; proposed monitoring of fish habitat, stream channels, and fish populations; and mitigation.

The EFH Assessment is not fully responsive to NMFS scoping comments and comments made in project planning meetings. The document should include a discussion of ADOT&PF's decision not to provide fish rearing access through and above the culverts and to continue to block adult salmon access downstream of the airport fence. It should acknowledge permanent cumulative effects from limited upstream fish access (through and above the culverts and in HS-5) plus the potential effects to stream hydrology and stream habitat resulting from increased flow to drainage HS-4.

Specific Comments on Section II – Analysis of Effects to EFH

The first paragraph in this section includes what is reported in the Alaska Department of Fish and Game (ADF&G) *Anadromous Waters Catalogue and Atlas* (Atlas) but it does not include relatively recent site specific information provided the Alaska Department of Natural Resources (ADNR), Office of Habitat Management and Permitting. ADNR provided an aerial map of the airport area with the current anadromous fish habitat shown in blue and the estimated historic anadromous fish habitat above the runway displayed with a double red line (see December 28, 2005 memorandum from Jim Cariello to Jane Gendron). Drainages HS-5, HS-7 and MS-1 were not displayed as anadromous up to the runway in the Atlas, however the information ADNR provided showed the drainages as current anadromous fish habitat. This section should be updated accordingly. This section should also include a discussion of the historic anadromous fish habitat above the runway.

In our December 2005, scoping comments NMFS recommended that stream habitat surveys be conducted on the current and past anadromous fish drainages and disclosed in the analysis. NMFS recommended that new culverts and rehabilitated culverts under the runway be designed to provide passage for juvenile fish and if this could not be accomplished then compensatory mitigation should be considered for the habitat lost. If ADOT&PF has determined that fish access should not be restored, the EFH Assessment should explain the basis for that conclusion.

The EFH Assessment only included one sentence regarding wetland effects: "Long-term effects from the proposed project would be the loss of 86 acres of wetlands throughout the project area". Wetlands provide functions such as: groundwater recharge; water detention; sediment/toxicant retention; stream bank stabilization; nutrient removal and transport; detritus production; etc. At a minimum the type of and acres of wetlands impacted should be included or referenced in the analysis of effects.

The EFH Assessment should include an expanded discussion of the potential effects on stream hydrology and resulting effects to habitat. Specifically it should discuss how the increased flow from drainages HS-1, HS-2, HS-3 and HS-5 would impact stream hydrology, channel morphology, and fish rearing habitat in drainage HS-4. Is any monitoring, channel enhancement, or channel stabilization planned? What is the habitat value that could be created by the proposed drainage ditches at the RSA toe?

This section includes a table that summarizes the habitat lost by the proposed action. The amount of habitat that is displayed as lost in this table is a conservative estimate. It does not include cumulative effects and the 1200 feet of habitat lost in drainage HS-5 is displayed as reduced flow even though it is likely to be dewatered. This reach currently provides coho rearing habitat. It is the only area of coho rearing habitat that would be abandoned. The EFH Assessment should evaluate replacing the culvert for HS-5 rather than diverting the flow and dewatering 1200 feet of rearing habitat.

Specific Comments on Section III – Proposed Mitigation

The EFH Assessment should include a functional comparison of the wetlands and fish habitat affected by the proposed project and the benefits of the proposed mitigation. Without such a comparison it is difficult to assess whether the proposed mitigation is sufficient.

In discussions in February, 2007, NMFS supported off-site in-kind mitigation if on-site in-kind mitigation was not an option. This section should include a discussion of why on-site in kind mitigation was not proposed. Falls Creek fish ladder was originally constructed to improve fish passage over a partial barrier falls and was built and maintained by the ADF&G Fisheries Rehabilitation and Enhancement Division. NMFS supports repairing Falls Creek fish ladder. The EFH Assessment provided no information on how successful this enhancement project was or on how impaired the fish pass currently is. For example, how much did this ladder improve passage for anadromous fish and would the proposed repairs enable the fish ladder to pass enough fish to meet spawning escapement targets for the upstream habitat? If information on the enhancement success of the fish ladder is not available, then that should be stated. The USDA Forest Service has personnel in Petersburg with extensive fish pass expertise (Joe Teter, Civil Engineer, 772-5949; and John Pickens, Fishpass Engineer Technician, 772-5864) who may be available to assist with an assessment of functionality and/or provide expert advice on the proposed repairs.

Specific Comments on Section IV – Proposed Conservation Measures

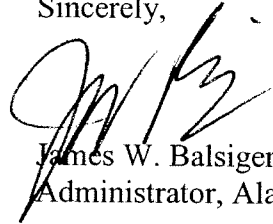
We have no specific comments for this section.

Specific Comments on Section V – Agency Determination

ADOT & PF's conclusions should acknowledge the cumulative effects to anadromous fish created by maintaining blockage to adult salmon within the project area and by not providing upstream rearing access past the culverts, and should include the permanent effects to wetlands. In addition, this section should summarize potential effects to stream hydrology and associated effects to stream habitat.

Thank you for the opportunity to provide comments. If you have any questions regarding our comments please contact Cindy Hartmann at 907-586-7585.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Balsiger', is written over the typed name.

James W. Balsiger
Administrator, Alaska Region

cc: ADNR, Petersburg, Jim Cariello
USFWS, Juneau, Richard Enriquez
EPA, Juneau, Chris Meade
ADF&G, Juneau, Tom Schumacher
ADOT&PF, Ben White and Jim Heumann
FAA, Patricia Sullivan
USKH, Linda Smith (lsmith@uskh.com)
USDA FS, Petersburg, Dick Aho