



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

July 5, 2007

Michael F. Gearheard, Director
Office of Water and Watersheds
US. Environmental Protection Agency
Region 10
1200 Sixth Avenue, OWW-130,
Seattle, WA 98101

RE: Request to participate as a Cooperating
Agency on the Red Dog Mine Extension

Dear Mr. Gearheard:

This letter is in response to your letter dated June 21, 2007, inviting the National Marine Fisheries Service (NMFS), to be a cooperating agency with the Environmental Protection Agency (EPA) on the Environmental Impact Statement (EIS) for the Aqqaluk Extension Project of the Red Dog Mine. The Aqqaluk extension project will require modification EPA's National Pollutant Discharge Elimination System (NPDES) permit to include discharges associated with the Aqqaluk project. The EPA has determined that this is a major federal action requiring the preparation of an EIS.

Teck Cominco Alaska Incorporated (TCAK) currently operates the Red Dog Mine which is located in northwestern Alaska, approximately 80 miles north of Kotzebue and 46 miles inland from the coast of the Chukchi Sea. The Red Dog Mine includes an open pit lead/zinc mine, flotation mill for processing the mined ore, waste rock disposal areas, a tailings impoundment, and personnel support facilities. TCAK estimates that the current Red Dog mine pit will be mined out between 2010 and 2012. The proposed Aqqaluk project would extend the life of the Red Dog Mine until approximately 2031. The Aqqaluk Project includes a new open pit lead/zinc mine located adjacent (northeast) of the current Red Dog Mine pit. The existing Red Dog Mine facilities and transportation route would be used for the Aqqaluk project.

NMFS has reviewed the Environmental Information Document (EID) supplied by the EPA on the proposed project. NMFS offers the following information under the Endangered Species Act (ESA), and the Essential Fish Habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).

Threatened and Endangered Species

Section 7(a)(2) of the ESA directs federal interagency cooperation "to insure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of any endangered species or threatened species" or result in the destruction or adverse modification of critical habitat. NMFS is responsible for the administration of the ESA as it applies to listed cetaceans, pinnipeds and Pacific salmon in Alaska.



EPA has not identified any endangered species under NMFS jurisdiction in the EID. In addition, the information provided in the EID indicates that the activity to be authorized by the modification of the NPDES permit would occur inland. Due to the inland location of the project, threatened and endangered species under our jurisdiction will not occur in the vicinity of the project site, and critical habitat for those listed species would not be affected. Additional information regarding the ESA is available on our website at <http://www.fakr.noaa.gov/protectedresources/default.htm>.

Essential Fish Habitat

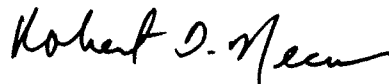
Under Section 305(b)(2) of the Magnuson-Stevens Act, federal agencies are required to consult with the Secretary of Commerce on any action that may adversely affect EFH. EFH has been designated for anadromous salmon and certain life stages of marine fish under NMFS' jurisdiction. The trigger for EFH consultation is a federal action agency's determination that an action or proposed action, funded, authorized or undertaken by that agency *may adversely affect EFH*. The information in the EID indicates that the proposed project would not adversely affect EFH. Additional information regarding EFH is available on our website at www.fakr.noaa.gov/habitat/efh.

Summary

Based on the information provided in the EID, NMFS does not anticipate any additional impacts to our resources as a result of the Aqqaq Extension Project. Therefore, we decline the opportunity to be a cooperating agency on the project. However, we note that the information in the EID was supplied by the applicant and that EPA as the federal action agency is responsible in making effect determinations. Should EPA determine that there would be adverse impacts to living marine resources, NMFS will review and comment on the EIS and consult with EPA, if appropriate.

Thank you for the opportunity to comment. If you have any questions regarding our comments please contact Jeanne Hanson at (907) 271-3029, or at jeanne.hanson@noaa.gov.

Sincerely,



Robert D. Mecum,
Acting Administrator, Alaska Region

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