



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

July 6, 2005

Van Sundberg, Environmental Coordinator
Alaska Department of Transportation and Public Facilities
6860 Glacier Highway
Juneau, Alaska 99801-7999

RE: Wrangell Airport Runway Overlay/RSA
and Seaplane Pullout Replacement
State Project 68167, Environmental Assessment

Dear Mr. Sundberg:

The National Marine Fisheries Service (NMFS) reviewed the Alaska Department of Transportation and Public Facilities (DOT&PF) June 16, 2005, request for review and comment on the draft Environmental Assessment (EA) on the Wrangell Airport Project.

Project Background/Proposed Work

DOT&PF in conjunction with the Federal Aviation Administration (FAA), intends to construct improvements to resolve safety and operational deficiencies at Wrangell Airport. The proposed work would include expansion of the runway safety area (RSA), relocation and reconstruction of the seaplane pullout ramp, construction of an aircraft turnaround, and installation of new signing and nav aids for the airport. Improvements would be made to the runway surface, apron surface, and airfield drainage systems. Airway obstruction hazards would be partially mitigated. The proposed action extends one end of the RSA by 800 feet (Runway 28/RW 28) and the other end by 400 feet (RW 10). This would not meet the FAA criterion for a full standard RSA for planes landing in both directions, however the runway would provide a standard RSA for all landings from the RW 10 end, which comprise 90 percent of the landings. Measures to minimize environmental impacts have been incorporated into the proposed action.

NMFS General Comments

In a March 18, 2005, letter NMFS provided scoping comments specific to the essential fish habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act, the Marine Mammal Protection Act, and the Endangered Species Act. NMFS also attended the April 28, 2005, agency meeting and site visit in Wrangell and provided comments during the meeting. Pages 5-50 and 5-51 in the draft EA address NMFS scoping comments. NMFS is satisfied with ADOT&PF's response to our concerns and offers no further EFH Conservation Recommendations nor further marine mammal or endangered species recommendations. NMFS supports ADOT&PF's modified proposed action including reducing the RSA by 400 feet, using clean rock fill instead of wood waste and reducing the marine footprint by placing Riprap on a 3:1 slope in the intertidal zone.



T & E Species and Marine Mammals

The second paragraph in section 4.11.3 on page 4-27 of the EA states “NMFS concluded the project was unlikely to have adverse effects on Steller sea lions if construction activities stop when sea lions approach within 1,000 feet.” NMFS March 18, 2005, letter states:

“Noise from in-water construction activities or from operational procedures can negatively impact marine mammals. NMFS has set MMPA Level A harassment at 180 dB (root-mean-squared) for cetaceans and 190 dB (rms) for pinnipeds for underwater levels. Noise produced above these levels may result in auditory injury to marine mammals. Noise impacts to marine mammals from construction operations should be analyzed in the assessment. Precautions may need to be implemented to prevent injury, harm or harassment. NMFS recommends that in-water construction activities, such as dredging, be suspended when marine mammals are observed within 1,000 feet.”

The summary of NMFS conclusion in the Threatened and Endangered Species Section on page 4-37 appears to be taken out of context and should include the humpback whale as well as the Steller sea lion. The conclusion stated in this section was not stated in NMFS April 18th letter. If this conclusion was reached in a discussion between NMFS with ADOT&PF staff subsequent to our April letter then that should be cited. It would be helpful if readers were also directed to section 4.20.3, Environmental Commitments page 4-48 and Section 5.2.3 Agency Coordination – 2005 Scoping Update page 5-51. Both of these sections state ADOT&PF’s commitment to cease in-water work if marine mammals are observed within 1000 feet. In addition, section 5.2.3 contains your response to NMFS request for analysis of noise impacts.

Proposed Compensatory Mitigation

NMFS supports the proposed compensatory mitigation projects and wishes to stay involved in further discussions involving these projects. However, NMFS questions the dollar value placed on the palustrine wetlands and estuarine, intertidal and subtidal habitats. The values placed on these habitats are not as high as on other projects in Southeast Alaska and are therefore not consistent with other projects such as Gravina Access and Ketchikan RSA. Values normally used by ADOT&PF are \$50,000 for highest value wetlands and waters, \$20,000 for ordinary shoreline and \$2,200 for lower value wetlands. ADOT&PF is proposing to contribute only \$15,500 for the 31 acres of palustrine wetlands (\$500 per acre instead of \$2,200) and approximately \$350,000 for the 35.83 acres of estuarine emergent, intertidal and subtidal habitats that will be filled. At a minimum the full amount of mitigation funds available for the project (\$500,000 according to a statement made by Tracy Moore) should be utilized.

Wetland Acres

There are some inconsistencies in the acres of wetlands in different sections of the EA. Section 4.12 Wetlands on page 4-39 discusses impacts on 46.2 acres of jurisdictional wetlands, which includes 31 acres of palustrine muskeg and 15.12 acres of estuarine emergent sedge. If 46.2 is the correct acreage then the acres of palustrine muskeg is 31.08 not 31 acres. The value for palustrine wetlands would need to be changed in Section 4.20.2 on page 4-47.

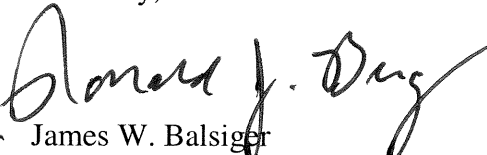
Section 4.12 describes 3.97 acres of subtidal area and the EFH assessment in Appendix E

on page 4 describes 3.98 acres of subtidal habitat. This small inconsistency should be corrected in the final document and compensatory mitigation values based on accurate values.

Conclusion

NMFS is pleased with the minimization and mitigation actions that are incorporated into the proposed action as well as the opportunity for involvement. NMFS recommends some edits to sections 4.11.3, 4.12, 4.20.2, and Appendix E. If you have any questions regarding our comments please contact Cindy Hartmann at 907-586-7585.

Sincerely,


James W. Balsiger
Administrator, Alaska Region

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