



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

July 19, 2004

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

RE: Juneau-Auke Bay Fast Ferry Support Facility
Project No. 67763/SHAK-9500(103)

Dear Ms. Erickson:

The National Marine Fisheries Service (NMFS) has reviewed the Essential Fish Habitat (EFH) Assessment to construct a support facility for the Alaska Marine Highway System (AMHS) fast ferry vessel at the Auke Bay Ferry terminal. The project requires filling approximately 0.9 acre of uplands and nearshore tidelands for a new building, vehicle access, and employee parking. Storm water runoff would drain from the site through buried pipes and oil-water separators or a vegetated swale on the Glacier Highway side of the property.

The project would eliminate 0.69 acre of nearshore and intertidal habitat in Auke Bay that has been designed as EFH. The EFH Assessment identifies the following species that may be adversely impacted by this project: migrating and/or rearing Chinook salmon, coho salmon, pink salmon, sockeye salmon, chum salmon, yellowfin sole, starry flounder, butter sole, English sole, sand sole, and walleye pollock. EFH is also present for the following species: sculpins, Pacific cod, and forage species including Pacific herring.

The April 8, 2004 scoping document indicates that the project is not expected to appreciably add to cumulative impacts of development in Auke Bay due to its location, small footprint, and the moderate resource value of the habitat that would be impacted. While the proposed project is relatively small, a significant portion of the existing development and impact in this portion of Auke Bay is a result of fill for Alaska Department of Transportation and Public Facilities (ADOT&PF) facilities. The proposed project site is the last remaining unfilled area along a stretch of shoreline that has been substantially altered by armoring for the Glacier Highway, fill for the existing AMHS ferry terminal facility and parking, fill for private commercial vessel operation, and fill for the Glacier Seafoods Facility. The fact that the proposed project site has only moderate resource value is a direct result of the cumulative impacts of the numerous projects in this area. We suggest that a more realistic evaluation of the cumulative impacts in this project area be completed.



NMFS is also concerned that among the facilities being proposed is a sewage disposal facility that would utilize an onsite drainfield constructed within the limits of the new fill. Auke Nu Cove currently receives sewage effluent from the waste treatment facilities of the existing AMHS Ferry Terminal, the Auke Nu Condominiums, and possibly from private residences on either side of the cove. In addition, new effluent will be introduced into the cove by the Glacier Seafoods facility. To our knowledge, the total amount and location of sewage effluent entering Auke Nu Cove and its effect on marine water quality and algal blooms have not been documented. This information is essential to determining the potential impact of new sewage facilities on EFH.

ADOT&PF has determined that the project may adversely affect EFH and has proposed the following conservation measures:

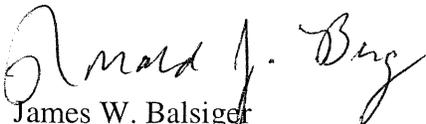
1. Fill would be placed at low tides to reduce the amount of sediment introduced into the marine environment
2. Fill material would be composed of rock fill and riprap free from fines and suspendable material to the extent practicable, and free from contamination by petroleum products or toxic substances.
3. No in-water work would occur between March 15 and June 15 to limit impacts to herring and juvenile salmon
4. Oil-water separators would be monitored and maintained during construction and operation of the facility

NMFS concurs with the determination of potential impact to EFH and with the proposed conservation recommendations. In addition, we offer the following additional EFH Conservation Recommendations:

1. ADOT&PF should develop more thorough analysis of the cumulative impact of shoreline development in the vicinity of the proposed project. This analysis should evaluate any potential habitat losses resulting from shoreline fill and armoring, including direct habitat loss from facility construction and operation, and indirect losses as a result of changes in local ecological processes, such as circulation patterns.
2. ADOT&PF should conduct more thorough analysis of the amount and location of sewage effluent entering Auke Nu Cove, including the additional effluent levels anticipated from this project, and the effect on marine water quality and algal blooms.

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

Sincerely,


For  James W. Balsiger
Administrator, Alaska Region

Cc: ADF&G, Janet Schempf
ADNR OHMP, Moira Engle
M. Erickson
USFWS, Richard Enriquez