



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

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

December 7, 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  
Improvements, Draft EA  
Project Number 68207

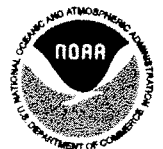
Dear Ms. Gendron:

The National Marine Fisheries Service (NMFS) reviewed the Alaska Department of Transportation and Public Facilities (ADOT&PF) Draft Environmental Assessment (EA) and the Essential Fish Habitat (EFH) Assessment contained in the EA for the Petersburg Airport Runway Safety Area Improvements, Project No. 68207. We offer these comments pursuant to the EFH provisions of the Magnuson-Stevens Fishery Conservation and Management Act.

ADOT&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.

Comments on the EFH Assessment

NMFS appreciates ADOT&PF's November 30, 2007, letter with your detailed response to our October 15, 2007, comment letter on the draft EFH Assessment. Will information in your response letter that is not in the draft EFH Assessment or EA be included in the final document (for example the first paragraph of your response number 3)? The EFH Assessment in the Draft EA could be improved by including or referencing the cumulative impacts from fish habitat loss in the project area, not just the proposed action specific impacts. For example, paragraph six on page 4 of 6 states: "Long-term effects from the proposed project would be the loss of 91 acres of wetlands throughout the project area." Cumulative effects also include the habitat loss and reduced flow identified in the table on page 4 of 6 and the continued restriction of anadromous access to 13,000 linear feet of anadromous fish habitat above the runway (as described in section 4.5.1 and in Appendix H). The EFH Assessment would also be improved by summarizing or referencing the hydrology discussion in Sections 4.5.1 and 4.12.



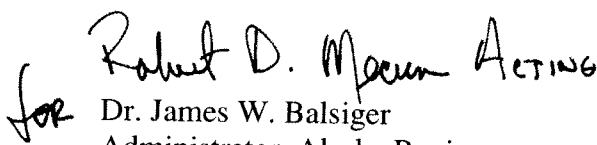
Comments on the Draft EA

Section 4.14 includes a discussion of the repair needs of the Falls Creek fish ladder and the estimated cost of repairs but no information on the history and success of the fish ladder project. Falls Creek fish ladder was originally constructed to improve fish passage over a partial barrier falls. Is there any information available on how successful this enhancement project was (i.e. how much did it increase escapement) or on how impaired the fish pass currently is (i.e. how much is escapement decreased)? The EA 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. The EA should clearly explain how the mitigation value was determined, including addressing the value concerns raised by Corps of Engineers in their scoping letter (see Appendix F).

The *Fish, Wildlife and Plants* section on page 27 states: "To mitigate for the 2,370 linear feet of fish habitat impacted by the proposed project \$92,500 will be allocated to fund proposed Falls Creek fish ladder repairs." Is the 2,370 linear feet the 1,300 feet of upgradient resident fish habitat and the 1,070 feet of downgradient EFH (from Table 5 on page 15)? If yes, why is the reduced flow habitat not included? Page 4 of your November 30, 2007, letter to NMFS states: "Filling EFH and reducing flow to EFH are considered equivalent impacts." Also how did you derive the \$92,500 amount? The bottom of page 27 states: "Compensatory mitigation for wetland impacts under the Proposed Action will be \$45,500 (\$500/acre)." What is your rationale for this value?

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,

  
for Robert D. Macoun Acting  
Dr. 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](mailto:lsmith@uskh.com))  
ADCOM, Joe Donohue  
COE, Victor O. Ross

Cindy Hartmann  
December 6, 2007

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