



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

April 18, 2008

Colonel Kevin J. Wilson
District Engineer
U.S. Army Corps of Engineers
P.O. Box 6898
Anchorage, Alaska 99506-0898

Re: POA-2008-127
Gulf of Alaska Inside Passage

Attn: Chiska Derr

Dear Colonel Wilson:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced application from GCI Communications to construct a 743.78 mile long submerged fiber optic telecommunications cable within the Inside Passage of Southeast Alaska. The submerged cable would extend between the communities of Ketchikan, Wrangell, Petersburg, Juneau, Hawk Inlet, Angoon, and Sitka and would be installed by a 115-meter cable laying ship with 6-meter support vessels transferring the cable to land. The cable will traverse Mitkof Island via ground and cross Schultze Cove Isthmus due to dangerous marine conditions through Sergius Narrows. At each land/water interface (except Shultze Cove Isthmus) the cable will be buried in conduit between Mean Lower Low Water and Mean High Water and proceed to a vault placed 5 to 20 feet above the high tide line depending on topography. A 2 x 3-foot trench will be excavated by a rubber tired or tracked vehicle to bury the cable. Excavated material will be placed beside the trench and backfilled the same day. No additional fill material will be used during the project. The purpose of the project is to better serve Alaskan communities by providing higher security and bandwidth capability through fiber optic telecommunication technology.

The General Permit Agency Coordination request indicated that 1,648 linear feet of excavation would occur resulting in 0.227 acres of impacted intertidal habitat. An amended application submitted on February 21, 2008, shows an accumulated total of approximately 3,485 linear feet of projected excavation up to the high tide line that would result in approximately 0.48 acres of dredged or fill material placed in intertidal waters.

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act requires federal agencies to consult with NMFS on all actions that may adversely affect Essential Fish Habitat (EFH). NMFS is required to make EFH Conservation Recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects. The Alaska Department of Fish and Game's Anadromous Waters Catalog identifies numerous anadromous fish streams in the vicinity of project. These streams support runs of coho, chum, pink, and sockeye salmon, as well as Dolly Varden, cutthroat, and steelhead trout. Juvenile salmon use



nearshore habitat during spring and early summer for feeding and predator avoidance prior to migration out to sea.

In accordance with Section 305(b)(4)(A) of the Magnuson-Stevens Act, NMFS makes the following EFH Conservation Recommendations:

1. Intertidal cable excavations to the vault structures should be adjusted to avoid disturbance to eelgrass beds if present.
2. Coordination with area biologists from the Alaska Department of Fish and Game should be incorporated into the permit specifications to ensure minimal impact to out-migrating juvenile salmon in nearshore waters. Consultation should also involve coordinating timing windows of commercial fisheries to avoid conflict in marine waters with the cable laying vessel.

Under section 305(b)(4)(B) of the Magnuson-Stevens Act the Corps is required to respond to NMFS EFH Conservation Recommendations in writing within 30 days. If the Corps will not make a decision within 30 days the Corps should provide NMFS with a letter within 30 days to that effect and indicate when a full response will be provided.

Additionally, we recommend that you require the applicant to provide coordinates of the cable route location to the National Ocean Service Nautical Charting Division for inclusion onto nautical charts to help commercial fishing vessels identify and avoid accidental contact with the submerged cable (<http://nauticalcharts.noaa.gov/nsd/reps.htm>).

NMFS is also responsible for administering the Endangered Species Act (ESA) and Marine Mammal Protection Act (MMPA), which prohibit the injury, harm, or harassment of marine mammals. A link to a list of Endangered and Threatened Species found in Alaskan waters (<http://alaskafisheries.noaa.gov/protectedresources/esaakspecies.pdf>) and a link to Species of Concern (<http://www.nmfs.noaa.gov/pr/species/mammals/pinnipeds>) are provided for guidance on marine mammals that may be encountered during the project. A charted Steller sea lion haulout at Sunset Island (57° 30.0 N; 133° 35.0 W) in Stephens Passage is located near where the cable will be submerged. To ensure minimal interference with marine mammals that are known to exist in the project waters a link is provided for guidance when these animals are encountered <http://www.fakr.noaa.gov/protectedresources/mmv/guide.htm>.

If you have any questions regarding our recommendations for this project, please contact Tim Wilkins at (907) 586-7643 or timothy.wilkins@noaa.gov.

Sincerely,



Robert D. Mecum
Acting Administrator, Alaska Region

cc: Applicant
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Optics Cable POA-2008-127 tgw.doc
File Code: 1503-16(a) Inside Passage – GCI Communications submerged fiber optic cable

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