



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

August 23, 2004

Kris Benson
Project Environmental Coordinator
Alaska Department of Transportation and Public Facilities
6860 Glacier Highway
Juneau, Alaska 99801-7999

RE: Revisions to Scoping Document for Sunny
Point Intersection Improvement Project
Project No. 71431; Federal Project No. STP
093-2(31)

Dear Ms. Benson:

The National Marine Fisheries Service (NMFS) has reviewed the Department of Transportation and Public Facilities (DOT) updated scoping request for the Sunny Point Intersection Improvement Project. We previously provided scoping comments on the initial scoping documents and offer the following comments on the revision specific to the Essential Fish Habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA).

The revisions include more accurate estimates of the amount of wetlands that would be impacted and project revisions that would reduce the extent of expected wetland impacts. These revisions include revising the side slope configuration between on/off ramps and Egan Drive traffic lanes from 1:1 to 1.5:1 and combining these slope surfaces with retaining walls, revising portions of the base slope protection on the south side of Egan Drive from riprap to retaining walls, changing the slope of base riprap protection on the north side of Egan Drive from a 2:1 slope to a 5:1 slope, revising the median width of Egan Drive from a tapered 3' to 30' wide configuration to a continuous 30' width, revising the horizontal and vertical geometry of the Egan Drive off and on ramps, and relocating the Sunny Drive underpass 100' westward.

These proposed actions would extend the existing Switzer Creek culverts by 68', extend the East Creek replacement culvert by 107', extend the West Creek replacement culvert by 36', and realign and replace three existing culverts on an unnamed creek to the west of the project with an enlarged culvert system 310' in length.

These proposed project changes would result in a wetland fill footprint of 4.6 acres. An area of potential wetland restoration is identified at the east end of Sunny Drive totaling 0.66 acres.



NMFS recognizes the need for safety improvements at the Sunny Point intersection and appreciates ADOT's efforts to plan this project to minimize the effects on important wetlands and stream habitat in the project area. NMFS previously noted that this alternative, Alternative 4 - Diamond with K-Mart Link and Sunny Point Underpass, would maximize the use of existing uplands or filled areas and minimize fill of wetlands.

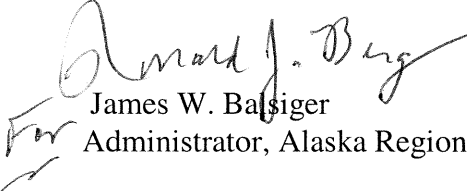
The MSFCMA EFH regulations require Federal agencies to prepare an EFH assessment for any action that may adversely affect EFH. This information is necessary for NMFS to fulfill its statutory responsibility to provide EFH Conservation Recommendations to minimize the adverse effects of the proposed action. The EFH regulations, 50 CFR 600.920 (e)(3), describe mandatory contents that must be provided in all EFH assessments.

Upon review of the completed EFH assessment, NMFS will provide conservation recommendations to the Federal Highway Administration (FHWA) through the DOT to avoid or reduce adverse effects to EFH and species for which EFH has been designated. Upon receipt of NMFS' EFH Conservation Recommendations, the MSFCMA requires the FHWA to respond within 30 days informing us of the agency's decision regarding the recommendations.

The EFH Assessment should discuss impacts to EFH for the following species that are likely to be affected by the proposed project: migrating and/or rearing coho salmon, pink salmon, and chum salmon; yellowfin sole; starry flounder; butter sole; English sole; sand sole; and walleye pollock. These are the species for which EFH has been designated that would most likely utilize the estuarine area and anadromous streams of the project site. EFH is also present for the following species: sculpins and forage species including Pacific herring, sand lance, and eulachon. The EFH Assessment should also discuss mitigation actions that avoid, minimize or compensate for the loss of 4.6 acres of intertidal estuarine wetlands and impacts to East, West and Switzer Creeks.

If you have any questions regarding our comments and information requests for this project, please contact Sue Walker (586-7646, susan.walker@noaa.gov).

Sincerely,


James W. Balsiger
For Administrator, Alaska Region